

Contract No.: 100-98-0009  
MPR Reference No.: 8550-912

**MATHEMATICA**  
Policy Research, Inc.

**The Evaluation of the  
Tribal Welfare-to-Work  
Grants Program:  
Initial Implementation  
Findings**

*November 2001*

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## ACKNOWLEDGMENTS

We gratefully acknowledge the time, effort, and advice pertaining to this report provided by: the U.S. Department of Labor's (DOL) Division of Indian and Native American Programs (DINAP); the U.S. Department of Health and Human Services (DHHS) Administration for Children and Families (ACF), Division of Tribal Services (DTS); and the National Congress of American Indians (NCAI).

In addition, the advice and review of the Tribal Workgroup (TWG) proved to be invaluable. We appreciate the time and effort of the TWG members: Harold Bahe (Navajo Nation), Dr. Eddie Brown (Buder Center for American Indian Studies), Mr. Leo Cummings (Three Affiliated Tribes), Norm DeWeaver (Indian and Native American Employment and Training Coalition), Dr. David Gipp (United Tribes Technical College), Ms. Virginia Hill, (Torres Martinez Desert Cahuilla Tribe), Rebecca Ondelacy (Zuni Pueblo NEW), Erline Paul (Penobscot Nation), Lorenda Sanchez (California Indian Manpower Consortium, Inc.), and Bobbie Whitefeather (Chairman, Red Lake Band of Chippewa Indian Nation).

Finally, we wish to thank the Welfare-to-Work (WtW) grantees who participated in the study: the California Indian Manpower Consortium, Inc. (CIMC), the Eastern Band of Cherokee Indians, the Kickapoo Tribe in Kansas, the Klamath Tribes, the Navajo Nation, the Nez Perce Tribe, the Red Lake Band of Chippewa Indians, the Tanana Chiefs Conference, Inc. (TCC), the Three Affiliated Tribes, and the White Earth Reservation Tribal Council. These WtW grantees face many challenges, have unmet needs, and have limited resources. Nevertheless, they have freely given time and assistance to the study, with the goal of improving their own efforts and those of all tribes and Native Villages to help Indian people achieve self-sufficiency and end dependence on welfare. Without their cooperation and support, this report would not have been possible.

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## EXECUTIVE SUMMARY

The Welfare-to-Work (WtW) grants program supplements other program resources that American Indian tribes and Alaska Native villages can draw on to address the employment needs of their members. One percent of the overall \$3 billion that Congress appropriated for the WtW grants program in the Balanced Budget Act (BBA) of 1997 was set aside for a tribal WtW program. Thus, a total of \$30 million was awarded to tribal grantees in fiscal years (FY) 1998 and 1999. These resources, along with funds from the Temporary Assistance for Needy Families (TANF), Native Employment Works (NEW), and other programs, are available to tribes to help the most disadvantaged welfare recipients make the transition from welfare to work.

Congress also mandated an evaluation of the tribal WtW program. The evaluation is being conducted, under contract to the U.S. Department of Health and Human Services (DHHS), by Mathematica Policy Research, Inc. and its two subcontractors, the Urban Institute and Support Services International, Inc. This report, based on site visits to a diverse sample of 10 tribal WtW grantees in fall 1999 and spring 2000, describes how the tribal WtW program has been implemented in Indian country, problems encountered, and promising approaches developed.<sup>1</sup> The report takes a broad view of tribal program implementation, describing the policy context for WtW, the special circumstances of tribes, the program framework for WtW implementation, the nature of the program services, and, finally, lessons learned for the future.

### POLICY CONTEXT

Over the past 20 years, the federal government has increasingly supported tribal self-governance and self-determination. Indian tribes and tribal consortia have been explicitly included in federal welfare reform initiatives such as TANF, the Child Care Development Fund, WtW, and NEW. Congress and federal agencies administering these programs have supported Indian self-determination and tribal consultation in formulating legislative provisions and in developing policies and regulations. Legislation and regulations permit tribes to operate programs and, in recognition of their special circumstances, allow some degree of flexibility in program operation.

Special provisions of the tribal TANF, WtW, and other employment and training programs affect implementation of tribal WtW programs. Such provisions relate to:

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<sup>1</sup>The study site grantees are the California Indian Manpower Consortium, the Eastern Band of Cherokee (North Carolina), the Kickapoo Tribe (Kansas), the Klamath Tribes (Oregon), the Navajo Nation (Arizona, New Mexico, Utah), the Nez Perce Tribe (Idaho), the Red Lake Band of Chippewa (Minnesota), the Tanana Chiefs Conference (Alaska), Three Affiliated Tribes (North Dakota), and the White Earth Reservation Tribal Council (Minnesota).

- ***Operation of TANF Programs.*** Tribes can choose to provide TANF services themselves or to obtain services from the state(s) or another tribe.
- ***Allocation and Use of Funds.*** Tribal WtW grantees are allowed to spend up to 20 percent of their grant funds on administrative costs (instead of being held to the 15 percent limit that applies to nontribal WtW grantees).
- ***TANF Time Limits.*** State and tribal TANF programs are required to disregard from the 60-month limit on TANF benefits any month during which an adult lives in Indian country where at least 50 percent of the adults are not employed.
- ***Services and Service Population.*** Tribal WtW, TANF, and NEW programs have flexibility in defining the program service area, service population, and work activities, and the supportive services to be provided.
- ***Use of Employment and Training Funds.*** The Indian Employment, Training and Related Services Demonstration Act of 1992 (Public Law 102-477) allows tribes to combine the formula funds they receive for a variety of employment, training, education, and related services from federal agencies, including the Department of Labor (DOL), DHHS, Department of Education, and Bureau of Indian Affairs (BIA).

## **SOCIOECONOMIC CIRCUMSTANCES OF TRIBES**

The challenge of ending welfare is nowhere more daunting in the United States 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 American Indians and Alaska Natives and reflect unique historical and cultural factors. As compared to 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 absence or underdevelopment in Indian country of the 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 capital.

Despite obstacles, innovative development efforts have produced sorely needed tribal revenue, most notably from gaming and related tourism. These initiatives have improved economic prospects and created jobs on some reservations. Nevertheless, the current pace of job creation, compared to the number of jobs needed, suggests that, for

years to come, a lack of jobs will prevent many TANF recipients and others from securing unsubsidized employment.

## WTW PROGRAM FRAMEWORK AND IMPLEMENTATION

At the time of the study site visits, all of the tribal WtW programs were fully operational, but in general, the WtW programs represented a modest complement to other existing programs. Three specific findings illustrate this overall point:

- ***The WtW grants are small compared to the TANF program and to the number of unemployed tribal members.*** In FY 1999, tribal WtW grants ranged from under \$10,000 to over \$2.5 million. The amounts of the grants for the 10 grantees participating in this study ranged from \$41,000 (Kickapoo Tribe) to over \$2.5 million (Navajo Nation). Grantees proposed to serve as few as six participants (Kickapoo Tribe) and as many as 425 (California Indian Manpower Consortium).
- ***Tribal WtW funds in the 10 sites are used to enhance and expand existing employment-related programs.*** For small tribes, such as Kickapoo, Nez Perce, and Klamath, WtW funding was sufficient to pay the wages of one staff member or a portion of the wages of several. None of the grantees operated its WtW program independently of other employment and training programs.
- ***Recruitment was a challenge.*** As was true with for nontribal grantees, most of the tribal grantees in the study experienced some difficulty in identifying and recruiting eligible individuals, or in getting people to enroll and stay involved in program services.

## PROGRAM SERVICES

Tribal WtW grantees offer many of the same services as nontribal grantees. All of the grantees in the study provide some preemployment job readiness preparation—usually workshops or individualized counseling—to help participants overcome self-doubts about working and address other serious barriers to employment. The tribal grantees commonly make available, either directly or through referral, a variety of supportive services: transportation assistance, child care, substance abuse treatment/counseling, uniforms or other clothing, work tools and equipment, and help in securing a driver's license and other forms of identification.

In several respects, however, tribal grantees work differently from nontribal grantees:

- ***Tribal grantees must develop agreements with state agencies to promote referral from TANF offices.*** Typically, a memorandum of understanding is developed between the tribal WtW program and local TANF agency. In some cases, agreements with multiple counties (and even with multiple states) are needed.



- ***Difficulties identifying TANF recipients who are tribal members can complicate WtW recruitment.*** While states and counties may record the race/ethnicity of TANF recipients, they seldom record the particular tribe to which American Indian participants belong. As a result, they may not know whether they are suitable for referral to particular tribal WtW programs.
- ***Despite the work-first philosophy and other WtW guidelines, some tribal grantees emphasize preemployment education and training, as well as supported-work opportunities.*** Tribal TANF recipients often lack basic and job-specific skills, and thus have limited prospects for immediate job placement. In light of the limited job openings on or near most reservations, and the multiple employment barriers confronting many tribal TANF recipients, some programs have implemented a longer-term approach that focuses on preparing for better-paying jobs with career development potential.

## **LESSONS LEARNED AND USEFUL STRATEGIES FOR THE FUTURE**

The experiences of the 10 tribal grantees included in this study highlight the challenges commonly faced in Indian country and suggest the following lessons.

### **Improving Coordination with Other Programs, Especially TANF, Is Critical to Successful Program Implementation**

WtW funding is small and time-limited in relation to the size and need of the target population. Well-established linkages with other programs and agencies—especially TANF—are critical for recruitment, for referral of WtW participants to needed services, and for addressing longer-term education and employment needs.

### **States Can Be an Important Source of Support and Technical Assistance**

By devolving responsibility for TANF to states, the federal government has changed the relationship between tribes and states. No longer can tribes look solely to the federal government for guidance concerning welfare rules and benefits for tribal members. Moreover, tribes must now negotiate with states for the data they need to plan and administer their own TANF programs.

Cooperation on welfare reform may represent one of the best examples of tribal-state collaboration and serve as a model for cooperation in other areas. For example, state governments have worked with tribes in the study sites to plan for and carry out the transfer of the TANF program from the state to the tribe or tribal consortium. The states provided training and technical assistance to tribal staff and shared their approaches to TANF data collection, management, and reporting. Most of the states examined in this study have provided the tribal TANF programs with some or all of the matching funds the states would be required to provide in a state-run program.

## **Cooperation with States Can Strengthen Child Support Enforcement and Fatherhood Initiatives**

PRWORA and other welfare reform legislation promote child support and responsible fatherhood, but progress on these fronts has been slow at most of the study sites. However, some WtW programs have made strong efforts to find and serve noncustodial parents by coordinating with state child support enforcement programs. For example, one tribe has negotiated agreements with state agencies under which it locates noncustodial parents, obtains default and other judgments, and collects support in ways that are in keeping with decisions of tribal courts. The state provides funding and technical support and helps the tribe recover support from noncustodial parents living away from the reservation.

## **Forming a Consortium or Establishing a 477 Program Can Help Tribes Implement Welfare Reform and WtW Programs**

Small tribes face unique challenges in implementing welfare reform that can be mitigated if they form a consortium to provide employment, training, and other programs. A consortium enables small tribes to share program staff and operating costs. Tribes may also want to consider establishing a 477 program, which can in some ways make it easier for them to merge funding from WtW, NEW, and other sources for employment and training activities.

## **In Indian Country, It May Be Necessary to Supplement “Work First” with Education, Training, and Supported Work**

The work first approach that is the hallmark of most state TANF and WtW programs assumes that, with the right incentives and supports, and limited job-readiness or skills preparation, most TANF recipients will find work. Such an approach may be impractical on Indian reservations, where prospects for finding work are often poor and there is little new job creation. Tribal programs would do well to consider how they can supplement work first approaches with other program services to upgrade basic skills, provide educational credentials, and offer subsidized work opportunities.

## **WtW Programs Can Help Expand Child Care Availability, but There Are Obstacles**

Several WtW grantees included in this study have trained TANF recipients to become licensed child care providers. However, one obstacle, especially for home-based care, is that a child care trainee’s housing might be substandard and require extensive, time-consuming, and expensive renovations to comply with federal, state, or tribal standards. In addition, a home-based child care provider might not be able to generate enough income to achieve long-term self-sufficiency.

## **WtW Programs Can Help Expand Successful Approaches to the Transportation Problem in Indian Country**

Several WtW grantees in this study addressed the transportation problems tribal WtW participants face. For example, grantees developed van service to shuttle workers from home to work, leased or otherwise provided refurbished automobiles to people successfully placed in jobs, and reimbursed participants for travel costs.

## **WtW Programs Can Help Support the Economic Development Efforts of Tribes**

To support economic development efforts, tribal WtW administrators and staff can carefully document the available pool of TANF/WtW participants, their existing skill levels, and how such individuals' skills could be upgraded to meet new employers' needs. Such documentation of available labor, and having a plan for upgrading skills, could help bring new employers to the reservation or nearby towns.

# I

## INTRODUCTION

American Indian tribes use a number of programs, including the Temporary Assistance for Needy Families (TANF) program and the Native Employment Works (NEW) program, to place members in jobs and to improve their economic well-being.<sup>1</sup> The Welfare-to-Work (WtW) grants program offers tribes additional resources to supplement those of TANF, NEW, and other programs by targeting the most disadvantaged welfare recipients and helping those with significant barriers to employment make the transition from welfare to work. This report, based on site visits to a diverse sample of 10 tribal WtW grantees, describes how the tribal WtW program has been implemented in Indian country, the problems encountered, and the promising approaches developed.<sup>2</sup> The report has a broad focus, which includes a description of the special circumstances of tribes and the effects of welfare reform in Indian country.

The evaluation of the tribal WtW program is mandated by the Balanced Budget Act (BBA) of 1997 and is being conducted under contract from the U.S. Department of Health and Human Services (DHHS) by Mathematica Policy Research, Inc. and its two subcontractors, the Urban Institute and Support Services International, Inc. Because of the special circumstances in Indian country, the findings pertaining to the tribal WtW program are presented separately in this report. Findings from the national WtW evaluation are reported elsewhere.<sup>3</sup>

### A. PURPOSE OF THE STUDY

The tribal evaluation assesses the implementation and operation of tribal WtW grantees' programs and how they are evolving in a diverse set of sites. The evaluation also assesses how social, cultural, economic, programmatic, and other factors unique to Indian country and to each site affect this evolution. The study describes the implementation of the WtW program in the broader context of welfare reform and the special circumstances of tribes. The goal of the study is to provide information to Congress, tribes, federal agencies, states, and others concerning four issues:

1. How the special circumstances of tribes affect their WtW programs in particular and welfare reform in general (Chapter II)

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<sup>1</sup>In this report, "Indian tribe" refers to any federally recognized Indian tribe, rancheria, pueblo, or Alaska Native village.

<sup>2</sup>"Indian country" refers to American Indian reservations, Alaska Native villages and adjacent counties, and the states of Alaska and Oklahoma.

<sup>3</sup>See, for example, Nightingale (2001) and Perez-Johnson et al. (2000).

2. The framework for implementation of tribal grantees' WtW programs (Chapter III)
3. How tribes are using WtW funding, the types of services provided, and the attributes of the clients served (Chapter IV)
4. Promising approaches developed by tribes and tribal consortia in implementing WtW and other programs associated with welfare reform, as well as lessons learned and policy implications of grantees' experiences (Chapter V)

This report presents the initial findings of the tribal WtW evaluation based on the first round of site visits to 10 tribal WtW grantees conducted in fall 1999 and spring 2000. It supplements a report, prepared for and submitted to all the federally recognized tribes in November 2000, on the initial lessons based on the experience of tribal WtW grantees (Hillabrant and Rhoades 2000). Both reports are based on the first round of site visits. The earlier report was prepared for tribal leaders and managers. The present report was prepared for people interested in welfare reform in Indian country, including members of Congress, federal, state, and tribal policymakers, and program administrators.

## **B. POLICY CONTEXT**

Indian tribes and consortia of tribes have been explicitly included in federal welfare reform initiatives such as TANF, Child Care Development Fund (CCDF), WtW, and NEW. Both Congress and federal agencies administering these programs have supported Indian self-determination and tribal consultation in formulating the legislation and in developing policies and regulations. The legislation and regulations permit tribes to operate the programs and allow some flexibility for the special circumstances and interests of each tribe.

The WtW grants program is a \$3 billion program established by Congress as part of the BBA. Its purpose is to provide additional resources to supplement the welfare reform funds included in the TANF block grant, which was authorized under the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996. Congress intended that these additional funds would support programs, especially in high-poverty communities, that help the least employable, most disadvantaged welfare recipients make the transition from welfare to work and that help noncustodial parents increase their earnings and support their children.

The BBA permits Indian tribes and tribal consortia to participate in the WtW grants program.<sup>4</sup> One percent (more than \$30 million) of the \$3 billion was set aside for the tribal WtW program; \$15 million was awarded to tribal grantees in fiscal year (FY) 1998

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<sup>4</sup>Not every federally recognized tribe was eligible for a WtW grant. Only those tribes that operated a TANF or NEW program, or that met the "substantial services" criterion, were eligible. Substantial services is defined as having operated an employment program that served a minimum of 50 public assistance recipients over the last two program or fiscal years, or where 20 percent of the people served had received public assistance during the most recent program or fiscal year.

and a similar amount in FY 1999 (Table I.1 presents the key components of the tribal WtW program). While the WtW grants represent a distinct funding stream, most tribal grantees use the funds, combined with funding from other programs (e.g., NEW, TANF, Job Training Partnership Act [JTPA], Workforce Development Act [WIA]), to enhance services provided by existing employment programs. As discussed in Chapter III, under the authorization of the Public Law (PL) 102-477 program, some tribes have reprogrammed WtW and other funds into a unified “477 Program” that addresses particular circumstances and goals set by the tribe.

PRWORA authorizes tribes or tribal consortia to operate a TANF program and allows them flexibility in the specification of the service area and population and operation of the program. In fall 2000, the Office of Child Support Enforcement in the Administration of Children and Families (ACF), DHHS, issued interim regulations (45CFR Part 302) that permit tribes to enter into cooperative agreements with state agencies to assist in administering the State Child Support Enforcement (CSE) plan.

Primary federal responsibility for tribal programs related to welfare reform is spread across units of two departments—Health and Human Services and Labor (DOL). Within DHHS, ACF administers tribal TANF and NEW programs (through the Office of Community Services/Division of Tribal Services), the Administration on Children, Youth, and Families administers tribal CCDF (through the Child Care Bureau), and the Office of Child Support Enforcement administers CSE. Tribal WtW programs are administered by the Division of Indian and Native American Programs (DINAP) in DOL. Both DHHS and DOL have consulted with tribes in developing and modifying regulations for tribes operating TANF, NEW, CSE, and WtW programs.

In Indian country, as in all communities throughout the United States, the overall goal of welfare reform is to help people dependent on welfare to become gainfully employed and financially independent. The TANF program, in conjunction with other federal and state programs such as food stamps, Medicaid, Medicare, and the Children’s Health Insurance Program (CHIP), provides income support while helping participants secure unsubsidized employment. The WtW program was designed to help the most disadvantaged and least employable TANF recipients move from welfare to work. The NEW program, authorized by PRWORA, replaced the tribal Job Opportunities and Basic Skills Program (JOBS) and provides a variety of work-related activities (e.g., education and training, work readiness, employment activities, supportive and job retention services) to tribal members. NEW grantees may also provide labor/job market assessments, job creation, and economic development activities designed to lead to job creation. Only those tribes and Alaska Native villages that operated a tribal JOBS program in FY 1995 are eligible for NEW grants.

TABLE I.1

## KEY TRIBAL WTW PROVISIONS

Provision	Original Program	Amended Program
Authorization	The Indian and Native American (INA) WtW Program is authorized by Title V, section 5001(c) of the Balanced Budget Act of 1997 (PL 105-33), which amended title IV-A of the Social Security Act by adding section 412(a)(3) [42 U.S.C. 612(a)(3)].	Title VII of HR 3424, the Departments of Labor, Health and Human Services, and Related Agencies Appropriations Act of 2000.
Effective Date	8/5/1997	11/29/1999
Grantee Eligibility	Three categories of federally recognized Indian tribes, consortia of such tribes, or Alaska Native regional nonprofit corporations are eligible to receive INA WtW funds—those that (1) operate a tribal TANF program, (2) operate a NEW program, or (3) operate an employment program funded through other sources under which substantial services are provided to recipients of assistance under a program funded under Part A of title IV of the Social Security Act.	No change
Funding Formula	Two funding formulas used: (1) for TANF and NEW tribes, based on welfare caseload data (AFDC/TANF data); and (2) for the “substantial services” tribes, based on FY 1990 Census data. Each eligible tribe received a formula allocation that represents its share of the national total.	No change
Eligibility for Hard-to-Employ Long-Term Welfare Recipients (70% Category)	No less than 70 percent of the WtW grant funds must be expended to serve clients who meet 2 conditions: 1. Received assistance for at least 30 months AND 2. Meets 2 of 3 characteristics: <ul style="list-style-type: none"> <li>• Lacks HS diploma or GED AND has low math or reading skills</li> <li>• Has poor work history</li> <li>• Requires substance abuse treatment for employment</li> </ul>	Received TANF assistance for at least 30 months, OR is within 12 months of becoming ineligible for TANF due to time limits
Eligibility for Recipients with Characteristics of Long-Term Dependency (30% Category)	Up to 30% of the WtW grant funds may be expended to serve clients, including noncustodial parents, who are school dropouts, experience teenage pregnancy, or have a poor work history.	Up to 30% of the WtW grant funds may be expended to serve clients who fall in at least 1 of 3 categories: <ol style="list-style-type: none"> <li>1. Youth who have “aged out” of foster care</li> <li>2. Custodial parents with incomes below the poverty level</li> <li>3. TANF recipients who face barriers to self-sufficiency under criteria established by the local workforce investment board</li> </ol>

TABLE I.1 (continued)

Provision	Original Program	Amended Program
Eligibility for Noncustodial Parents	<p>Eligible under both the hardest to serve (70%) and long-term welfare dependency (30%) categories</p> <p>Under hardest to serve category (70%), must meet 2 of 3 characteristics:</p> <ol style="list-style-type: none"> <li>1. Lacks HS diploma or GED AND has low math or reading skills</li> <li>2. Has poor work history</li> <li>3. Requires substance abuse treatment for employment</li> </ol>	<p>Noncustodial parents eligible only under the 70% category if they meet each of 3 conditions:</p> <ol style="list-style-type: none"> <li>1. Are unemployed, underemployed, or have difficulty in making child support payments AND</li> <li>2. Their minor children (1) are eligible for TANF or receive TANF benefits; (2) received TANF benefits in the preceding year; or (3) are eligible to receive benefits from Food Stamp, Supplemental Security Income, Medicaid, or Children’s Health Insurance Programs; AND</li> <li>3. Enter into a personal responsibility contract under which they commit to establish paternity, pay child support, and participate in services to increase their employment and earnings, and to support their children.</li> </ol>
Personal Responsibility Contracts for Noncustodial Parents	Not required	Required (see above)
Integration with Workforce Investment Act	A state’s WtW plan is a supplement to its TANF plan.	Addition to the 30% eligibility category: TANF recipients who face barriers to self-sufficiency under criteria established by Workforce Investment Board (WIB)
Allowable Activities	<ol style="list-style-type: none"> <li>1. The conduct and administration of community service or work experience programs</li> <li>2. Job creation through public or private sector employment wage subsidies</li> <li>3. On-the-job training</li> <li>4. Contracts with public or private providers of readiness, placement, and postemployment services</li> <li>5. Job vouchers for placement, readiness, and postemployment services; and</li> <li>6. Job retention or support services if such services are not otherwise available</li> </ol> <p>Stand-alone training is not an allowable activity.</p>	Preemployment vocational education and job training for up to 6 months is added as allowable activity.
Other	None	Any participant enrolled in a tribal WtW program prior to the 1999 Amendments will remain eligible despite changes in eligibility.
Grantee Reporting Requirements	Using forms developed by DOL, grantees are required to submit cumulative quarterly and annual reports covering program activity and financial expenditures.	Minor change in reporting forms



TABLE I.1 (continued)

Provision	Original Program	Amended Program
Inclusion in PL 102-477 Program	All grants awarded under the INA WtW program are formula-funded; any INA WtW grant funds awarded to a tribe can therefore be included in a consolidated plan authorized by PL 102-477. For those tribes already participating in the 477 demonstration, application for an INA WtW grant will take the form of a "477 plan" modification submitted to the lead agency responsible for the 477 program.	No change

## C. STUDY METHODS AND SITES

The study focuses on a small but diverse set of tribal WtW grantees. Ten grantees were selected from the 92 tribal grantees that were awarded WtW grants by DOL in FY 1999 with the aim of ensuring variation in five attributes (see Table I.2):

1. Region of the country defined as East (east of the Mississippi River), Southwest (Arizona, New Mexico, Oklahoma, Texas, Utah), Plains (Kansas, Montana, Minnesota, North Dakota, South Dakota, Wyoming), Pacific (California, Idaho, Nevada, Oregon, Washington), and Alaska
2. Size of the TANF population defined, for the purposes of this study, as large (more than 1,000), medium (between 100 and 999), and small (fewer than 100)
3. Whether the tribal grantee operates a PL 102-477 program
4. Whether the tribal grantee operates its own TANF program
5. Whether the grantee is an individual tribe or a tribal consortium

TABLE I.2  
DIVERSITY OF STUDY SAMPLE ON KEY ATTRIBUTES

Grantee	State(s)	Region	Size of TANF Population	102-477 Program	Tribal TANF	Consortium
1. California Indian Manpower Consortium, Inc. (CIMC)	CA	Pacific	Medium	No	No	Yes
2. Eastern Band of Cherokee (EBCI)	NC	East	Medium	No	No	No
3. Kickapoo Tribe of Kansas	KS	Plains	Small	No	No	No
4. The Klamath Tribes	OR	Pacific	Small	No	Yes	No
5. Navajo Nation	AZ, NM, UT	Southwest	Large	No	Yes	No
6. Nez Perce Tribe	ID	Pacific	Medium	Yes	Yes	No
7. Red Lake Band of Chippewa Indians	MN	Plains	Medium	No	No	No
8. Tanana Chiefs Conference, Inc. (TCC)	AK	AK	Large	No	Yes	Yes
9. Three Affiliated Tribes (TAT)	ND	Plains	Medium	Yes	No	No
10. White Earth Reservation Tribal Council	MN	Plains	Medium	Yes	No	No

## 1. Study Sites

Appendix A presents a profile of each of the 10 WtW grantees in the study. These profiles describe the economic context in which the grantee WtW program operates, as well as the program's structure, model, and services provided.

Grantees were selected to ensure diversity in the five attributes discussed, but they were also chosen based on the comprehensive plans and innovative approaches described in the WtW grant proposals. When more than one grantee met the five diversity criteria, the one with the most comprehensive or innovative proposal was selected to participate in the study. Two alternates were selected for each of the 10 grantees selected, in case some of the grantees might be unable to participate in the study. Despite the diversity of the WtW grantees in the study sample, they were not selected at random, and no attempt is made in this report to generalize the study findings to other tribal WtW grantees, tribes, or tribal consortia.

The grantees in the study were diverse in other attributes as well (see Table I.3). While there are inconsistencies between the data reported in published sources and the data provided at site visits, Table I.3 does give a sense of the variation across tribes and of the relative nature of differences among the grantees. For example, the size of the Tanana Chiefs Conference enrolled member population is less than five percent of the Navajo Nation; roughly similar to that of Red Lake, the Cherokee, and Three Affiliated

TABLE I.3

### OTHER ATTRIBUTES OF STUDY SAMPLE

Grantee	Land Area (Square Miles)	Population		Labor Force <sup>a</sup>
		Enrolled Members	Residents	
California Indian Manpower Consortium, Inc. (CIMC)	NA	NA	34,000	23,384
Eastern Band of Cherokee (EBCI)	56,688	10,000	6,311	2,366
Kickapoo Tribe of Kansas	4,879	326	478	350
The Klamath Tribes	372	3,248	3,748	735
Navajo Nation	16,224,896	234,786	234,786	41,451
Nez Perce Tribe	750,000	3,300	16,159	743
Red Lake Band of Chippewa Indians	837,736	9,264	7,974	871
Tanana Chiefs Conference, Inc. (TCC)	138,240	11,086	6,191	142
Three Affiliated Tribes (TAT)	1,000,000	10,500	5,246	1,059
White Earth Reservation Tribal Council	837,120	20,989	6,491	765

SOURCE: Tiller (1996), except when more recent data were available from the grantee.

<sup>a</sup>The reported Labor Force includes unemployed people who are able to work.

NA = not available.

Tribes; and slightly more than half that of the White Earth Tribe.<sup>5</sup> The labor forces of the Tanana Chiefs Conference and the Kickapoo Tribe are small compared with those of the Cherokee, the Navajo Nation, and the Three Affiliated Tribes. The number of enrolled members ranges from 326 in the Kickapoo Tribe to more than 234,000 in the Navajo Nation. There is corresponding variation in the size of the grantee labor force, ranging from 142 (Tanana Chiefs Conference) to 41,451 (Navajo Nation).

It is common for some (often, many) tribal members to live away from the reservation or tribal lands.<sup>6</sup> In Table I.3, “residents” refers to all people living on or near the reservation, including tribal members, other Indians, and non-Indians. Some reservations (such as Red Lake) have few non-Indian residents, while others (such as Nez Perce) may have more non-Indian residents than tribal members, as a result of the General Allotment Act of 1887, which opened large amounts of tribal lands for homesteading by non-Indians.

## 2. Site Visits

Between August 1999 and April 2000, a two- or three-person team visited each of the 10 WtW grantees in the study sample. The site visit teams collected existing materials (for example, reports, analyses, data compilations) prepared for and by the tribal grantees and interviewed more than 280 key informants (see Table I.4). Because of the broad

TABLE I.4

STUDY INFORMANTS

Grantee	Tribal Officials	Tribal Staff		TANF Staff		Other Partners	State Staff	Employers	WtW Participants	Total
		WtW	Other	Tribal	State/ County					
CIMC	3	4	8	n.a.	5	0	1	3	4	28
Cherokee	3	2	2	n.a.	1	2	3	0	3	16
Kickapoo	3	1	4	n.a.	1	1	3	0	1	14
Klamath	7	2	2	4	0	0	1	2	3	21
Navajo Nation	8	4	10	2	0	2	2	0	3	31
Nez Perce	15	5	9	4	0	6	6	2	6	53
Red Lake	13	2	10	n.a.	3	5	3	4	10	50
TCC	2	2	12	2	0	1	2	0	6	27
TAT	3	3	7	n.a.	1	3	3	2	4	26
White Earth	8	1	6	n.a.	1	1	1	2	0	20
<b>Totals</b>	<b>65</b>	<b>26</b>	<b>70</b>	<b>12</b>	<b>12</b>	<b>21</b>	<b>25</b>	<b>15</b>	<b>40</b>	<b>286</b>

n.a. = Not applicable: tribe does not operate a TANF program.

<sup>5</sup>Many tribes and Native villages maintain a list of members or people enrolled in the tribe or village.

<sup>6</sup>In this report, “reservation” refers to any lands owned by an Indian tribe.

scope of the tribal evaluation, interviews were conducted with state and county officials and private-sector employers located on or near the reservation, as well as with tribal officials, WtW program staff, and staff at other tribal programs (e.g., social services, education, workforce development). In addition, informal discussions were conducted with WtW program participants.

After each site visit, a report summarizing the findings was submitted to the grantee with a request for feedback, including identification of any errors or omissions. The grantee feedback was incorporated in the final report prepared for the tribe. To encourage full disclosure by all study informants, no individual informant is identified in study reports.

## II

### SPECIAL CIRCUMSTANCES OF TRIBES

Tribes have circumstances different from those of other communities in the United States. The legal status of tribes, Indian self-determination and self-governance, historical/cultural factors, and socioeconomic conditions influence economic and business development and associated job creation efforts in Indian country. The special circumstances of tribes affect almost every facet of welfare reform in Indian country.

#### A. LEGAL STATUS OF TRIBES AND INDIAN SELF-DETERMINATION

The legal status of tribes affects their economies, relations with governments (federal, state, county, and local), and relations with private-sector businesses. The legal-political status of Indian tribes is reflected in treaties, legislation, and administrative and judicial decisions. Collectively, these treaties, statutes, and administrative and judicial decisions are often referred to as “Indian law.”<sup>1</sup>

Early in its history, the United States regulated many aspects of Indian affairs, by military conquest, treaty, and legislation. The U.S. government regulated where tribal members could live (for example, reservations), hunt, and fish. Laws were passed that encouraged (or required) tribes to adopt particular forms of government, policies, or procedures.<sup>2</sup> In some cases, children were forced to leave their families to attend Bureau of Indian Affairs (BIA) boarding schools, where non-Indians prescribed the language they spoke, the religion they practiced, and the material they studied.<sup>3</sup> A goal of federal policy was to eliminate the language, traditions, religion, and customs of the tribe and to replace them with those of European descent.<sup>4</sup> The United States also established trust responsibility for Indian tribes. In an 1831 Supreme Court case, Chief Justice John Marshall held that Indian tribes are “distinct political communities that [are] domestic dependent nations” whose “relation to the United States resembles that of a ward to his guardian.”<sup>5</sup>

In the 1970s, federal policy shifted to support Indian self-determination, with passage of the Indian Self-Determination and Education Assistance Act of 1975 (ISEAA). This law was subsequently amended and expanded to promote Indian self-

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<sup>1</sup>See, for example, Cohen (1982).

<sup>2</sup>Indian Reorganization Act of 1934 (25 USC §461-479); Public Law 83-280 of 1953 (18 USC §1321-1326); Indian Civil Rights Act of 1968 (25 USC §1301-1341).

<sup>3</sup>American Indian Policy Review Commission (1997).

<sup>4</sup>American Indian Policy Review Commission (1997).

<sup>5</sup>*Cherokee Nation v. Georgia* (1831).

governance, and a series of presidential proclamations and directives has supported a “government-to-government” relationship between the United States and tribes. Starting in 1975, tribes have had the option of taking over operation of all or a portion of their education and, subsequently, their health programs. In addition, tribes have been able to operate education, training, and employment programs such as JTPA and JOBS, funded by DOL and DHHS, respectively. PRWORA gave the tribes the opportunity to take responsibility for the relatively small WtW and NEW programs, as well as for the relatively large TANF program. At each step, Congress and federal agencies have consulted with tribes and have provided for tribal operation of programs associated with welfare reform.

## **1. Self-Determination and Devolution**

Tribal self-determination has brought welcome opportunities, but also challenges, to tribes, much as it has to states and the federal government.<sup>6</sup> Program responsibilities for social welfare programs have “devolved,” or been shifted, from the federal government to both states and tribes. Both states and tribes have generally welcomed this devolution, because it gives them greater discretion over program eligibility, benefits, and rules, in TANF as well as in other programs. For tribes in particular, however, this devolution brings special challenges:

- Tribes generally lack the information resources and infrastructure that states, counties, and the federal government have. For example, tribes wishing to operate their own TANF program must depend on states for information they need to construct their TANF plan and budget—for example, the number of tribal members (and other Indians living on or near the reservation) currently receiving TANF and receiving Aid to Families with Dependent Children (AFDC) in 1994. Many tribes also lack the information, telecommunication systems, and trained staff required to operate social welfare programs.
- As program resources and responsibilities devolve to tribes, the tribes may lose national, cross-tribal advocates such as the Indian Health Service (IHS) and the BIA. These agencies have advocated on behalf of all tribes to Congress, to the Office of Management and Budget, in courts, and in other venues. As resources and programs devolve from the federal government to individual tribes, national attention to and advocacy on behalf of all tribes may diminish.
- As tribes assume responsibility for and operate TANF and other welfare programs, they must negotiate and work with states and counties, and such negotiations are often difficult. Relations between tribes and states have often been strained, in part because of conflicts over sovereignty and jurisdiction, access to tribal lands by non-Indian state residents, tribal members’ treaty-based rights to hunt, fish, and gather on “off-reservation” land, water rights, mineral rights, and other issues. Tribes have traditionally looked to the federal

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<sup>6</sup>In this context, “tribal self-determination” is broader than the Indian Self-Determination and Education Assistance Act of 1975 (PL 93-638) and refers to broad tribal and federal policies that promote tribal control and self-governance.

government to help resolve such issues. Cooperation between tribes and states on aspects of welfare reform such as child support enforcement and tribal administration of TANF programs must often overcome the historic tensions in state-tribal relations.<sup>7</sup>

Tribal self-determination and self-governance pose challenges and dilemmas for states and the federal government as well. States may not face a legal requirement to support tribal programs, but the progress of tribal self-governance and program operations does create new pressures on states to cooperate in new ways. For the federal government, devolution serves the goal of increasing tribal self-governance, but treaty-based trust responsibilities still require that the federal government fund health, education, and welfare programs or provide goods and services specified in treaties.<sup>8</sup> The federal position on its trust responsibilities inherent in treaties with tribes is complex and subject to changes by Congress.<sup>9</sup>

## **2. Self-Determination and Welfare Reform**

Welfare reform promotes Indian self-determination and self-governance by providing for tribal operation of TANF, NEW, CCDF, CSE, and WtW programs. Many of the WtW grantees in the study also operate NEW programs, JTPA/Workforce Investment Act (WIA), and other programs related to employment and training. All of the WtW grantees in the study have considered submitting a TANF plan to DHHS; of the four grantees that have submitted TANF plans, all have been approved (see Table II.1).

Because of the scope of the TANF program, the resources it requires, and the critical role of TANF for tribal members, the decision to take over operation of a TANF program is an important one for tribes. The Division of Tribal Services (DTS) in ACF is charged with reviewing and approving tribal TANF plans. DTS has supported tribal self-governance by helping tribes plan their own TANF program, and ACF has funded a project to develop materials to help tribes determine the benefits and costs associated with operating the TANF program.

In some instances, the interests of tribes and states may diverge on the issue of tribal TANF. For example, adequate funding of tribal TANF programs depends on state legislatures' willingness to maintain the state matching of federal dollars that was

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<sup>7</sup>While there were treaties and other legal relationships between Indian tribes and European nations and, subsequently, individual American colonies, relations with the United States are expressed in the Constitution under the Indian Commerce clause, article I, section 8, clause 3: "The Congress shall have Power to regulate Commerce with foreign nations, and among the several States, and with Indian Tribes." The Indian Trade and Intercourse Act of 1790 brought nearly all interaction between Indians and non-Indians under federal control.

<sup>8</sup>The United States negotiated formal treaties with individual tribes until the Treaties Statute of 1871 ended that practice.

<sup>9</sup>In *Lone Wolf v. Hitchcock*, the court held that rights established by treaty or other documents can be abrogated by Congress pursuant to its plenary powers.



TABLE II.1

## SELECTED WELFARE-RELATED PROGRAMS OPERATED BY STUDY GRANTEEES

Program	CIMC	Cherokee	Kickapoo	Klamath	Navajo Nation	Nez Perce	Red Lake	TCC	TAT	White Earth
WtW	X	X	X	X	X	X	X	X	X	X
NEW	X	X	X		X	X	X	X	X	X
TANF				X	X	X		X		
CSBG	X	X			X	X		X	X	X
JTPA/WIA A	X	X	X	X	X	X	X	X	X	X
TERO		X		X	X	X	X	X	X	X
VOC. ED.		X	X	X	X	X	X	X	X	X
VOC. REHAB.		X	X	X	X	X	X	X	X	X
BIA GA		X	X	X	X	X	X	X	X	X
DEAP				X		X	X	X	X	X
CCDF		X	X	X	X	X	X	X	X	X

BIA GA = Bureau of Indian Affairs General Assistance  
 CCDF = Child Care Development Fund  
 CIMC = California Indian Manpower Consortium  
 CSBG = Community Services Block Grant  
 DEAP = Direct Employment Assistance Program  
 JTPA/WIA = Job Training Partnership Act/Workforce Investment Act  
 TAT = Three Affiliated Tribes  
 TCC = Tanana Chiefs Conference, Inc.  
 TERO-Tribal Employment Rights Office  
 VOC. ED. = Vocational Education  
 VOC. REHAB. = Vocational Rehabilitation

required in the AFDC program, the precursor to TANF. When a portion of the state's TANF block grant passes to a tribe administering its own TANF program, the state's required Maintenance of Effort level is reduced proportionately based on the fraction of the state's former AFDC caseload that has been transferred to the tribal program. States are not required to pass on any portion of the Maintenance of Effort funds to tribes. Thus, tribal TANF programs could receive substantially lower TANF funding than was directed to tribal members in FY 1994.

The ability to operate a TANF program is especially important to tribal self-governance because TANF is a relatively large program in number of clients served, number of program staff, and total expenditures. For the four tribes in the study that operate TANF programs, the aggregate TANF budget is more than 10 times the total of their WtW budgets.

### 3. Adaptation of TANF Rules

Tribal operation of TANF can improve the fit between eligibility rules, the traditional tribal economy, and special circumstances of the tribe. In some states, TANF rules are not ideally suited to promoting self-sufficiency in some tribal communities. For example, resource limits would make a family with a single car valued at more than a prescribed limit ineligible for assistance, and families could not own more than one car and one snowmobile. Tribes, in taking over TANF, have adjusted resource limits to recognize the role that such equipment plays in survival and subsistence. In Alaska, for

example, native families may traditionally hunt together as a unit, and a family with three children would need more than one snowmobile to fish or hunt game, which may contribute a large share of the family's diet. Tribes have recognized such realities in their eligibility rules when they operate the TANF program.

Provisions of federal laws and regulations can complicate the operation of a tribal TANF program. For example, if more tribal members are currently eligible for TANF than the number receiving AFDC in FY 1994, there will not be enough federal funding to serve them. Tribes depend on states to provide the current TANF and 1994 AFDC utilization data. Without these data from the states, a tribe cannot determine the number of people to be served and whether the level of federal funding would be adequate. Identifying the number of tribal members receiving TANF or participating in other programs often is very difficult, primarily because state, federal, and other programs often do not determine and record a person's tribal membership. Determining the number of tribal members receiving services such as AFDC in 1994 represents an even greater challenge.

Despite these challenges, some indications of the direction of changes in tribal TANF participation are available. Three of the WtW grantees in the study reported significant increases in members eligible for TANF since 1994; one of the grantees reported significantly fewer members eligible for TANF, and the remaining six grantees lacked the necessary data to make such a determination. The increase in eligible TANF participants at the three study sites was attributed by tribal leaders to a worsening in the regional economy, improvements in the identification of tribal members, and inclination among tribal members to use services when they are delivered in culturally sensitive ways through program offices run by tribes on or near the reservation.

#### **4. Political-Legal Status and Barriers It Poses to Business Development and Employment**

The special political-legal status of tribes can contribute to barriers to business development and associated employment in Indian country in the following ways:

- ***Complex Business Site Leasing Process.*** Some reservations are “closed,” (i.e., all land is owned by the tribe rather than by individuals) making it difficult or impossible for a private sector, non-Indian-owned business to purchase or lease land. If leasing land is permitted, the approval process may be complex and time-consuming, requiring years to complete, thus discouraging a business from opening on the reservation. If the land is held in trust by the United States, additional approvals may be required by the Secretary of the Interior, adding to the complexity of the process.
- ***Sovereign Immunity of Tribes.*** Because tribes have sovereign immunity, nontribal businesses and other entities cannot sue them in case of contractual or other disputes. Businesses may fear that they may not obtain a judicial remedy from arbitrary or unfair decisions made by a tribe associated with changes in tribal administration or other factors.

- ***Trust Status of Land.*** Land on a reservation may be held in trust by the federal government and, thus, cannot be bought and sold. Consequently, the tribe cannot use trust land as collateral to obtain a loan from a financial institution. Some businesses have refused to locate on a reservation if they cannot own the land where the business is located.
- ***Dual Taxation.*** While there are federal tax incentives designed to foster economic development on reservations, companies operating on reservations may be subject to dual taxation—by the tribe and by the state in which they are located.
- ***Lack of a Commercial Code Regulating Business.*** A tribe may lack a commercial code (i.e., laws and regulations governing commerce on the reservation). Lack of such a code can discourage banks from financing businesses. It also may discourage commercial development, because potential investors and developers require the structure and security such a code provides. Such concerns are amplified by the sovereign immunity of a tribe.

## **B. SOCIOECONOMIC CIRCUMSTANCES IN INDIAN COUNTRY**

The socioeconomic circumstances of tribes affect the nature of the workforce, and the lack of jobs on many reservations is a serious handicap to moving people from welfare to work. While the circumstances of each tribe are unique, most tribes have experienced economic, education, housing, health, and other problems at levels of severity rarely seen in most other American communities. These problems are long-standing—many generations of American Indians and Alaska Natives have experienced them, and they reflect unique historical and cultural factors, as well as socioeconomic ones. Examples of the difficult socioeconomic circumstances in Indian country include:

- Unemployment on many reservations ranges from 40 to 80 percent.<sup>10</sup>
- Fewer than 9 percent of Indians earn a bachelor's degree or higher (compared with more than 20 percent for all races).<sup>11</sup>
- Almost one-third (32 percent) of Indians had incomes below the poverty level (compared with 13 percent for all races).<sup>12</sup>
- American Indian death rates from accidents, diabetes, liver disease, and tuberculosis are between three and five times that for all races, and the years

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<sup>10</sup>Bureau of Indian Affairs (1997).

<sup>11</sup>U.S. Bureau of the Census (1990).

<sup>12</sup>U.S. Bureau of the Census (1990).

of productive life lost are more than 1.5 times that of all races in the United States.<sup>13</sup>

- Forty percent of reservation housing is considered substandard, compared with 5.9 percent of housing generally; 21 percent of reservation dwellings are overcrowded, and 16 percent lack adequate plumbing.<sup>14,15</sup>

Tribes face the challenges of few jobs and a workforce with substantial personal barriers to employment. Among the study grantees, the percentage of unemployed people in the workforce ranges from 12 percent at Cherokee to 71 percent at Tanana Chiefs Conference, with six of the grantees having more than 50 percent unemployment (see Table II.2). This is more than ten times the national rate of 4.2 percent. In 8 of the 10 study sites, the majority of the workforce has a high school diploma or equivalent, but the percentage of high school graduates in all sites is substantially lower than the national rate of 83 percent. No grantee in the study has a workforce with more than 9 percent having a bachelor's degree or higher, in contrast to the U.S. population, where 25 percent have earned at least a bachelor's degree.

TABLE II.2

GRANTEE LABOR FORCE, EMPLOYMENT, AND POVERTY DATA

Grantee	Labor Force	Percent Unemployed	Percent High School Graduate or Higher	Percent Bachelor's Degree or Higher	Per-Capita Income <sup>a</sup>	Number of TANF Recipients	Percent Below Poverty
CIMC	23,384	n.a.	n.a.	n.a.	n.a.	160	n.a.
Cherokee	2,366	12.0	63	1	\$6,382	87	n.a.
Kickapoo	350	24.0	72	9	\$4,831	10	n.a.
Klamath Tribes	735	42.0	63	3	\$5,672	28	19.0
Navajo Nation	41,451	58.0	41	3	\$11,835	27,000	33.0
Nez Perce	743	64.0	71	1	\$6,102	109	n.a.
Red Lake	871	62.0	65	5	19,390	650	49.0
TCC	142	71.0	64	1	\$6,927	174	43.0
TAT	1,059	61.0	70	1	\$4,849	114	38.0
White Earth	765	55.0	61	1	\$4,917	149	10.0
<b>United States<sup>b</sup></b>	<b>139.4 million</b>	<b>4.2</b>	<b>83</b>	<b>25</b>	<b>\$24,314</b>	<b>5,780,543<sup>c</sup></b>	<b>11.8</b>

n.a. = not available.

Source: Grantees and Tiller (1996).

<sup>a</sup> Income listed for Navajo Nation and Red Lake Tribe is per household (per-capita data unavailable).

<sup>b</sup> U.S. Bureau of the Census. "USA Statistics in Brief, 1999." <http://www.census.gov/statab>. Accessed 4/24/01.

<sup>c</sup> <http://www.acf.dhhs.gov/news/stats/3697.htm>. Accessed 4/24/01.

<sup>13</sup>Indian Health Service (1998).

<sup>14</sup>U.S. Bureau of the Census (1990).

<sup>15</sup>National American Indian Housing Council (1998).

The low level of educational attainment represents a major barrier to employment of tribal members in many jobs in the economy and bodes ill for future employment. The per-capita income at each of the grantees for which data are available was below the poverty rate of \$8,590 (\$10,730 in Alaska) in the year 2000 (the \$11,835 reported for the Navajo Nation is per family, not per capita). The percentage of tribal members with incomes below the poverty level ranges from 10 percent (White Earth) to 49 percent (Red Lake), compared with 11.8 percent for the United States as a whole.

In addition to limiting the transition from welfare to work, the lack of jobs and low income levels have other pernicious effects. Unemployment breeds more than poverty—it contributes to a sense of futility and a cluster of social ills. School dropout rates among Indians are high. Abuse of alcohol and other drugs is widespread; the mortality rate for Indians associated with alcohol-induced chronic liver disease is more than twice that of all races in the United States. Depression is common, and the suicide rate for Indians is 2.8 times greater than that of all races in the United States.<sup>16</sup>

## **1. Barriers to Business Development and Job Creation in Indian Country**

Basic infrastructure components needed to promote and support business development and associated job creation often are absent or underdeveloped in Indian country. The grantees participating in the study provide good examples of how shortcomings in transportation, electricity, telecommunications, computing, and workforce preparation affect economic development and welfare reform in Indian country.

While the emphasis on moving members from welfare to work has encouraged tribes to identify and try to remove barriers to economic development and job creation on tribal lands, significant barriers still exist. 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 in Indian country include:

- ***Remote Location and Inaccessibility.*** Many tribes and Alaska Native villages are located far from urban markets and resources and from major road, rail, and airport facilities. This distance barrier is often compounded by extremes in weather—extreme heat in the summer or extreme cold in the winter—as in the areas served by the Tanana Chiefs Conference (Box II.1). Tribes often lack the infrastructure—such as public transportation, good local roads, and modern telecommunications—needed for economic development.
- ***High Crime Rate.*** High crime rates discourage business investment and development. Most of the study sites reported high crime rates and active youth gangs, and some tribal courts have a large backlog of criminal cases.
- ***Lack of Banks and Capital.*** Because of distance from financial centers and other factors, few financial institutions serve tribes, and few tribal members

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<sup>16</sup>Indian Health Service (1999).

### **BOX II.1: TANANA CHIEFS CONFERENCE, INC. (TCC)—SUBSISTENCE ECONOMY IN AN EXTREME ENVIRONMENT**

In 1996, the TCC service population was estimated at 11,086 people—predominantly Indians, but also including Eskimos and Aleuts. The 43 Alaska Native villages where the majority of the TCC service population resides tend to have fewer than 500 inhabitants.

Most of these villages—spread across an area only slightly smaller than Texas—are hundreds of miles from the nearest city, Fairbanks. They are accessible by bush plane, boat, or snowmobile, but not by road. Lack of transportation is a critical barrier to employment. Few village landing strips can be used after sundown for lack of landing lights.

Life in the villages is harsh. Homes in the villages generally lack indoor plumbing, electricity, and telephones. Most villages have a common source of water (for example, washeteria), and water is hauled to each home from the central source. The climate is subarctic with long, harsh winters and short, warm summers. Summer highs range from 65°F to 80°F; winter lows are well below zero degrees. Extended periods of -30°F are common, as are annual snowfalls exceeding 50 inches.

The economy of most of the TCC villages is subsistence based. It includes hunting (moose, caribou, porcupine, rabbit, and ptarmigan), freshwater fishing, and harvesting berries.

have savings or collateral needed for loans to finance business enterprises. Making matters worse, much of the money that flows into reservations is spent on goods and services available only off the reservation. Study informants estimated that 60 percent of dollars spent by tribes and tribal members are spent off the reservation.

- ***Undesirable Workforce Characteristics.*** Most of the study grantees have relatively small numbers and proportions of highly trained and educated workers and relatively large numbers of people lacking education beyond high school. It is commonly believed that relatively high proportions of people in the workforce have problems with substance abuse and other illnesses such as diabetes. Such workforce characteristics may discourage private-sector employers from investing in a reservation community.

## **2. Cultural-Historical Circumstances of Tribes That Limit Employment and Economic Development**

The historical experience and cultures of tribes affect employment in Indian country. Relevant factors include (1) racism and discrimination against Indians; (2) values and expectations about cultural and environmental preservation, work, and development; and (3) limited English-speaking skills associated with English as a second language.

A history of being the target of exclusion, discrimination, and racist stereotypes can contribute, among Native Americans, to a suspicion about or rejection of non-Indian initiatives, programs, and enterprises. Tribal leaders and program managers at most of the study sites said that relatively few tribal members are employed by non-Indian businesses in “border towns” near reservations. The primary explanations given for low levels of

employment of Indians in border towns were hostile attitudes of non-Indians toward the tribe and its members, rooted in a history of intergroup conflict and competition, racism, and employment discrimination against Indians. Informants described such prejudice and discrimination as less acute in some areas (for example, Alaska, North Carolina) and as more acute in others (for example, Idaho, North Dakota). In general, prejudice and discrimination were given more often as explanations for low levels of off-reservation employment of Indians but less often for low levels of investment in reservation economies.

Conversely, tribal members may have negative views and expectations about non-Indian, off-reservation enterprises and organizations, and these negative views can be a barrier to economic and business development on a reservation. For example, tribal members may see non-Indian, private-sector enterprises as exploiters of Indian resources and people rather than as employers, innovators, and producers. Many study informants expressed concern about protecting the environment from pollution and a desire to conserve tribal lands for the benefit of future generations. This concern is heightened by the sense that reservations seem to attract interests wanting to dispose of medical, radioactive, and other waste products. Thus, before obtaining tribal approval, private-sector investments must pass intense scrutiny to ensure the environment is protected. These considerations have led some tribes to adopt a “do-it-yourself” approach to business development and job creation, preferring to develop enterprises without outside partners or to limit the roles these partners play.

The tribes in this study did not focus in their economic development plans on sales of goods or services to federal or state agencies, despite federal legislation and policies promoting such sales. For example, all federally recognized tribes are included in “historically underutilized business zones” (HUBZones). Participants in this program can receive federal contracts through competitions limited to qualified HUBZone firms, or on a sole-source basis. HUBZone firms are also given a price preference in bidding during full and open competition over non-HUBZone large firms. A similar federal program, the SBA 8(a) program for minority-owned business, has special inducements for tribal participation. However, the HUBZone and 8(a) programs did not appear to play an important role in the economic development plans of the tribes or consortia in the study.

Informants at each study site stressed the importance of preserving the tribal culture and identity. These values go hand in hand with the desire for self-determination and self-governance and can sometimes pose a barrier to business and economic development on the reservation. Study informants expressed concerns that, without strict tribal control, economic and business development might be hostile to (or inadvertently damage) traditional tribal culture and values. Tribal culture is often seen as fragile and still recovering from systematic past efforts by both private sector and governmental interests to eliminate it.<sup>17</sup>

While most American Indians and Alaska Natives speak English as their first language, there are those for whom English is a second language and who have limited English-language skills. Considerable variation exists in the degree to which English is

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<sup>17</sup>Indian Health Service (1999).

the language of choice in Indian country. In many tribes, most members use English almost exclusively. In other tribes, most members use the native language. In the study sample, English was not the preferred language for many members of the Alaska Native villages comprising Tanana Chiefs Conference and for members of the Navajo Nation. When combined with low levels of education, the lack of English-speaking skills can represent a critical barrier to employment of tribal members.

Finally, there is a paradox of high unemployment, low income, and wealth for some tribes. For example, unemployment is very high in some Alaska Native villages, but many villagers are stockholders in multimillion-dollar Native corporations. In accordance with the Alaska Native Claims Settlement Act of 1971 (ANCSA), tribes and Native villages in Alaska have formed 13 regional for-profit Native corporations (e.g., Bristol Bay Native Corporation, Doyon, Limited, Arctic Slope Regional Corporation). The revenues of some of the regional Native corporations approach \$1 billion, and they have invested in or purchased enterprises throughout the United States. Despite the success of many of the corporations, relatively few jobs have been created in the Alaska Native villages; rather, jobs tend to be created in cities, where there is greater demand for goods and services. Furthermore, with the aim of making profits for their stockholders, Native corporations have made investments outside of Alaska. The annual dividends paid to stockholders remain modest, generally less than \$2,000 per stockholder. On some reservations, gaming has produced wealth for the tribe and has created jobs; however, especially for large tribes, the number of jobs created by gaming enterprises may be small in relation to the number of unemployed or underemployed tribal members.

### **3. Tribal Efforts to Overcome Barriers to Economic Development**

Tribes have long worked to foster economic development. For example, archeological and historical evidence shows that extensive trading took place among tribes before the arrival of Europeans to the Americas, and there was extensive trading between tribes and early European settlers. The loss of land and resources and the forced removal to reservations dealt crushing blows to most tribal economies and fostered a dependence on federal welfare programs.<sup>18</sup> In more recent times, tribes have developed overall economic development plans with the support of federal agencies such as the Economic Development Administration and Minority Business Development Administration (in the U.S. Department of Commerce), and the Small Business Administration.

Despite many obstacles, tribal economic development efforts often have been innovative and bold. Many of these efforts have produced sorely needed revenues for the tribes. Nevertheless, the current pace of job creation compared to the number of jobs needed suggests that, for many years to come, a lack of jobs will continue to prevent many TANF recipients and others from securing unsubsidized employment.

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<sup>18</sup>American Indian Policy Review Commission (1997).



The most successful examples of economic development in Indian country include gaming and tourism. All of the WtW grantees in the study (except for the two consortia) had considered developing gaming operations.<sup>19</sup> One of the tribes has rejected the development of gaming, and the other seven tribes have implemented gaming operations. Of the seven tribes that implemented gaming, four have achieved modest success, one has been extremely successful, and two appeared on the verge of achieving high levels of success. For the Cherokee, the tribal economy has been and continues to be transformed by the success of its gaming operations (Box II.2). Even for the Cherokee, however, unemployment on the reservation still exceeded 12 percent in 1998.

Some tribes have successful, even economy-transforming, gaming operations, but many tribal gaming operations have been unsuccessful or have experienced only modest success. Location seems to be critical to the success of tribal gaming operations. Factors related to location are (1) the proximity of urban population centers to the casino, (2) the presence of other tourist attractions near the casino, and (3) the availability of alternate gaming venues. The success of gaming tends to be limited for tribes distant from urban centers and for tribes near alternate gaming facilities. Conversely, gaming tends to be successful for tribes with casinos located near nongaming tourist attractions. For example, the highly successful Cherokee casino is within a day's drive of population centers such as Knoxville, Tennessee; Asheville, North Carolina; and Atlanta, Georgia. It is located near the country's most-visited national park (Great Smoky Mountains

**BOX II.2: EASTERN BAND OF CHEROKEE INDIANS (EBCI)—  
SURGING ECONOMY REDUCES UNEMPLOYMENT**

Until the 1990s, the Cherokee faced circumstances that blocked movement from welfare to work for many tribal members. There were few paying jobs on or near the reservation, many unemployed Cherokee had less than a high school degree or equivalent, and job creation and economic development were sluggish (as they were for the rural North Carolina counties surrounding the reservation). For many years, the tribe had operated a small bingo operation; after court decisions in the 1970s and 1980s limited states' regulation of gaming on Indian reservations, the tribe expanded its bingo operation and began to market it to the public. The enhanced bingo operation was so successful that the tribe built a 60,000-square-foot casino, which has yielded millions of dollars of profits each year for the tribe.

The tribe and the casino have become the largest employers in the five counties contiguous with the reservation. The casino has transformed the Cherokee economy, drawing thousands of customers each day, and stimulating the creation of a variety of service businesses such as hotels and motels, restaurants, and grocery stores. These businesses, in turn, have triggered the birth of other businesses that supply needed goods and services. By 1998, the casino and related businesses helped to drive the unemployment rate among the Cherokee from more than 50 percent to about 12 percent (although this is a figure still more than twice that of the national rate in 1998).

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<sup>19</sup>Two of the WtW grantees in the study—TCC and CIMC—were tribal consortia. Neither TCC nor any of its members had gaming operations. Several members of CIMC had implemented gaming operations, but CIMC as a consortium organization had not.

National Park), and the park brings many potential customers to the area. Finally, there are few other gaming operations near the casino that compete with it for customers.

At Cherokee, gaming has been associated with unprecedented growth and job creation in the reservation economy. Although many casino jobs are entry- and mid-level, the casino has stimulated many other jobs in the service and retail sectors. The effects of a successful casino can reverberate throughout the reservation. At Cherokee, there are about 50 motels in the area, 15 of which have opened in the past five years. In the past year, a number of restaurants and a supermarket have opened. These new establishments are adding a substantial number of jobs. The casino has generated unprecedented profits, and the tribe uses these profits to improve programs and infrastructure, to finance economic development initiatives, and to provide modest per-capita payments to tribal members.

Other tribal casinos have been successful also. While theirs are not as successful as the Cherokee casino, White Earth, Klamath, and Nez Perce have rapidly growing casinos and associated developments. The casino operated by the Kickapoo Tribe of Kansas provides a wide range of jobs, including those for dealers, food service workers, and tellers. Casino jobs at Kickapoo have good salaries and benefits (100 percent of health insurance cost is paid for employees, as well as 80 percent for dental, eye, and prescription coverage). The Kickapoo casino has been a source of jobs for nontribal community members as well—respondents at Kickapoo indicated that some local farmers who have gone bankrupt have taken casino jobs.

Other promising approaches to economic development and job creation in the study sites include:

- ***Applications of Advances in Science, Technology, Engineering, and Construction to Tribal Enterprises.*** Several tribes in the study had applied or were applying advances to the operation of a wide range of business activities. For example, both Red Lake and Cherokee were applying modern approaches to aquaculture and preservation of fisheries; Nez Perce employ advanced breeding and veterinary approaches to maintaining the Appaloosa breed of horses. Red Lake and Three Affiliated Tribes are applying sophisticated manufacturing to the construction of modular homes and aircraft components, respectively.
- ***Development of Key Infrastructure.*** The federal government and private sector enterprises are helping tribes develop infrastructure needed to support economic development in the vast areas some tribes inhabit (Box II.3). Projects include satellite-based and cellular telecommunications, sanitation facilities, and transportation infrastructure. For example, roads and landing strips funded by the federal government have dramatically improved access by airplane to Alaska Native villages. Air travel is now the principal mode of transportation between the villages and urban centers and is used for shipping supplies, travel, and tourism. The Navajo Nation, Three Affiliated Tribes, and White Earth operate community colleges that use satellite and Internet-based systems for distance learning.

### **BOX II.3: NAVAJO NATION—VAST AREA, LARGE POPULATION, FEW JOBS**

The Navajo Nation includes portions of Arizona, New Mexico, and Utah, as well as three quasi-autonomous satellite reservations in New Mexico. The Navajo Nation is vast (roughly the size of West Virginia). It includes arid deserts, alpine forests, high plateaus, mesas, and mountains as high as 10,500 feet. Most of the 234,000 Navajos on the reservation live in traditional hogans, without indoor plumbing, electricity, or telephone service.

While Interstate 40 passes through the southeast corner of the Nation and U.S. highways 160 and 191 pass through the reservation, many of the roads between Navajo communities are unpaved. There is no public transportation on the reservation. Consequently, lack of transportation is a critical barrier to employment on the reservation.

The reservation has significant amounts of natural resources, including timber, coal, uranium, and land suitable for agribusiness. While all of these resources are being developed, there are far fewer jobs available than people looking for work.

These initiatives have improved economic prospects and created jobs on some reservations. However, the slow pace of economic development in Indian country stymies the goal of welfare reform—moving people from welfare to work. As described later in this report, dedicated efforts by TANF, WtW, NEW and other programs operated by states and by tribes have made some progress in identifying and removing barriers to the employment of American Indians and Alaska Natives residing on or near reservations. To a great extent, however, these efforts have been unable to place large numbers of program participants in unsubsidized employment. The result is that many tribal welfare recipients are now ready and willing to work, but few jobs are available.

### III

## FRAMEWORK AND IMPLEMENTATION OF THE TRIBAL WELFARE-TO-WORK PROGRAM

Tribal circumstances present unique challenges to WtW programs. Tribes are taking on more responsibility for social services and employment programs. In doing so, they are developing new and stronger interagency relationships and working to improve the infrastructure for services to program participants. To provide the context necessary for understanding the implementation of WtW in Indian country, this chapter describes the legislative basis, funding, structure, and staffing of the tribal WtW program, as well as program participation. The next chapter discusses the services provided by tribal WtW programs and service coordination.

### A. LEGISLATIVE BASIS<sup>1</sup>

To reinforce the purpose of WtW grants, Congress established eligibility criteria and spending rules to ensure that the funds are used primarily for individuals who have serious disadvantages in the labor market. As originally enacted, the BBA required that WtW grantees spend at least 70 percent of their grant funds on (1) long-term TANF recipients or recipients within a year of reaching a TANF time limit, who also have two of three specified barriers to employment; or (2) noncustodial parents of children in a long-term TANF case, who themselves face two of the three specified barriers. The three problems specified in the original language of the BBA were (1) lack of a high school diploma or GED *and* low reading or math skills, (2) a substance abuse problem, and (3) a poor work history. The remaining grant funds (30 percent or less) could be spent on people who met less stringent criteria: TANF recipients (or noncustodial parents of TANF recipients) who have characteristics associated with long-term welfare dependence (such as being a school dropout or teenage parent), or who have a poor work history. These eligibility criteria applied to the general WtW program, as well as to tribal WtW grantees.

#### 1. Special Tribal Provisions and Exceptions

Special provisions of the tribal TANF, WtW, and other employment and training programs affect the implementation of tribal WtW programs. These provisions relate to the allocation and use of funds, time limits, and work activities. In amending the Social Security Act (42UCS608), Congress, recognizing the difficulty many tribes face, required both state and tribal TANF programs to disregard from the 60-month limit on TANF benefits any month during which an adult lives in Indian country where at least 50

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<sup>1</sup>This section is adapted from Chapter I of the report also prepared as part of this evaluation: “Program Structure and Service Delivery in Eleven Welfare-to-Work Grant Programs” (Nightingale, January 2001).

percent of the adults are not employed.<sup>2</sup> In general, DHHS regulations governing tribal WtW and TANF programs are flexible, with the aim of enabling tribes to tailor their programs to meet the needs of their service populations. For example, tribal WtW grantees are allowed to spend up to 20 percent of their grant funds on administrative costs (instead of being held to the 15 percent limit that applies to nontribal WtW grantees). Tribal WtW, TANF, and/or NEW programs also have flexibility in defining the program service area, service population, and work activities, and in selecting the supportive services to be provided, such as child care and transportation assistance. Tribes can choose to provide TANF services themselves, or to obtain these services from the state(s) or from another tribe.

With the creation of the TANF block grant program, the existing JOBS programs were terminated, except for those serving the tribes. The NEW program replaced the tribal JOBS program. The NEW program provides funding for tribes and intertribal consortia to administer tribal work activities programs in fiscal years 1997 through 2002.

Tribes can have additional flexibility in their use of employment and training funds. The Indian Employment, Training and Related Services Demonstration Act of 1992 (Public Law 102-477) allows tribes, at their option, to combine the formula funds they receive for a variety of employment, training, education, and related services from federal agencies, including DOL, DHHS, Education, and BIA. Under “477,” tribes develop a plan, written to meet tribally defined goals. Tribes decide which programs they will include in their 477 plans. Funding under each of the federal programs involved (e.g., JTPA, a number of BIA employment and education programs, JOBS/NEW, and the Child Care and Development Block Grant)—can go into a single budget. There is a single plan, a single annual report, and a relationship with a single federal agency, BIA. However, there are limits on the flexibility accorded to 477 programs. For some programs, such as TANF, reports are required by statute. In addition, 477 program funds must be administered in such a manner as to allow determination that funds from different federal sources are spent on activities allowable under the funding source or program. The Secretary of the affected federal agency may (or may not) waive for a 477 program any requirement, regulation, policy, or procedure mandated by the agency. Furthermore, the Secretary (of a federal department) may deny a waiver of departmental regulations and requirements for 477 programs if the Secretary determines such a waiver would be inconsistent with the purposes of PL 102-477, or inconsistent with provisions of the statute, specifically applicable to Indian programs, that authorizes the program in question.

There has been some disagreement between tribes and some federal agencies with respect to reporting and other requirements of tribal 477 programs. Federal program staff tends to favor the provision of timely and responsible accounting and reporting of activities and services provided with federal funds. Tribal 477 grantees tend to favor

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<sup>2</sup>The distinction between the unemployment and “not working” rates is important. The unemployment rate is the quotient of the number of unemployed people able to work divided by the number of employed people. The “not working” rate is the quotient of the number of unemployed people able to work plus those unemployed but not looking for work divided by the number of employed people. Thus, the “not working” rate is always equal to or greater than the unemployment rate.

treating 477 funding streams like a block grant, with minimal accounting and reporting to the particular funding agencies.

## 2. Changes in the WtW Legislation

As WtW grant programs were being implemented beginning in 1999, it became clear that the strict eligibility criteria and the “70-30” spending requirement were contributing to slow enrollment. In response, Congress modified the WtW legislation in 1999 as part of the FY 2000 appropriations legislation for DOL, DHHS, the U.S. Department of Education (ED), and related agencies. The amendments left in place the requirement that 70 percent of WtW funds be spent on a defined category of participants, and the “70-30” spending requirement still applies to tribal WtW programs, except for those tribes that have incorporated WtW into a 477 plan. However, to make it easier for TANF recipients and noncustodial parents to qualify for WtW services under the 70 percent category, the amendments broadened the population in two ways:

1. ***TANF participants qualify simply by being long-term recipients.*** The amendments removed the requirement that long-term TANF recipients exhibit additional barriers to employment. TANF recipients are eligible if they have received assistance for at least 30 months, are within 12 months of reaching a time limit, or have exhausted their TANF benefits due to time limits.
2. ***Noncustodial parents qualify under less restrictive rules.*** Noncustodial parents are eligible if they meet each of three criteria: (1) they are unemployed, are underemployed, or are having difficulty making child support payments; (2) the custodial parent or minor child is a long-term TANF recipient, or the minor child received TANF in the past year, or the minor child is eligible for or receives assistance under the Food Stamp, Supplemental Security Income, Medicaid, or CHIP programs; and (3) they make a commitment to establish paternity, pay child support, and participate in services to improve their prospects for employment and paying child support.

The definition of the 30 percent category was also broadened to include youths 18 to 24 years of age who received foster care prior to age 18, custodial parents (regardless of TANF status) with income below the poverty level, and TANF recipients who face other barriers to employment specified by states in consultation with the local Workforce Investment Board (WIB).<sup>3</sup> Other program changes were also made that expand the types of services allowed and simplify some administrative requirements: (1) allowing WtW funds to be used for preemployment vocational education and job training for up to six calendar months; (2) allowing grantees that are not WIBs to provide job readiness, placement, and postemployment services directly rather than only through contracts or vouchers; (3) streamlining reporting requirements; and (4) permitting child support enforcement agencies to share certain information on noncustodial parents with WIBs, to help the WIBs contact and recruit individuals about participation in the WtW program.

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<sup>3</sup>Under WIA, tribes are authorized to participate in WIBs; however, at only one of the study sites, the Nez Perce Tribe, was the tribe actively involved with the local WIB.

## B. PROGRAM FUNDING

Congress appropriated \$30 million for tribal WtW programs, \$15 million each for FY 1998 and FY 1999. DINAP awarded the tribal WtW grants. It received proposals from 94 tribes and consortia and funded each proposal according to a funding formula based on the percentage of adult tribal members at or below the poverty level in relation to adults at or below poverty on all reservations.

In FY 1999, the amount of tribal WtW grants ranged from \$9,689 to \$2,530,161. The amounts of the grants for the 10 grantees participating in this study ranged from \$41,009 (Kickapoo Tribe) to \$2,530,161 (Navajo Nation) (see Table III.1). While the amount of the award can exceed \$2 million for large tribes or consortia, the WtW grants are small compared to the TANF program and to the number of unemployed tribal members. For example, the largest tribe, the Navajo Nation, has a population of approximately 235,000 members residing on or near the reservation. Estimates of the number of people 18 years old or older without a paying job range from 51,478 to 112,059. The amount of WtW funds of the Navajo Nation WtW grant (\$2,530,161) yields between \$22.58 and \$49.15 per unemployed adult on the reservation. At Tanana Chiefs Conference, one of the two tribal consortia in the study, about 6,195 people reside in the 43 Alaska Native villages that constitute the consortium. Of these 6,195 Native villagers, 3,394 are estimated to be unemployed adults. The WtW grant to Tanana Chiefs Conference (\$183,074) yields about \$53.94 per unemployed adult.

TABLE III.1

### GRANTEE TANF, WTW, AND NEW FUNDING

Grantee	TANF Funding	FY 98 WtW Funding	FY 99 WtW Funding	NEW Funding
Cherokee (EBCI)	n.a.	137,415	146,459	90,000
CIMC	n.a.	1,159,094	1,177,533	998,592
Kickapoo Tribe	n.a.	38,607	41,009	27,264
The Klamath Tribes	464,459	48,948	43,953	0
Navajo Nation	31,171,746	2,294,364	2,530,161	1,752,666
Nez Perce Tribe	504,990	n.a.	49,966	34,752
Red Lake	n.a.	228,195	267,288	135,000
Tanana Chiefs Conference (TCC)	2,443,973	192,346	183,074	159,115
Three Affiliated Tribes (TAT)	n.a.	59,634	84,580	0
White Earth	n.a.	265,424	281,934	192,415

n.a. = Not applicable: grantee does not operate TANF program.

## **C. PROGRAM STRUCTURE**

Programs authorized under PRWORA, as well as long-standing tribal programs, provide services related to the objectives of WtW. None of the 10 grantees in the study operated its WtW program independently from other employment and training programs. Each grantee provided services funded by the WtW grant as part of an existing employment-related program and used WtW funds to enhance and expand the services provided. For small tribes (for example, Kickapoo, Nez Perce, Klamath), the WtW funding level was sufficient to pay the wages of one staff member or a portion of the wages for several staff members, with the remaining funds used to provide services (described in Chapter IV).

The use of WtW funds varied, depending on whether the tribe operated a 477 program or a tribal TANF program. The seven grantees in the study that did not operate 477 programs used WtW funds to expand or enhance employment and training services specifically for WtW-eligible participants. Tribes that operated integrated 477 programs (three study grantees) used WtW funds to expand or enhance services in accordance with the goals of their 477 plans.

### **1. Organizational Placement of the WtW Program**

Most tribes have an agency or department responsible for helping tribal members become job ready and obtain employment. Most WtW grantees provide a range of employment-related services drawing on funds from different programs such as NEW and JTPA and from child care funding sources as appropriate and allowed. Depending on the size of the tribe, one person or office may administer the WtW, NEW, and JTPA programs (for example, Kickapoo), or many employees may be stationed at a variety of sites operating the programs (for example, Navajo Nation, California Indian Manpower Consortium, Tanana Chiefs Conference).

Tribal employment and training agencies have multiple sources of funding. They include federal programs (for example, JTPA, NEW, Summer Youth Employment, WtW), state programs, and direct tribal funding. These agencies coordinate services and activities (for example, vocational education, adult education, social services, housing, substance abuse) with other tribal programs. They also coordinate services and activities with state programs, federal programs operated by states or counties (for example, unemployment insurance, TANF, food stamps), other federal programs (for example, Social Security, AmeriCorps, Job Corps), and private-sector employers and nonprofit organizations (for example, Goodwill Industries, faith-based organizations).

The place of the employment and training agency (E&T) within the tribe's organizational structure varies. For 8 of the 10 grantees in the study, the E&T agency is a component of a larger department or division (such as workforce development, human resources, employment, education, or labor). For two of the grantees (California Indian Manpower Consortium and Red Lake), the E&T agency is independent, reporting only to the head of the executive branch (tribal chairman, governor, president, chief, executive director) and to the tribal legislature (tribal council, business committee, corporation board).



## **2. WtW Programs Operated as Part of a 477 Program**

Three of the grantees in the study (Nez Perce, Three Affiliated Tribes, White Earth) operate 477 programs that include WtW funding. When WtW funding is incorporated in a 477 program, there may be no distinct WtW program component; as with other 477 program funding, the WtW funds may be reprogrammed to meet the 477 program goals. Each of the three 477 programs in the study is operated under a tribal agency or department such as education, Tribal Employment Rights Office (TERO), or the tribal college.

The 477 program represents a dramatic departure from the way tribes traditionally have administered federally funded programs. Using the 477 approach, a tribe can combine funding from different federal programs without having to adhere to some of the limitations and requirements associated with specific programs or funding agencies. The tribe can define and deliver a set of integrated services in accordance with the tribe's goals and priorities. The 477 tribes in the study used service integration and case management approaches to administer unique programs. To do so, they drew on funding from WtW, NEW, vocational education, vocational rehabilitation, adult education, and other programs funded by ED, DHHS, the Department of the Interior, and DOL.<sup>4</sup>

While incorporating WtW, TANF, and other related programs into a 477 program has potential advantages, some problems have been encountered. The 477 approach can facilitate the development of a one-stop approach, as well as pooling of funds/resources to meet tribally determined goals. Support services, employment, training, child care, and other services or activities can be managed directly in conjunction with the TANF program. If each program is operated separately (outside 477), then the tribal units often have to implement some system of linkages, which can make service integration more difficult, although still possible. On the other hand, some problems have occurred in the release of FY 2002 NEW and CCDF funds to the 477 tribes through the BIA; in addition, some federal program administrators have raised concerns about the adequacy of 477 grantee annual reports to demonstrate that federal funds have been expended in accordance with statutory or regulatory mandates. Tribal and federal informants reported that annual 477 reports had been expanded over the years to meet some of these concerns.

The Indian and Native American Employment and Training Coalition (INAETC) offers technical assistance to tribes that want to determine the advantages and disadvantages of implementing a 477 program. INAETC works with DINAP in DOL and the BIA to obtain and distribute information to tribes pertaining to employment, training, and other welfare-related programs.

While about one-third of the tribes that operate TANF programs operate them under the 477 program, none of the tribes in this study had done so. PRWORA requires tribal TANF programs operated under a PL 102-477, like all other TANF programs, to submit TANF reports. Therefore, one advantage of program integration under 477 is not gained with regard to TANF, a factor that may contribute to some tribes' decision not to incorporate TANF in a 477 program.

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<sup>4</sup>WIA authorizes tribes to consolidate WtW funds in accordance with PL 102-477.

Tribes in the study that participate in the 477 program were enthusiastic about it. Informants said that the 477 approach promotes Indian self-determination and self-governance, as well as service integration. These tribes had reassessed their goals and priorities with respect to education, training, and employment as part of designing and developing their 477 programs. They reported that they were better able to develop comprehensive approaches to interrelated education, employment, and training problems and conditions less fettered by the priorities, requirements, and approaches specified by separate programs and agencies.

### **3. Tribal Operation of WtW and TANF Programs**

For tribes, the TANF program dwarfs the WtW and NEW programs—a tribe's TANF grant is often more than 10 times greater than its WtW or NEW grant. Moreover, TANF is likely to continue to exist (especially in Indian country, with its high levels of unemployment), whereas WtW funding was available for only two federal funding cycles. The size and resources required to run a TANF program have deterred many tribes and tribal consortia from taking over TANF operation. However, tribal operation of TANF is also seen as a solution to difficulties in coordinating services with state TANF programs or differences in interpretation or application of state TANF rules to the tribe.

Although tribal takeover of TANF can improve service integration for tribal members, there is also a risk of at least temporary inefficiencies in program administration. Tribal takeover of TANF, combined with a tribal WtW grant, extends the range of program resources that can be provided to tribal members in a closely coordinated fashion consistent with tribal traditions and values. On the other hand, it is difficult to integrate information resources for WtW and TANF with the other tribal programs. In some cases, WtW and TANF staff develop separate information systems that are not designed with future integration in mind. This sometimes leads to incongruous results. A tribal TANF client may report a change of address to a WtW case manager, but it is not communicated to the TANF files; consequently, a TANF check may be mailed to an incorrect address. Basic information on tribal clients can be redundantly entered by several different staffs to separate systems.

In the sites examined for this study, tribal TANF and WtW programs operate out of separate agencies. Four of the grantees (Klamath, Navajo Nation, Nez Perce, and Tanana Chiefs Conference) operate a TANF program. In keeping with the intent of the WtW legislation, their WtW programs are administered through workforce agencies rather than welfare agencies, just as is true for state WtW grantees. Staff at the tribal E&T program (partially funded by the WtW grant) and TANF staff do not report to the same program manager, and at each of the four tribal TANF grantees, the TANF and E&T programs are in different departments or agencies. This separation can impede coordination and integration of the services and activities of the TANF and WtW programs. For example, at Klamath, the TANF and WtW offices are in communities more than 20 miles apart, and it is difficult for tribal members to travel from one office to the other. On the other hand, at Tanana Chiefs Conference, the WtW and TANF staffs are at least located in the same facility.

The administration of TANF and WtW programs by different tribal departments or agencies sometimes impedes welfare reform implementation efforts. For the tribes in the study, TANF tends to come under the aegis or influence of tribal social services programs, whereas WtW tends to come under the aegis of E&T or workforce development programs. While tribal officials and program managers embrace the goal of moving TANF recipients from welfare to work, it is difficult to restructure long-standing departments, programs, responsibilities, and ways of providing services. Such reorganization requires agreement among tribal members, the tribal council, and tribal administrators, as well as the expenditure of resources that are scarce for many tribes.

#### **4. Program and Service Coordination**

Program coordination presents a special challenge to tribes. In addition to internal coordination with other tribal services, tribal WtW programs must coordinate their activities with state- and county-administered programs, especially TANF. In addition, many tribes face constraints not faced by states or counties that limit service coordination (e.g., lack of economy of scale associated with small population size, challenges of enforcing child support orders of noncustodial parents residing and/or working off the reservation, and distance from state and county offices). Some tribal grantees in the study have developed promising strategies to address these constraints. These include (1) developing strategies for improved coordination with state/county TANF agencies, (2) combining program goals and funding under the 477 program, (3) coordinating with state agencies for child support enforcement, and (4) forming tribal consortia to improve operating efficiency.

Service coordination and integration have been the motivation for one-stop centers that promote a single application or intake process for multiple programs.<sup>5</sup> The unified intake permits application and eligibility determination for a range of services and programs funded by different federal agencies and departments, including food stamps, WtW, TANF, child support, transportation, and housing services. However, a tribal one-stop center generally cannot integrate services or programs that the tribe does not manage. Consequently, except for tribes operating TANF, none of the tribal programs in the study operated true one-stop centers. For example, if the tribe does not operate a TANF program, it cannot manage enrollment of tribal members in TANF and cannot integrate tribal services with TANF. Often, state or county one-stop centers are located far from tribal programs, making it difficult for tribal members to get to the center and for tribal staff members to coordinate with it. Service coordination is further limited because tribal staff members are often prohibited from accessing critical state or federal data needed for eligibility determination.

Several states where tribal study sites are located have addressed this disconnect between state TANF and tribal programs through co-location or outstationing of state staff at tribal programs. Alaska, Arizona, Minnesota, and North Dakota, or counties in these states, station TANF and other program staff on the reservation to serve tribal members. The state of Alaska took the innovative step of stationing state employees at

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<sup>5</sup>One-stops are authorized by the Workforce Investment Act (WIA) of 1998.

the Tanana Chiefs Conference facility in Fairbanks to facilitate service coordination and provide convenient access to services. State staff at the Tanana Chiefs Conference facility also serve nontribal Alaska residents. The presence of state staff at the Tanana Chiefs Conference facility creates a one-stop center. The operation of one-stop centers serving all eligible citizens at a tribal facility improves the quality and efficiency of services provided to both tribal members and state residents. It is also a testament to cooperation and collaboration between the state and tribe.

Some state TANF programs may not provide the full complement of services to tribal members residing on reservations with high levels of unemployment. Some study informants said that state programs make little or no attempt to train and place TANF recipients who receive waivers from the 60-month lifetime limit as a result of residing on reservations where the not-working rate exceeds 50 percent. On such reservations, business and economic development are prerequisites for moving TANF recipients from welfare to work. Nevertheless, informants said that TANF, WtW, and other programs should provide skills enhancement, job training, work experience and other services to TANF recipients to help them to become ready and able to work when work becomes available.

#### **D. PROGRAM PARTICIPATION**

Tribal WtW programs attempt to respond to large needs but are modest in scale. Given the high rates of unemployment, welfare dependency, and poverty on many Indian reservations across the country, substantial numbers of tribal members on the reservations visited as part of this study were in need of WtW services to help make the transition from long-term dependency on welfare to self-sufficiency. However, the WtW programs visited as part of this study were modest in size and typically served small numbers of tribal members living both on and off the reservations.

Relative to the total populations living on or near the reservation, the proposed and actual numbers of tribal members enrolled in WtW initiatives were small. As Table III.2 shows, the size of the reservations varied substantially, both in total tribal population and in the tribal TANF populations from which to recruit WtW participants. One site, the Navajo Nation—the largest tribe in the United States—was an outlier, with a tribal population of 234,786 living on or near the reservation. Among the other nine sites, the numbers of tribal members living on or near the reservation ranged from 34,000 (California Indian Manpower Consortium) to less than 500 (Kickapoo Tribe).

The proposed number of TANF recipients to be served by the 10 WtW grantees included in the study sample ranged from 6 WtW-eligible individuals (Kickapoo Tribe) to 425 (California Indian Manpower Consortium). As a percentage of total tribal members, the participation goals ranged from less than one percent of tribal members living on or near the reservation (at five reservations) to five percent (at two reservations). While four sites planned to serve more than 200 participants, the other six sites planned to serve 30 or fewer individuals. These small programs all had FY 1999 WtW grants of less than \$300,000.

TABLE III.2

## PARTICIPATION IN TRIBAL WTW (FY 1998)

	TCC	Nez Perce	Navajo Nation	CIMC	White Earth	Kickapoo	TAT	Klamath	Cherokee	Red Lake
<b>Estimated Population</b>										
Tribal Members (on or Near Reservation)	6,195	16,159	234,786	34,000	6,491	478	5,246	3,748	6,311	7,974
Estimated TANF Population	174	109	27,000	160	149	10	114	28	87	650
<b>Participants</b>										
WtW Participant Goal	250	30	230	425	30	20	20	25	6	400
Goal as Percent of Members	5%	1%	1%	1%	1%	4%	1%	1%	1%	5%
WtW Participants Served	681	25	104	82	NA	32	NA	36	16	109
Served as Percent of Members	12%	1%	1%	1%	NA	7%	NA	1%	1%	1%
Served as Percent of Goal	272%	83%	45%	19%	NA	160%	NA	144%	267%	27%

Note: Percentages shown as 1% are between 0% and 1%.

NA = not available. WtW is incorporated in PL 102-477 program; data not broken out for WtW program.

Actual participation in WtW was also small. Participation figures for FY 1998 were available for 8 of the 10 study sites.<sup>6</sup> In those eight sites, the number of participants served range from 16 participants (Cherokee) to 681 participants (Tanana Chiefs Conference). Except for Tanana Chiefs Conference, the programs served fewer than 110 participants, with four of the eight sites serving fewer than 40 participants. The number of WtW participants served in six of the eight sites visited was one percent or less of the total tribal members living on or near the reservation. The numbers served as a percent of total tribal members were considerably higher at Tanana Chiefs Conference (12 percent of tribal members) and the Kickapoo Tribe (7 percent), although the total number of Kickapoo tribal members is very small. Low participation figures imply higher cost per participant than more urbanized programs, and probably reflect special circumstances such as low population density, severity of barriers to employment, and remote location.

At the time of our site visits, four of the eight sites (for which data are available on participation levels) had exceeded their participation goals. For example, Tanana Chiefs Conference and Cherokee had served more than twice the number of individuals they had originally set as their participation goals. Three sites had served less than half of their original participation goals. As discussed in the following chapter, most sites experienced at least some difficulty (and some sites experienced major difficulty) in identifying and recruiting individuals eligible for WtW (especially under the original 70 percent eligibility criteria), in certifying WtW eligibility, or in getting individuals to enroll and stay involved in program services.

<sup>6</sup>WtW participant data were not reported by two of the tribes participating in the PL 102-477 program (Three Affiliated Tribes and White Earth); some participant data were reported by the Nez Perce Tribe for one year (year 1) before the tribe began to participate in the "477" program. "477" tribes are not required to report WtW participation separately.

## IV

### PROGRAM SERVICES

**A**t the core of the tribal WtW programs are the services provided to help participants overcome barriers to employment, secure jobs, and make the transition from welfare to work and self-sufficiency. The tribal programs visited for this study use a range of service delivery approaches to help WtW-eligible tribal members overcome serious barriers to employment (for example, lack of accessible child care, lack of basic skills and job-specific skills, substance abuse problems, and transportation difficulties). This chapter describes how tribal WtW programs recruit eligible individuals, perform intake and assessment, and manage and track participants throughout their involvement in the program. It also describes how the programs provide employment- and training-related services and deliver other types of critical support or ancillary services.

#### A. PROGRAM OUTREACH AND RECRUITMENT

Tribal WtW programs must identify potentially interested and eligible individuals and let them know about available services. Effective outreach and recruitment strategies are crucial to WtW programs. If recruitment activities are not carefully tailored to the target group and well executed by project staff, they can be ineffective and costly.

##### 1. Challenges to Recruitment and Enrollment

Because of chronic problems of unemployment and welfare dependency, the study sites generally report having sufficiently large pools of WtW-eligible individuals from which to draw participants. In addition, tribal WtW programs typically are initiated as part of a network of existing tribal human services and housing programs, and this facilitates distribution of information about WtW services and often provides fertile grounds for referrals. Information about availability and effectiveness of WtW services on the reservation is also passed on effectively through word of mouth.

Despite these advantages, most study sites report difficulties attracting participants from the pool of eligible tribal members, qualifying them under the restrictive WtW eligibility criteria, and engaging and retaining them in WtW services. Sites identify several key challenges that make recruitment more difficult than might be true for nontribal WtW programs: limited understanding of welfare requirements among the eligible population, problems accessing services, and difficulty identifying individuals who meet WtW eligibility requirements.

A serious barrier to recruitment on reservations is the eligible population's general lack of knowledge and understanding about welfare reform, work requirements, TANF time limits, and services available to help with the transition from welfare to work. Efforts to improve understanding of WtW services and requirements to leave welfare can

be confounded by language differences; by the location of WtW-eligible households (without transportation or telephone) in outlying, sparsely populated rural areas; and by the dispersal of some tribes' members on and off the reservation.

Lack of transportation, poor roads, and the remote locations of many reservations (which translates into long and costly travel) make it challenging for tribal WtW programs to notify potential participants about the program. Poor travel conditions and lack of public transportation can also make it difficult for tribal members to attend orientation sessions and, once enrolled, to attend program services on a regular basis. Lack of accessible child care on the reservation sometimes prevents individuals from attending orientation and receiving subsequent services.

Recruitment efforts for some tribal WtW programs suffer because of a lack of well-developed linkages and formal procedures for referral of WtW-eligible individuals from local TANF offices. Tribal programs that do not have well-established referral linkages with local TANF offices (a major source of referrals for tribal and nontribal programs alike) usually find that recruitment of WtW-eligible individuals can be very slow. Six of the 10 tribal WtW grantees in the study did not operate TANF programs; consequently, they depend to a substantial extent for referrals on local (non-tribally administered) TANF offices. These tribal WtW program grantees must work with multiple counties and, sometimes, several states (for example, in the case of the Navajo Nation) to obtain referrals and confirm eligibility of potential WtW participants. This problem is especially acute for the California Indian Manpower Consortium, because it must work with and negotiate memoranda of understanding with 29 counties (the welfare system in California is administered by counties).

A significant problem affecting tribal programs that do not operate the TANF program is the difficulty states and counties have in identifying TANF recipients who are tribal members eligible to receive WtW services. While states and counties may record the race/ethnicity of TANF recipients, they seldom record the particular tribe of American Indian participants. If states and counties do not know the tribal affiliation of American Indian recipients, they cannot know for sure whether they are suitable for referral to particular tribal WtW programs. This problem is exacerbated in some areas by frequent misidentification of the race/ethnicity of American Indian recipients as Asian or Hispanic, because such identifications often are based on informal observations and judgments by TANF program staff.

While tribal WtW programs generally draw from large pools of WtW eligibles, several tribes report difficulty identifying and enrolling enough individuals who meet the 70 percent targeting requirement. This, in turn, limits the ability of programs to recruit and serve 30 percent-eligible tribal members. Tribal programs report that problems finding individuals meeting the 70 percent targeting requirement particularly afflicted their programs prior to the passage of the 1999 amendments relaxing the WtW targeting requirements. The most common problem encountered before the passage of the WtW amendments was that a TANF recipient might meet two of the three legislatively mandated targeting requirements under the 70 percent targeting criteria (for example, long-term dependence on welfare, little work experience, substance abuse problems, poor reading skills), yet fail to meet the 70 percent targeting requirement because he or she had

a high school degree or equivalent. Prior to the amendments, such an individual would fall from the 70 percent targeting category to the 30 percent targeting group.

## **2. Outreach and Recruitment Methods Used by Tribal WtW Programs**

Tribal WtW programs generally establish referral arrangements with agencies that serve large numbers of WtW-eligible tribal members on and off the reservation. For the most part, the tribal WtW programs in our sample rely on direct referrals from local TANF offices. Typically, a memorandum of understanding is developed between the tribal WtW program and the local TANF agency, which defines roles and responsibilities of each agency. In particular, the agreement defines how individuals will be identified as WtW eligible by the TANF agency, the mechanics for referral of the individual for services, and the services the tribal WtW program will provide for participants who must meet TANF work requirements.

Despite a clear focus on obtaining direct referrals through local TANF offices, tribal WtW programs also do what they can to inform other agencies and the target population directly about WtW eligibility requirements and the availability of WtW-funded services through their programs. Programs inform WtW-eligible individuals by making staff at TANF and other human service agencies aware of program offerings and placing program literature where potential participants will likely see it. This includes making presentations about the WtW program on the reservation at traditional gatherings such as powwows, on feast days, and at meetings held by other programs on the reservation. Another strategy that sites employ is to visit other agencies that serve tribal members and to brief staff (individually or as a group) about available program services, eligibility, and how to refer eligible individuals to the program. Program brochures often are left with other agency staff to hand out to TANF recipients or be displayed in the agency's office. Another strategy is to place brochures about the program in places that WtW-eligible individuals are likely to frequent, such as the post office, BIA offices, local schools and training institutions, recreational facilities and playgrounds, public housing facilities, probation and parole agencies, and tribal courts. Program staff sometimes make presentations at orientation sessions attended by TANF recipients. Some sites have WtW project staff attend or set up booths at local job fairs and other community events, where they can distribute program literature and talk one-on-one with potential program recruits.

Some tribal sites obtain free public service announcements about their WtW programs on local radio and television stations. As appropriate, announcements are made in the native language such as Navajo or Athabascan. Program administrators and staff also give interviews to local radio and newspaper reporters—this provides an opportunity to inform a wider audience of WtW-eligible individuals (including custodial and noncustodial parents) about available services.

Finally, all sites relied on dissemination of program information by word of mouth, particularly through former participants and community leaders. Because programs mostly target tribal members living on or near the reservation, this is one of the most effective ways of disseminating information about the program and encouraging program participation. Hearing from a friend or relative that a program has provided useful



services (such as helping them find a job) is perhaps the most effective way of stimulating interest in program participation.

## **B. INTAKE AND ASSESSMENT**

Tribal WtW programs, like nontribal programs, use the intake process both to determine the eligibility of applicants to receive WtW-funded services and to assess individual participant needs. Here, we discuss the eligibility determination and assessment processes that are part of the initial package of services new applicants receive.

### **1. Eligibility Determination**

The first step in the intake process involves determining whether a particular tribal member is eligible to receive WtW-funded services and, if so, determining into which targeting category (the 70 or 30 percent target group) to classify the individual. Tribal WtW programs, like nontribal programs, typically rely on state or local TANF offices to obtain information necessary for determining WtW eligibility. If the TANF agency directly refers the individual to the WtW program (as is often the case), the TANF agency will have typically already made a determination of the individual's WtW eligibility. If the individual is recruited directly by the tribal WtW program (for example, a walk-in) or referred by an agency other than TANF, the tribal WtW program must determine WtW eligibility. In such cases, the tribal WtW program staff generally contact the local TANF office serving the particular individual to obtain the documentation necessary to determine WtW eligibility.

### **2. Assessment**

The main purpose of participant assessment is to gain information needed to tailor the wide range of services available under WtW to the specific needs, employment barriers, and goals of each individual. During the intake process—generally beginning on the first day program staff come into contact with the participant—program staff begin to collect background information about the individual through in-person interviews and completion of a printed application form. Though assessment is initiated during intake, tribal programs (like their nontribal counterparts) emphasize ongoing assessment and monitoring of participants (through the case management process) throughout their involvement in the program.

The formality of the assessment process varies across tribal programs. There is no common approach to participant assessment; each grantee develops its own approach—including specific assessment forms, the sequence of steps involved in assessment, and whether standardized tests are used to assess capabilities and needs. Often the assessment process is similar to that used in other tribal programs, such as NEW, JTPA, or TANF. In site visit discussions, WtW program participants said that involvement in the assessment process helps them reevaluate their goals and establish realistic plans for achieving them. Participants also note the important contribution that project staff often made during the

assessment process—helping them carefully think through their goals, assess personal strengths and weaknesses, and structure individual service plans.

An important part of the assessment process centers on the identification of specific barriers to employment that make working difficult or even impossible. Information to assess such barriers is typically collected through one-on-one interviews and, sometimes, through administration of standardized tests (for example, to measure reading/math deficiencies). Common barriers identified through this process include a lack of basic skills (especially reading and math), lack of occupational training and work experience, lack of a driver's license or automobile and other transportation-related problems, and inadequate or unavailable child care. Other common barriers identified through this process are substance abuse problems, mental health problems, and family problems (such as a sick or disabled family member). In addition, program staff note that a lack of self-confidence or self-esteem often is a critical underlying employment barrier. For example, low self-esteem may play a pivotal role in an individual's dropping out of school. Once a person drops out of school, finding a well-paying job becomes far more difficult. After long spells of receiving welfare, applicants come to the program believing that, even if a job is available, they will not be hired or they will be unable to acquire the skills needed (through education and training) to secure a good job.

For standardized testing, tribal programs typically rely on the results of formal reading/math scores provided by the referring agency (usually the TANF local office). If such results are not available or are not up-to-date, several tribal programs use standardized test instruments, such as the Test of Adult Basic Education (TABE) or the Wide-Ranging Abilities Test (WRAT). Other sites rely upon less formal methods for gauging reading/math proficiency, such as client self-assessments and having participants read materials out loud to the intake counselor. Participants at programs that have an emphasis on education and job training (such as Three Affiliated Tribes and White Earth) often have additional basic skills assessments conducted at tribal colleges or other training facilities to which participants are referred.

Most tribal WtW programs in our study sample identify individuals with substance abuse problems based on self-reports by participants (during intake interviews and ongoing discussions with participants), by observation of participants during activities, and by reports of problems by other human service agencies or employers. Such problems often become evident to program staff when an individual fails to show up for program activities or for work.

Two of the 10 tribal WtW programs (Cherokee and Three Affiliated Tribes) conduct drug/alcohol screenings of participants at the time of entry into the program or at later stages. The Cherokee conduct a hair analysis as part of the individual assessment process. Those who test positive for drugs or alcohol are ineligible for services (until they become drug-free) and are referred to the tribal employee assistance program or a substance abuse treatment provider. Although the arrangement was subsequently discontinued, Three Affiliated Tribes initially contracted with Circle of Life, an on-reservation tribal substance abuse center, to provide an initial alcohol and substance abuse evaluation for

all new participants (at a cost of \$50 per individual).<sup>1</sup> This assessment involved an interview with a counselor to determine whether the individual needed substance abuse counseling or treatment (no urine tests were administered). Individuals who needed treatment could enroll at the day treatment program at the Circle of Life (run in five-week cycles) or at inpatient programs in other localities in North Dakota (including Bismarck, Fargo, and Minot).

### **3. Use of Assessment Results in Developing Individualized Service Plans**

In most tribal sites, the results of the assessment process are formally documented in an employment development plan (EDP) or individual service strategy (ISS). This plan outlines specific participant goals and the steps the participant is to take to overcome barriers to securing a job and attaining his or her goals. The process of developing the EDP or ISS is a collaborative one between the participant and a project staff member (usually a case manager). The participant and the project staff member both sign the EDP/ISS, which is a “living” document, to be updated as a participant progresses through the program and as service needs change.

## **C. CASE MANAGEMENT**

The term “case management” refers to how program participants are individually supervised, directed, or counseled by the organizations and service providers while receiving WtW-funded services. A case manager monitors the participant. This typically includes initial assessment of client needs, referral to or coordination of services, ongoing tracking of participant progress, making changes in the EDP, and periodic documentation of employment and other outcomes. The case manager may also be the lead staff member providing direct services (for example, conducting assessment tests, teaching a job readiness workshop, or providing job referrals). Case management may also involve collaboration across organizations; for example, a tribal WtW case manager often will work closely with a TANF family support worker overseeing the same client.

The programs included in our study use two basic approaches to case management: (1) a single case manager, or (2) a team approach. In tribal programs that provide case management services through a single staff person, one staff person guides the participant throughout his or her involvement in the program—including intake and assessment, the provision of job search services, and all follow-up and monitoring activities. This approach has the advantage of providing participants with a single point of contact who is responsible for coordinating service delivery and ensuring that all of the participant’s service needs are fully addressed.

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<sup>1</sup>After about a year of conducting screenings, Three Affiliated Tribes’ 477 program stopped referring individuals to the Circle of Life for alcohol and substance abuse screening. 477 program staff indicated concern that up to three-quarters of those referred never showed up for the screening and that many of those screened were reluctant to take part in the treatment programs. While it was not clearly stated why the screenings were stopped, lack of follow-through by those referred and, perhaps, budgetary constraints appeared to be contributing factors.

Other tribal programs use a team approach, with more than one staff member (usually two, sometimes more) assigned to a participant. Each staff member has specific client-tracking responsibilities and often provides expertise in a specific area. For example, responsibilities are sometimes divided between a staff member who focuses on issues related to employment and training and another who focuses on making sure the participant receives needed support services. This approach has the advantage of enabling project staff members to specialize in an area.

For most tribal WtW programs, as for nontribal programs, case management is a client-centered, goal-oriented process for assessing participants' needs and helping ensure that they obtain the services needed to overcome barriers to employment and long-term self-sufficiency. A trusting relationship between the case manager and participant is critical to an effective case management system. Such a relationship is especially important for long-term welfare recipients, many of whom need assistance in many areas, have few resources, and have little or no formal work experience. Tribal WtW programs report that the relationship afforded through an effective case management system can make a big difference in whether a participant secures and retains employment.

Regardless of how tribal WtW programs manage their caseloads, there is general agreement that successful participant outcomes hinge on each participant having a well-developed EDP and good channels of communication among staff and agencies involved in serving the participant. Tribal sites also indicate that it is important to keep the case manager/client ratios low enough for the case manager to have the time to get to know and maintain regular contact with each client.<sup>2</sup> Case managers also need the flexibility to be able to devote additional time to clients in crisis or where unforeseen circumstances arise. At the sites visited, case managers typically maintain at least weekly or biweekly contact with assigned clients while they are engaged in services and prior to employment. They initiate even more frequent contact during the initial weeks of a participant's involvement in the program and at points of crisis or transition. As the participant moves into and retains employment, case manager contact gradually diminishes (perhaps to biweekly, then monthly, and finally on an as-needed basis).

#### **D. EDUCATION, TRAINING, AND EMPLOYMENT SERVICES**

Services designed to address skill deficiencies and upgrade the long-term employability of program participants are central to the assistance offered by each tribal WtW program. Employment services (such as job readiness training and job placement assistance) are primarily designed to help participants make the transition from welfare to full-time, unsubsidized employment. Under WtW, emphasis is placed on moving participants into jobs as quickly as possible. The following section highlights and compares approaches to employment and training that tribal sites use.

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<sup>2</sup>Six of the WtW programs in the study were small, with 30 or fewer active participants and one or two staff working part-time on WtW and other programs. The multiple responsibilities of such staff make it difficult to interpret case manager/client ratios.

## **1. Job Readiness/Preparation Activities**

As in nontribal WtW programs, tribal WtW programs emphasize job readiness training and helping participants overcome self-doubts about entry into the workforce. All of the grantees in the study provide some type of preemployment job readiness preparation for WtW participants—generally workshops or individualized counseling by project staff. Workshop sessions typically cover self-esteem, assertiveness training, motivation, time management, decision making, and career identification. They also cover resume writing, goal setting, communication/interpersonal skills, meaning and value of work, interviewing techniques, and strategies for retaining jobs and avoiding conflicts with supervisors and coworkers. Project instructors use a variety of teaching techniques in the workshops. These include small-group discussions or exercises, presentations by the instructor or special speakers, role playing, and videos. Participants usually emerge from these workshops with a polished resume and a step-by-step plan for conducting job search activities.

After a participant completes the job readiness workshop, the instructor or the WtW case manager typically works with the participant and the TANF case manager to determine next steps. Based on this decision, the participant's EDP or ISS is updated, including plans for meeting TANF work requirements. Usually, job-ready individuals begin looking for work and individuals who are not yet job ready (lacking job skills or previous job experience) enter a short-term training or work experience activity to enhance employability.

## **2. Basic Education and Postsecondary Education and Training Services**

Despite the philosophy and constraints imposed by WtW, the tribal sites included in this study generally place more emphasis than nontribal WtW programs on providing preemployment education and training, and supported-work opportunities. Even under the amended WtW program rules, stand-alone preemployment training is limited to six months. While the regulations do not impose limits on postemployment E&T activities, coordination with TANF, which does have limits, may impose some TANF-related limits on WtW participants, and low funding levels may limit the duration of such activities. Despite these limits, tribes often go further than nontribal grantees in providing education and training.

This greater emphasis on preemployment education and training is related to several factors: a lack of available job openings on or near reservations, basic-skills deficiencies and lack of job-specific skills that limit immediate job placement potential of many long-term TANF recipients, and preferences among participants and program administrators to take a longer-term approach to preparing individuals so that they can obtain better-paying, career-type jobs. In addition, the existence of 477 programs in several tribal sites (Klamath, Three Affiliated Tribes, White Earth) facilitates increased emphasis on education and training by merging funding across several sources and reducing constraints imposed by the WtW limit on preemployment training to six months.

Three Affiliated Tribes provides a good example of how some tribal WtW programs supplement the basic “work first” approach (an underpinning of WtW) by offering a range of education and training opportunities before and after employment. Under its 477 program, Three Affiliated Tribes combines funding from several sources—including WtW, NEW, WIA, and BIA Adult Vocational Training and Direct Employment—to make a range of educational and training services available to build educational credentials, job-related skills, and long-term employability of WtW participants. The main priority of Three Affiliated Tribes’ 477 program is to enhance educational attainment and prospects for long-term employability of participating tribal members. Most education and training services are provided through courses at the Fort Berthold Community College (FBCC), a tribally controlled community college on the reservation (and at several other satellite locations on the reservation). Individuals who lack a high school degree can attend Adult Basic Education (ABE)/GED courses at FBCC. GED preparation ranges from 12 hours per week to 4 hours per week in other (more remote) locations on the reservation. The tribe requires TANF clients enrolled in fewer than 12 hours of GED per week to supplement their studies with paid work or unpaid work experience assignments. After 477 program participants attain a GED, they can move into postsecondary education, work experience, on-the-job training (OJT) slots, or unsubsidized work. Individuals with high school degrees or GEDs who are enrolled in the 477 program are encouraged to pursue postsecondary education—mostly two- and four-year degree programs or short-term training programs leading to a certificate.<sup>3</sup> Most 477 participants become full-time students, generally taking 12 credit hours per semester. The 477 participants apply for Pell Grants, but if they are ineligible for such grants, the 477 program pays tuition.

While the Three Affiliated Tribes approach is among the most ambitious of the preemployment education and training initiatives funded (in part) by WtW, other tribal programs recognize the need to make basic education and postsecondary education and training available for WtW participants on a pre- and/or postemployment basis. For example, the same agency that operates the WtW program on the Klamath reservation also administers several programs aimed at improving employability. Klamath’s College Assistance program funds tribal member studies at either two- or four-year institutions of higher education in any chosen field. The tribe’s Adult Vocational Training program funds training for tribal members in the service area in any vocation or profession leading to a license or certification. Klamath’s Adult Basic Education program provides tribal members in the service area with short-term, self-improvement funding for classes of interest, including the GED. The Johnson-O’Malley Act program provides supplemental education for any self-identified Native American attending public schools in prekindergarten through the 12th grade.

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<sup>3</sup>Most 477 program participants enroll in two-year programs offered through FBCC. Some of the most popular course offerings at FBCC are computer science, licensed practical nursing, early childhood development, construction trades, elementary or secondary education, and business administration. The 477 participants may also choose to enroll in certificate or degree programs in other localities in and outside of North Dakota. A popular choice is the United Tribes Community College in Bismarck (operated by the four tribes in North Dakota), which offers programs in nursing, policing, plumbing, welding, early childhood development, and other occupational training.

ABE is the main type of educational activity that the tribal programs we visited provide. Heavy use of ABE reflects the relatively high rates of school dropout on Indian reservations. WtW participants typically are referred to ABE programs (usually operated by local education authorities) on the reservation or in nearby towns. Participants usually attend ABE on a part-time basis—perhaps 8 to 12 hours a week—and are involved at the same time in other program activities (such as work experience, job search, or unsubsidized work).

Tribal WtW programs typically look to other funding sources to pay for training (for example, Pell Grants, JTPA/WIA). If other funding sources are unavailable, tribal programs use WtW funding to pay for short-term job training in high-demand occupations (such as clerical/computer skills, nurse’s aide, truck driver).

### **3. Subsidized/Supported Work as a Bridge to Full-Time, Unsubsidized Work**

Tribal programs offer temporary subsidized- and supported-work experience positions, for several reasons: lack of readily available jobs, geographic isolation of some reservations, and lack of work experience and job-specific skills among many of those served. These temporary activities are aimed at acclimatizing WtW participants to the “world of work” (for example, showing up on time, getting along with coworkers, and exhibiting appropriate work attitudes), building job-specific skills and experience, acquiring job references and building resumes, and generally improving their chances of landing a full-time job. Such positions also help some WtW participants to meet requirements under TANF (if they are subject to them) to be involved in work activities at least 30 hours per week. In some instances, grantees use subsidized work—particularly OJT—as a direct avenue for promoting full-time work, by establishing the expectation that employers will hire the worker if he or she successfully completes the trial work period.

The types of work experience slots, their duration, and the subsidy provided to employers vary both across and within programs and across participants. Following are examples of the types of subsidized work tribal programs use:

- ***Klamath.*** The Klamath Tribes use work experience to develop skills needed to seek, maintain, and be successful in unsubsidized jobs. Employment sites are chosen based on the potential for related employment after the work experience period. Emphasis is placed on governmental and nonprofit agencies, which often have openings for clerical, service, and other positions. The job and length of the work experience are tailored to a WtW participant’s needs and capabilities, but duration is limited to 90 days. During the final five weeks of work experience, participants are granted at least eight hours per week to search for unsubsidized employment.
- ***Navajo Nation.*** Work experience is a key component of the Navajo WtW program. WtW funds subsidize 100 percent of the WtW participant’s salary and pay for support services. Participants are placed either in a full-time position (1,000 hours over a six-month period) or in a part-time work experience position (generally providing half as many hours). Participants

placed in full-time positions are typically the most job-ready (they need less work experience before taking a full-time job). Participants who are attending GED classes, and therefore unavailable for full-time work, are typically placed in part-time positions.

Tribal WtW programs such as those operated by the Klamath Tribes and Navajo Nation provide a continuum of employment services, helping participants with widely varying capabilities. Many WtW participants come to programs with less than a high school degree and little or no previous work experience. Therefore, programs offer work experience slots that enable participants to mix work with improving basic skills. Individuals entering such work slots (usually part-time positions with tribal agencies) typically engage in about 20 hours of work per week. They then participate in several other activities aimed at enhancing employability (for example, 8 to 12 hours of GED preparation and several hours of job readiness preparation or job search activity). Participants in such slots are generally paid using WtW, NEW, or TANF funds (or with other employment and training funds if the program is a 477 program) at or near a minimum-wage level.

Tribal WtW programs also use OJT to ease the transition from welfare to unsubsidized work. Such slots typically are used for individuals who are more job ready than those entering work experience slots, but who are still unable to obtain unsubsidized employment on their own or who need additional training to secure longer-term, higher-paying positions. This alternative is available to all tribal WtW programs; the programs included in this study use OJT sparingly, however, because of difficulty in finding employers to sponsor OJTs and a preference for securing unsubsidized rather than subsidized positions whenever possible.

When OJT is used, tribal WtW administrators negotiate slots with local employers to include both productive work and training. Some OJT is arranged through referral to another program, such as WIA/JTPA. The training component of OJT typically begins with an initial orientation to the job. For example, the employer sponsoring the OJT provides a one- or two-week orientation in a classroom setting or a one-on-one meeting with a supervisor, providing guidance on general workplace policies, as well as instruction on how to perform actual work tasks. Employers typically assign a work supervisor or instructor to provide detailed instruction and help with work tasks and to monitor performance and troubleshoot problems as they emerge in the workplace. Workplace instruction is sometimes accompanied by more formal instruction in a classroom setting, either directly by the employer or at a nearby educational institution, to build job-specific skills and productivity.

As under WIA and in other nontribal WtW programs, OJT slots at the tribal WtW sites visited in this study are for up to six months. The tribal WtW programs typically pay 50 percent of the worker's wage. If the individual successfully completes training, the employer is expected to hire him or her as a full-time employee (with full benefits) at the end of the training period. Tribal programs indicate that, in identifying OJT slots, they looked for positions in high-demand occupations, with long-term employment prospects, advancement potential, and an attractive package of fringe benefits (especially health



care). They also look for employers willing to commit supervisory staff to provide hands-on training and mentoring.

#### **4. Postemployment Monitoring and Job Retention Support**

All of the tribal WtW grantees in the study provide postemployment or placement support. They monitor employment status, troubleshoot problems that could lead to job loss or return to welfare, and provide support services (especially transportation assistance) needed to maintain employment. All programs dedicate counselors or case managers to follow up regularly with WtW participants placed in jobs. At a minimum, most programs conduct follow-up telephone calls to employed participants monthly for six months following placement to collect data for reporting on outcomes. Usually, client contacts are more frequent—often daily for the first few days after employment starts, then weekly for the first month or two, then gradually tapering off to semi-monthly and monthly. In some cases—particularly where difficulties arise or troubleshooting is needed—program staff visit participants at their homes or at the workplace. Program staff also periodically contact employers by telephone or in person to check on participants' progress and to address workplace problems/issues (for example, conflicts with coworkers/supervisors, absenteeism, poor performance on the job, attitudinal problems) before they lead to job loss.

Tribal WtW programs urge participants to contact program staff if they run into problems in the workplace, at home, or elsewhere. Participants might need support services (for example, help with car repair, child care assistance, or skill upgrading) to maintain employment. Where possible, tribal programs try to link regular receipt of support services during the six-month period following job placement—such as reimbursement for mileage, distribution of transportation passes, or child care—to regular contacts between WtW program staff and the participant. For example, participants might be required to stop by the WtW program office weekly or semi-monthly to obtain reimbursement or vouchers, at which time program staff can quickly check up on the participant's progress and discuss any emerging problems. Alternatively, WtW program staff might stop by periodically (semi-monthly) at the participant's worksite or home to drop off child care or transportation vouchers and, at the same time, pick up a time card showing work hours and wages.

Beyond ongoing case management and support services, tribal WtW programs make a range of education and training services available to help WtW participants retain and advance in their jobs. While all tribal WtW programs make education and training available to individuals as a postemployment service, tribal sites we visited report that they often have few takers for such assistance. Once placed in jobs (especially full-time jobs), WtW participants find that, unless employers provide paid work time for them to attend education or training (for example, work four days and have a fifth day devoted to classroom instruction), they have little additional time available to devote to upgrading skills, given the need to attend to their children and other household responsibilities.

Tribal WtW programs do not regularly provide help with building basic or job-related skills as a postemployment service. When programs do provide such assistance, it is typically through referrals to other education or workforce development agencies. For

example, once employed, a WtW participant might attend a basic skills/GED preparation workshop several times a week sponsored by the tribe or by a local educational authority (such as a local school district or a tribal or community college) in a nearby city or town. Tribal WtW programs also help participants secure tuition assistance through WIA/JTPA, Pell Grants, and other tribally sponsored educational programs for short-term job-specific skills training and for longer-term education leading to two-year and (in rarer instances) four-year postsecondary education degrees.

## **E. SUPPORTIVE SERVICES**

Sites included in this study commonly make available a variety of supportive services, either directly by WtW programs or through referral arrangement. The tribal grantees offer transportation assistance, referral to child care, referral for substance abuse treatment/counseling, uniforms or other clothing needed to get or keep a job, help obtaining work tools and equipment, and help securing a driver's license and other forms of identification.

### **1. Transportation Assistance**

The tribal WtW programs in our study have found that it is essential to respond to the difficulties tribal members face in getting to and from program activities and employer sites. Among the most common transportation-related barriers are geographic isolation of reservations from major employment sectors (resulting in lengthy and costly travel to worksites), lack of public transportation, poor roads, lack of valid driver's licenses, lack of automobile ownership, and need for help with automobile repairs. Because WtW funds are limited, tribal programs generally try to draw on the resources of other programs (especially TANF funding) before using WtW funds to cover transportation costs. Where other funding is not available, tribal WtW programs provide participants with bus tokens/passes (if such service exists), agency-operated van services, reimbursement for gas mileage, and payments for car repairs or auto insurance. For example, under Three Affiliated Tribes' 477 program, participants who attend and make satisfactory progress in education or work experience activities receive a \$50 transportation stipend every two weeks. This stipend is to help with the purchase of gas (there is no public transportation on the reservation). In addition (though not yet publicized by the tribes and not much used), participants may receive up to \$250 per year to offset costs of car repair.

### **2. Child Care Assistance**

At most tribal sites (except for Cherokee), the lack of readily accessible child care is a major impediment to securing and retaining employment for WtW participants. Many sites do not have enough certified providers to serve the needs of WtW participants and others on the reservation. Obtaining child care can be especially difficult in Indian country because of such factors as the lack of public or other reliable transportation; large distances between the parent's home, the child care provider, and the place of employment; a harsh climate; and cultural factors. For example, reservation casinos

(e.g., Cherokee, Red Lake, White Earth) often operate 24 hours each day, every day of the year, and many provide child care facilities that are open when the casino is open. However, many parents who have a shift that ends late at night or in the morning are reluctant to bring a child to the facility—wanting to avoid awakening the child and transporting the child home at such an hour, especially in the below-zero winter temperatures in an unreliable personal automobile or in a van operated by the casino. Another problem is that some states will not pay for child care provided by close relatives of the child. In contrast to other areas of the United States, it is common in Indian country for relatives to live near each other on tribal lands. In such circumstances, parents generally prefer that a close relative, often a grandparent, provide child care while the parent is working or performing activities required by the WtW, TANF, or other program. Where the state will not pay for such child care, an unintended effect of federally funded child care and development initiatives is to foster disincentives for the provision of child care by close relatives of children served by the TANF, WtW, and CCDF programs.

WtW programs typically look to TANF to pay for child care (including transitional care after the individual becomes employed). Because of the high cost of child care and budgetary constraints, WtW programs generally pay for child care only on an emergency basis or when an individual is just starting child care, until TANF payment can be arranged. Several tribal WtW programs, in conjunction with TANF or other tribal employment and training programs, have developed programs to train tribal members to become certified child care providers, then match these new providers with WtW participants in need of child care.

### **3. Alcohol/Substance Abuse and Mental Health Treatment and Counseling**

In response to widespread problems of alcohol and substance abuse, all tribal WtW programs make counseling and treatment available, but they often struggle to get participants connected with available services. Tribal WtW administrators report that significant numbers of those attempting to make their way off the TANF rolls face problems of addiction themselves or have a family member with debilitating substance abuse problems. These problems are often deep-seated, stretching back over several generations and affecting multiple family members, and pose a significant barrier to employment. Problems with addiction often are long-standing and are not readily acknowledged by participants coming into programs. Administrators report that many individuals with serious substance abuse problems are in denial about the extent of their addiction and resist seeking or accepting help.

As part of the assessment process and ongoing case management, WtW project staff typically ask about past or current problems with substance abuse, as well as mental health and family violence problems. Two of the 10 tribal WtW sites visited (Cherokee and Three Affiliated Tribes) administer a formal drug-screening test.<sup>4</sup> Other sites depend primarily upon participants to offer information on problems with drugs and alcohol, and

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<sup>4</sup>See Section B.2.

on staff to observe the erratic behavior, poor attendance, or loss of jobs that might suggest an addiction problem.<sup>5</sup> In some instances, private-sector employers detect substance abuse problem in drug tests that are part of their hiring process.

Tribal WtW programs generally refer participants with suspected alcohol and substance abuse problems to the tribal alcohol and substance abuse treatment programs for evaluation and, if appropriate, counseling and treatment. WtW programs do not typically have substance abuse counselors on their staff, though case managers are well versed in identifying individuals with suspected problems and knowing what resources are available on and off of the reservation for counseling and treatment. The tribal WtW programs in the study are well connected with residential and outpatient treatment facilities—most programs indicate that, if there is a serious problem and participants want help, they can usually get individuals into treatment within a week or less. Despite availability of a range of treatment alternatives, WtW staff report that it was not unusual to encounter resistance on the part of the participants or other family members to obtaining such help. Even individuals who seek and receive treatment often come back to the same environment or family situation that contributed to their addiction in the first place and find it difficult to avoid relapsing into addiction.

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<sup>5</sup>In many tribal WtW programs, the lack of a standard screening for alcohol and substance abuse is mitigated, to some degree, because people with actual or suspected alcohol and substance abuse problems are generally known as such in the community.

## V

### LESSONS LEARNED AND USEFUL STRATEGIES FOR THE FUTURE

The challenge of ending welfare is perhaps nowhere more daunting in the United States than on Indian reservations and in Alaska Native villages. Long-term dependency on welfare and the lack of economic development on many reservations rival (and sometimes surpass) the conditions in the most depressed inner-city and rural areas of the country. This study of the early implementation experiences of 10 tribal WtW programs identifies critical challenges tribes face in mounting programs to help long-term welfare recipients make the difficult transition from welfare to self-sustaining, full-time work. A major challenge is how to structure programs to address a complex web of related personal problems: low basic skills, lack of educational credentials, lack of occupational skills and work experience, language and cultural differences, transportation-related problems, and substance abuse problems. The individual challenges the target population of WtW eligibles face are further complicated by external factors that have long afflicted Indian reservations. These factors are high unemployment; lack of well-paying, career-type jobs; poor prospects for job creation and sustained economic development; discrimination in local labor markets; geographic isolation; poor roads and transportation; insufficient coordination between tribal and other human services programs; and lack of child care. These conditions often conspire to derail the individual efforts of welfare recipients to break an intergenerational cycle of poverty and dependency.

While the 10 tribal grantees studied in this report were still in the early stages of developing their WtW programs, their experiences identify important challenges and illustrate potentially useful strategies for Indian country. Here, we highlight several important lessons that emerged from this preliminary assessment of tribal WtW programs.

#### A. EXAMINE WAYS TO IMPROVE COORDINATION WITH OTHER PROGRAMS, ESPECIALLY TANF

In designing and implementing tribal WtW programs, tribal agencies must carefully consider how their WtW programs will coordinate with other tribal and nontribal programs to maximize available resources and services. In relation to the size and need of the target population, WtW funding is small and time-limited. Well-established linkages with other programs and agencies—especially TANF—are critical for several reasons.

Linkages with other human service agencies and programs, such as TANF and housing assistance programs, can facilitate recruitment, which can be a difficult challenge to WtW programs. Forging a strong referral linkage with TANF, especially with local TANF offices, is imperative for ensuring a steady flow of referrals to WtW programs.

Special collaborative efforts are needed to improve identification of tribal membership by local TANF offices. In recruiting and serving noncustodial parents, WtW programs need to establish referral arrangements with child support enforcement agencies, courts, the correctional system, homeless shelters, substance abuse treatment programs, and responsible fatherhood initiatives.

Linkages with human service agencies and programs can bring many needed services to which WtW participants can be referred. No single agency is likely to have the resources and expertise to address the full range of issues and problems participants face in making the difficult transition from welfare to work. Links with TANF and other agencies can help to stretch limited WtW funding by enabling participants to secure needed services using funding sources other than WtW. TANF programs in many states have greatly expanded the range and duration of support services for which they will provide payment. It is critical to examine the needs of the target population (for example, substance abuse treatment, child care, transportation, transitional housing), and then line up agencies that can respond effectively and rapidly with support services to meet these needs.

Linkages can help tribal employment and training agencies establish services for their members that outlive the time-limited nature of WtW. While Congress has extended the period over which WtW funding can be spent, WtW remains a time-limited source of funding. Given the poor economic conditions and the extent and intergenerational nature of welfare dependency on many reservations, it is not likely that the problem of transitioning welfare recipients to work will go away soon. Establishing links with other programs can help to ensure that a comprehensive employment and training system is in place in the future.

## **B. STATES CAN BE AN IMPORTANT SOURCE OF SUPPORT AND TECHNICAL ASSISTANCE**

By devolving responsibility for TANF to states, the federal government has changed the relationship between tribes and states. No longer can tribes look solely to the federal government for guidance and protection concerning welfare rules and benefits for tribal members. Now, TANF funds are limited, and tribes that wish to operate their own TANF program must negotiate with states for data needed to plan and administer their program and to determine the allocation of state TANF block grant funds to the tribal program. The five-year limit on receipt of TANF (exempted only on reservations with more than 50 percent not-working rates) reinforces the message that the federal government, with the enactment of PRWORA, in effect redefined its responsibility to tribes. Tribes have no control over state decisions that may affect their members. For example, Idaho did not accept WtW funds, and North Dakota did not accept the second round of WtW funding. In such states, tribal members living off the reservation are denied access to the WtW program, and the state cannot share excess WtW funds with the tribe(s). A tribal TANF program in such circumstances would face still heavier burdens.

Improved cooperation with states has been important in tribal efforts at welfare reform, particularly since the federal government provided neither funding nor technical assistance to specifically address the new responsibilities associated with devolution of

TANF.<sup>1</sup> Cooperation in welfare reform may represent one of the best examples of tribal-state cooperation and can serve as a model for cooperation in other areas. Tribal-state cooperation on welfare reform is often complex, however. One branch of state government may cooperate with a tribe in some areas, and another branch may be uncooperative on the same or different issues. Problems with communication (for example, determining WtW eligibility) and misinterpretation of regulations (for example, with regard to allowable expenditures under WtW) can plague the startup and ongoing operation of WtW programs on and off reservations. Tribal WtW programs should carefully assess ways in which states may be able to help them establish and maintain both TANF and WtW programs.

This study showed that states can make important contributions to the development of tribal TANF programs. For example, Alaska, Arizona, and Oregon have made significant, innovative contributions to the three tribal TANF programs in the study. Each of these states worked closely with the tribes in planning and transferring the TANF program from the state to the tribe/consortium. These states provided training and technical assistance to tribal staff and shared their approaches to TANF data collection, management, and reporting. While some states may not provide full matching funds (the amounts the state would be required to provide were the state providing TANF), the three tribes /consortia in the study that were operating TANF did receive all or some of the state matching funds.

State agencies (particularly welfare and workforce development agencies) may be able to help tribes with TANF and WtW programs in some or all of the following areas:

- Providing training and technical assistance to facilitate planning and transfer of TANF responsibility to tribes—sharing technology, methods, and procedures
- Facilitating the transition of TANF to the tribal program by continuing to provide selected services as the tribe requests
- Providing state matching funds to tribal TANF and WtW programs
- Providing resources to supplement tribal TANF programs
- Stationing state program staff at tribal facilities
- Providing employment and training services (especially through the workforce development system in the state) to supplement those available through tribal WtW and TANF programs

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<sup>1</sup> Pandey et al. (1999)

### **C. COOPERATION WITH STATES CAN STRENGTHEN CHILD SUPPORT ENFORCEMENT AND FATHERHOOD INITIATIVES**

PRWORA and other welfare reform legislation promote child support enforcement, encourage responsible fatherhood, and seek to decrease out-of-wedlock births. In Indian country, with some notable exceptions, progress toward these three goals has been slow, in part because it is commonly believed that noncustodial parents are unemployed or underemployed and unable to contribute child support. Few noncustodial parents were served in the programs visited for this study. WtW programs either did not have, or were just beginning to establish, links with other programs/agencies that serve noncustodial parents (for example, child support agencies, courts, jails/prisons, and substance abuse programs). If WtW programs are to help custodial parents toward self-sufficiency, it is important to enhance the employability of noncustodial parents and connect them where possible with their children. Progress toward these two objectives could promote noncustodial parents' financial and emotional contributions to their children's well-being.

Tribal WtW programs need to assess program models and strategies for serving noncustodial parents and increasing the likelihood that they can make a financial contribution to the upbringing of their children. Research has long shown that one-parent households—without the financial contribution of another adult—have a much more difficult time moving out of poverty and welfare dependency. Tribal programs should look for ways to recruit and serve noncustodial parents. Such programs often need to employ different recruitment strategies and offer a slightly different blend of services than programs targeting custodial parents.<sup>2</sup> Considerable care must be given to how noncustodial parents can be most effectively recruited for such initiatives because recent experience has demonstrated that noncustodial parents (especially those with child support arrearages) are difficult to recruit and, once recruited, are difficult to retain in programs.

One strategy that WtW programs have adopted for recruiting noncustodial parents is to coordinate with child support enforcement programs. Noncustodial parents involved with the child support enforcement program typically need help finding or upgrading employment. The Navajo Nation provides an example of how such a link can be structured. It negotiated cooperative agreements between the tribal child support enforcement program and the states of Arizona and New Mexico to locate noncustodial parents, obtain default and other judgments, and collect child support in accordance with decisions of tribal courts. Under this initiative, Arizona provides funding and technical support for the development of the program and helps the tribe recover child support from noncustodial parents living away from the reservation. The Arizona child support enforcement office determines if the noncustodial parent is employed in the state; if so, the state implements procedures that include contacting the noncustodial parent and, if the custodial parent does not object, garnishing a portion of the noncustodial parent's wages in accordance with the tribal court order. Arizona forwards the child support funds it collected to the tribal child support enforcement program.

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<sup>2</sup>For an overview of the structure of WtW-funded programs serving noncustodial parents, see U.S. Department of Health and Human Services, December 2000.



Another alternative for WtW programs is to establish or coordinate with a local responsible fatherhood initiative. In just the past five years, there has been a groundswell of support at the federal and state levels for the establishment of responsible fatherhood programs to help noncustodial fathers connect (or reconnect) with their children. Such programs provide education, employment, training, and support services to enhance employability similar to those services that WtW programs aimed at custodial parents provide. In recent years, WtW has provided funding to establish and expand these initiatives in many localities across the country. Such programs also often provide services that help noncustodial parents establish paternity, modify child support orders, renegotiate arrearage payments, and improve access and visitation. Many national organizations, as well as agencies within DHHS, can provide information about how to initiate local responsible fatherhood initiatives.

#### **D. FORMING A CONSORTIUM OR ESTABLISHING A 477 PROGRAM CAN HELP TRIBES IMPLEMENT WELFARE REFORM AND WtW PROGRAMS**

Small tribes face unique challenges in implementing welfare reform that can be mitigated if they form a consortium to provide employment, training, and other programs. Two of the WtW grantees in the study—California Indian Manpower Consortium and Tanana Chiefs Conference—are consortia. A consortium enables small tribes to share program staff and operating costs. This is of particular benefit when the funding allocated for an individual tribe would be too little for the tribe to operate a TANF or WtW program on its own. A consortium approach to implementing programs such as WtW presents some challenges, however. Substantial coordination activities are required. Each participating tribe must be well informed about the purpose and goals of the collaboration, involved in the development of the plan of operation, and updated regularly about program status and results. In addition, consortia may have to deal with multiple state or county TANF agencies, which requires time and resources.

Tribes may also want to consider establishing a 477 program, which makes it easier for them to merge funding from WtW, NEW, and other sources for employment and training activities. Three of the sites included in our sample had established such programs. The main advantages of these programs are that (1) a larger integrated pool of funds for employment and training activities is established; (2) regulations governing expenditures can be streamlined, reducing reporting requirements and permitting more flexibility in the use of funds; (3) staff can more easily be deployed across programs and multiple funding sources; (4) the number of funding sources across which expenditures need to be accounted for is reduced; (5) referrals across programs can be eliminated and participant confusion about available programs/services can be reduced; and (6) burden on participants and duplicative delivery of services across programs can be reduced (for example, a single intake form can be used, assessment can be done only once). Similar program integration goals, of course, can be pursued outside of the 477 program, but it provides some additional tools that tribes can use.

## **E. IN INDIAN COUNTRY, IT MAY BE NECESSARY TO SUPPLEMENT “WORK FIRST” WITH EDUCATION, TRAINING, AND SUPPORTED WORK**

The “work first” approach that is the hallmark of most state TANF and WtW programs assumes that, with the right incentives and supports, combined with limited job-readiness or skills preparation, most TANF recipients will find work. Such an approach may be impractical on Indian reservations, where prospects for finding work often are low and there is little new job creation. It does not seem reasonable to expect WtW and TANF programs to transition long-term welfare recipients into jobs, when there are few if any job openings on the reservation or within commuting distance of the reservation. In such a depressed economic environment, the placement of an individual in a job on the reservation may simply mean displacement of another individual. The prospects of finding a job off the reservation—particularly one paying a wage that permits self-sufficiency—may also be very low (or nonexistent). Moreover, moving off the reservation for employment can itself be a wrenching experience.

Within the constraints imposed by WtW, tribal programs need to consider how they can supplement work first approaches with other program services to upgrade basic skills, provide educational credentials (postsecondary certificates and degrees if possible), and a range of subsidized supported work opportunities. Tribes may be able to diversify program offerings under WtW by combining resources under a 477 program or by expanding collaboration with other agencies (particularly local workforce development programs). Tribal programs need to look for ways to build job-related skills, experience, and the resumes of participants to make them more competitive within the job market. This is not a simple task and is likely to take more time and resources than a two- or three-week job readiness workshop, followed by intensive job search, can provide. The experiences of tribal programs visited underscore the importance of providing a comprehensive range of services to address the varied problems tribal members face in transitioning from welfare to employment. At a minimum, either through the sponsoring agency or by coordinating with other local service providers, the following core program components are needed to provide comprehensive WtW services:

- Well-targeted and coordinated outreach and recruitment
- Assessment and employability development planning, culminating in the development of a written individual employment or service plan that identifies participant goals and activities
- Ongoing case management and individual counseling
- Job search, job development, and job placement services, including job search workshops, job clubs, help in identifying job leads, and direct job placement assistance
- Job training services, including (1) remedial education and basic skills/literacy instruction, (2) occupational skills training, (3) OJT, and (4) other types of work experience, such as internships/fellowships

- Postplacement follow-up and support services (such as additional job placement services, training after placement, support groups, and mentoring)
- Other support services provided directly by the project or through referral arrangements with other human services providers. These services include parenting education; alcohol and other substance abuse assessment and counseling, with referral as appropriate to outpatient or inpatient treatment; child care assistance; transportation assistance; referral for mental health assessment, counseling, and treatment; and referral for housing services.

Work experience activities need to be structured so that individuals with very low skill levels and no prior work experience can gradually move along a continuum of work experience activities toward full-time, unsubsidized work. For example, projects will likely need to begin some participants with part-time, unpaid work experience, accompanied by remedial education or short-term occupational training. Gradually, exposure to work can be intensified in hours and work requirements. At the other end of the continuum of subsidized work (before placement into an unsubsidized job), would be OJT. Under OJT, a participant would be placed for up six months with an employer, with the wage being partially paid by the WtW program (up to 50 percent) and the rest covered by the employer. Employers sponsoring OJTs typically would make a firm offer to hire the participant at the end of the training period.

## **F. WtW PROGRAMS CAN HELP EXPAND CHILD CARE AVAILABILITY**

Ability to work and to sustain long-term employment is critically linked to availability of child care. The lack of accessible and affordable child care is one of the most serious barriers on Indian reservations to transitioning long-term welfare recipients from welfare into full-time work. Most of the sites visited as part of this study had a shortage of licensed and high-quality family and group child care facilities that could meet the varied needs of WtW participants. Particular problems are encountered in finding care within reasonable travel time of either the participant's home or work. In addition, finding care for individuals who have variable work schedules or who work evening/night shifts can often be challenging.

Tribal programs need to assess availability of child care for tribal members (including those with special needs) and may need to become actively involved in promoting expansion of supply and in ensuring that referrals for quality care are made in a timely manner. Several WtW grantees included in this study have trained TANF recipients to become licensed child care providers. If WtW programs do sponsor such training initiatives, however, they should be carefully structured. One potential problem associated with training TANF recipients to become qualified child care providers, especially for home-based child care, is that substandard housing of some TANF recipients might require extensive, time-consuming, and expensive renovations to comply with federal, state, or tribal standards. In addition, a home-based child care provider might not be able to generate enough income to achieve long-term self-sufficiency, and there are limited opportunities for advancement within the child care field.

## **G. EXPAND SUCCESSFUL APPROACHES TO THE TRANSPORTATION PROBLEM IN INDIAN COUNTRY**

Lack of reliable transportation to and from work and to and from child care providers is one of the most serious barriers to the employment of TANF recipients in Indian country. Several of the WtW grantees in this study developed approaches that addressed the transportation problems WtW participants face. For example, grantees in our sample developed van service to shuttle workers from home to work, leased or otherwise provided refurbished automobiles to people successfully placed in jobs, and reimbursed participants for travel costs. Tribal WtW programs might also consider the following transportation-related options/strategies:

- If public transportation exists on or near the reservation, purchase and distribute bus vouchers/passes for participants (for example, for up to six months after job placement, to provide an opportunity to keep regular contact with participants after job placement).
- Conduct needs assessments for expanding van/shuttle services on and off the reservation (number of vehicles needed, vehicle maintenance, safety, and warehousing; availability of drivers). If warranted, purchase and operate such van/shuttle services.
- Advertise and otherwise promote the use of tax deductions or credits to individuals and companies that donate serviceable automobiles to tribal TANF/WtW programs.
- Facilitate coordination among tribal TANF, school-based, and other automobile repair programs, and resellers of used automobiles (for example, car rental agencies).
- Acquire and use software that identifies the most efficient routes to serve a dispersed group (in this case, WtW participants) traveling from their residences to or from work or child care facilities.
- Support efforts of the tribe to obtain federal or state funds to improve roads and public transportation on the reservation and to and from the reservation to nearby employment centers.

## **H. WtW PROGRAMS CAN HELP SUPPORT THE ECONOMIC DEVELOPMENT EFFORTS OF TRIBES**

Perhaps the most critical hurdle WtW program operators face is finding well-paying career jobs into which WtW participants can be placed. Unfortunately, WtW administrators can do little directly to stimulate economic development on their reservations. The main goal of their activities should be to provide a full range of high-quality, efficiently delivered WtW services and to prepare participants as well as possible for the jobs that do exist on and off the reservation. To support the economic development efforts of the tribe, WtW administrators and staff can carefully document the available pool of TANF/WtW participants, their existing skill levels, and how such individuals' skills could be upgraded to meet new employers' needs. Such documentation of available labor (in what until very recently has been a time of very low

unemployment in many localities across the country), and having a plan for upgrading skills, could help bring new employers to the reservation or nearby towns. As discussed in the following section, identification of strategies to overcome barriers to business and economic development will be the focus of the next step in the tribal evaluation.

## **I. NEXT STEPS IN THE TRIBAL WtW EVALUATION**

The tribal component of the National Evaluation of the Welfare-to-Work Grants Program will include a second round of data collection that will focus on two critical issues identified but not fully explored in this report: (1) how tribes can overcome management and political challenges to the successful operation of TANF programs, and (2) strategies tribes can use to overcome challenges to business and economic development. The second round of data collection will begin in fall 2001, and the results will be reported in 2002. The two issues to be studied are described below:

1. ***Overcoming Management and Political Challenges to Successful Operation of Tribal TANF Programs.*** The first round of site visits revealed that there is great interest among tribes in operating a TANF program and that this program is seen as critical to welfare reform in Indian country. The second round of data collection will identify problems encountered by tribes in planning, implementing, and operating a TANF program, and will examine ways to prevent or address such problems. Promising approaches developed by tribal TANF programs will be described, and policy or management strategies that facilitate successful tribal TANF programs will be presented.
2. ***Strategies for Overcoming Challenges to Business and Economic Development in Indian Country.*** The first round of site visits revealed that the level of private sector investment and the number of private sector employers operating on or near reservations is very low in comparison to the level of job creation needed to move large numbers of tribal members from welfare to work. This present report describes many barriers (e.g., legal, political, structural, and cultural) to business development; the second round of data collection will examine the extent to which tribes pursue economic development opportunities and the factors that contribute to successful initiatives.

**APPENDIX A**  
**GRANTEE PROFILES**

# **GRANTEE PROFILE:**

## **EASTERN BAND OF CHEROKEE**

### **1. Selected Grantee Information**

Location:	Great Smoky Mountains, North Carolina	
Size of Reservation:	56,688 acres	
Tribal members:	10,000	On/near reservation: 6,311
Size of TANF population:	Unknown	
Special circumstances:	Vibrant reservation economy (gaming)	
Unemployment:	Less than 12 percent	

### **2. Reservation Economy**

The tribe's successful casino operation has encouraged other business development including hotels, restaurants, and a convention center. The casino is the largest employer in Cherokee County, with more than 1,000 employees. The next largest employer is the tribe itself, with more than 500 employees. Tribal employment (mostly in tribal agencies and programs) is expected to grow in the coming years, since the casino revenue allows for a larger tribal budget. There are 11 tribally owned enterprises.

### **3. Organizational Structure**

**Program Structure.** The Cherokee Education and Training Agency (CETA), which includes the WtW grants program, is a full-service employment and training organization with an annual budget of \$1.9 million. The major funding (about \$1.2 million) is for education (higher education, adult education, vocational education, and Bureau of Indian Affairs [BIA] education). CETA also administers tribal JTPA programs (adults and youth, total of \$320,000 annually), NEW (\$90,000), and the Cherokee Health Professionals Recruitment program (\$80,000). Tribal members seeking employment, education, or training assistance can come to CETA for services.

#### ***Program Funding:***

WtW:

FY 1998 \$137,415

FY 1999 \$146,459

**Key Partners.** Both Swain County and Jackson County Department of Social Services maintain staff in Cherokee to administer programs such as food stamps, Medicaid, child protective services, and TANF (called Work First in North Carolina). Southwestern Community College and Western Carolina University both have satellite centers at Cherokee and offer vocational training courses as well as degree programs.

***Program Office Locations.*** The WtW program is operated by CETA, located in the tribal headquarters building.

#### **4. Program Model(s)**

CETA is a one-stop employment and training program. All employment training, job search, and educational programs are operated by CETA. The WtW program (and WIA, formerly the JTPA program) integrates subsidized employment with support services and education or training. CETA takes an individualized approach to serving tribal members.

#### **5. Program Services and Practices**

***Target Population(s).*** The North Carolina Department of Social Services (DSS) can refer clients to CETA, but few individuals who apply for services at CETA come from DSS. Most come in response to a CETA advertisement in the newspaper or flyer or because they know about programs from friends and relatives.

***Enrollment.*** As of October 1999, there were four Cherokee WtW participants.

***Outreach and Referral.*** The main method of outreach is through flyers and newspaper advertisements. The advertisements indicate that CETA can help with child care and provide training and education.

***Innovative Practices and/or Services.*** The tribe has been aggressive and successful in promoting economic development on the reservation. The tribe has operated businesses, formed joint ventures, and attracted private-sector employers to the reservation for many years. Nevertheless, until the opening of Harrah's Casino in 1997, the tribe had more than 50 percent unemployment. Since the opening of the casino, unemployment has decreased to 12 percent, and a 50 percent reduction in the tribal TANF caseload has occurred.

The CETA programs are complemented by the Cherokee Business Development Office and Tribal Business Information Center, which support entrepreneurship and seek to help tribal members become self-sufficient through self-employment.



# **GRANTEE PROFILE:**

## **CALIFORNIA INDIAN MANPOWER CONSORTIUM, INC. (CIMC)**

### **1. Selected Grantee Information**

Location:	Sacramento, California		
Size of Reservation:	156 Member Tribes/83 Participating in WtW		
Tribal members:	95,000	On/near reservation:	34,000
Size of TANF population:	160		
Special circumstances:	Consortium grantee		

### **2. Reservation Economy**

Most of the tribes participating in the CIMC WtW program are located in rural, isolated areas. There are few employers on or near the majority of the reservations. Some tribes have and continue to develop tribal businesses; however, few types of businesses have succeeded. In addition, many tribes have limited resources to plan and develop profitable businesses. For some tribes, gaming has been profitable; however, many tribes have been unable to develop successful gaming operations. Employers near many of the tribal lands include small retail stores, timber-related industries, and the U.S. Forest Service.

### **3. Organizational Structure**

**Consortium Structure.** CIMC was created in 1978 and incorporated under the laws of California as a private, nonprofit corporation; CIMC has been designated a 501(c)(3) nonprofit corporation by the Internal Revenue Service. The membership of the consortium includes federally recognized American Indian tribes, reservations, rancherias, bands, colonies, terminated rancherias, American Indian groups, entities, and organizations (public or private nonprofit) satisfying the requirements set forth in the by-laws of CIMC and in accordance with the consortium agreement formally approved by the membership. A total of 156 member tribes is served by CIMC; 83 of these participate in the WtW program.

The CIMC employment and training program service area includes 41 counties (services are provided only to reservation residents in 4 of these counties), and 98 reservations throughout California. The off-reservation areas in 28 counties receive services through the CIMC Community Services Block Grant (CSBG) program. CIMC administers two DOL/WtW grants on behalf of California tribes participating in the WtW program.

### ***Program Funding:***

WtW:

FY 1998 \$1,159,094

FY 1999 \$1,177,533

***Key Partners.*** Consortium Member Tribes, the Southern California Tribal Chairmen's Association (SCTCA), and 29 counties.

***Program Office Locations.*** In addition to its Chicago-based operations<sup>1</sup>, CIMC's service area is divided into eight geographic areas in California: Redding, Hoopa, Ukiah, Sacramento, Fresno, Escondido, Eastern Sierra, and San Jacinto/San Bernardino. CIMC staffs a field office in each of these regions.

#### **4. Program Model(s)**

CIMC has historically provided employment and training services for its member tribes and their enrolled membership through each of its regional offices. The WtW program was incorporated into CIMC's one-stop approach to service delivery.

#### **5. Program Services and Practices**

***Target Population(s).*** CIMC targets TANF recipients who are enrolled tribal members from among the 83 member tribes that are participating in the WtW program. Referrals come to CIMC through any of the 29 counties within its service area as well as referrals from the tribal TANF program operated by SCTCA. Many of the tribes under the SCTCA TANF program are also member tribes of CIMC.

***Enrollment.*** At the time of the site visit, CIMC had 65 TANF recipients participating in their WtW program. They had received 125 referrals from county TANF offices, 50 through the tribal TANF program operated by SCTCA, 175 self-referrals, and 75 referred by other sources (for example, tribe).

***Outreach and Referral.*** CIMC has been in existence for 21 years and is widely known by tribes and Indian people throughout California. Information about the WtW program has been disseminated widely by CIMC. At the tribal level, each member tribe must pass a resolution to participate in the WtW program; the resolution is published in the tribal newsletter. CIMC staff gives presentations at general and tribal council meetings of all member tribes. There have been some local radio and television public service announcements.

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<sup>1</sup>CIMC provides capacity-building and management oversight under contract for this urban Indian site. CIMC will assist the organization to form its own independent facility. No WtW clients are served from this site.

CIMC also meets regularly with staff from the 29 counties within their service area. They continue to assist counties in identifying Indian people who are eligible for WtW and/or other employment and training programs through CIMC.

***Innovative Practices and/or Services.*** The consortium approach for WtW has been effective for CIMC and its participating WtW member tribes, most of which have less than 1,000 members. Because of their limited numbers, it was not feasible for many of these tribes to apply for a WtW grant. By joining with CIMC in applying for a WtW grant, these small tribes and rancherias were able to access WtW services, with CIMC being responsible for the operation of the WtW program.



# GRANTEE PROFILE: THE KICKAPOO TRIBE IN KANSAS

## 1. Selected Grantee Information

Location:	Northeastern Kansas		
Size of Reservation:	4,879 acres (checkerboard)		
Tribal members:	326	On/near reservation:	478
Size of TANF population:	10		
Special circumstances:	Gaming		

## 2. Reservation Economy

Most jobs on the reservation are with the tribal government, the Kickapoo Nation School, and the casino. When there was a lot of construction in the Horton area, the WtW coordinator received calls from employers looking for construction workers because they needed to recruit women and minorities. The tribe is working with the Haskell Indian Nations University on a long-range economic development plan—each program director has submitted a mission statement and goals for FY 2000.

## 3. Organizational Structure

**Program Structure.** The tribe's human resources department handles employment/job postings from off-reservation employers. The Nation has 19 contracts and 34 grants that fund tribal services. They do not operate a BIA general assistance program. The WtW and NEW programs are administered within the tribe's Community Services program, as are the child welfare, social services, and food assistance programs, as well as a range of other programs. The WtW program has only one coordinator on staff.

### ***Program Funding:***

WtW:

FY 1998 \$41,009

FY 1999 \$38,607

**Key Partners.** The Kickapoo WtW program works closely with the state and local Social and Rehabilitation Services (SRS) offices (SRS is the TANF agency). The Nation has a Memorandum of Agreement (MOA) with the SRS concerning coordination, procedures, and services of the Kickapoo NEW, WtW, and child welfare programs. The MOA has been in place since FY 1994 and is updated annually. The Kickapoo WtW coordinator meets quarterly with local (Hiawatha) and State (Topeka) SRS staff.

The WtW coordinator refers clients to the reservation home health care agency to assist senior citizens in need of care. Certified Nurse's Aide (CNA) courses are offered at nearby nursing homes; such certification is required for home health care jobs. There are a number of training opportunities, both on and off the reservation. The WtW coordinator networks with a variety of organizations to secure training opportunities for NEW and WtW participants.

***Program Office Locations.*** The WtW and NEW programs are administered out of a single office that houses the tribe's Community Services program.

#### **4. Program Model(s)**

The tribe's WtW and NEW programs are small and are staffed by a single person/coordinator, providing in essence, a one-stop approach to meeting the training and job-related needs of each client. When an eligible tribal member comes to the WtW/NEW office seeking assistance in obtaining employment, the coordinator arranges for needed services and activities utilizing the WtW, NEW, or other program resources as appropriate.

#### **5. Program Services and Practices**

***Target Population(s).*** Kickapoo tribal members on TANF or applying for TANF services.

***Enrollment.*** As of June 30, 1999 (nine months after the program started), the WtW program had served 13 people.

***Outreach and Referral.*** Flyers about the WtW program are posted in public places on the reservation, advertised at community events, booths at fairs, and through press releases that appear in the local newspaper and in the casino newspaper.

Applications for TANF are made at the county SRS office (in Hiawatha); applicants who identify themselves as Native American on the application form are given a choice of working with the tribal coordinator or with the local SRS office if they are enrolled Kickapoo tribal members or dependents. In general, SRS prefers that tribal members work with the tribal coordinator because it lessens their caseload, but they are required to give the client the choice.

***Innovative Practices and/or Services.*** The tribe has been aggressive and successful in promoting economic development on the reservation, and the reservation economy has been invigorated by the success of the tribe's casino. Since the opening of the casino, any of the 500 tribal members residing on or near the reservation who want a job can get one. The focus has been on enterprises owned and operated by the tribe, as opposed to attracting other employers to the reservation.

The tribe is implementing programs and policies designed to overcome employment barriers. These programs include:

- A cash incentive and community recognition are offered to each member obtaining a high school degree or the equivalent, and postsecondary education scholarships and programs are offered and advertised.
- The tribe operates an alcohol/substance abuse treatment program and collaborates with providers of specialized treatment services.
- Assistance is provided to tribal members to become homeowners on the reservation.
- The tribe has adopted an “education first” approach to employment.





# GRANTEE PROFILE: THE KLAMATH TRIBES

## 1. Selected Grantee Information

Location:	South-central Oregon
Size of Reservation:	372 acres
Tribal members:	3,243                      On/near reservation: 3,748
Size of TANF population:	28
Special circumstances:	Operates tribal TANF program

## 2. Reservation Economy

The tribes confront significant barriers to employment and economic development. One such barrier is the lack of tribal or reservation land resulting from termination of federal recognition and treaties. There are, however, several factors that bode well for the development of the Klamath economy and employment opportunities for tribal members. For example, revenues from the tribal casino are likely to benefit from growth in tourism and in population in the region. Positive relations with the state government have facilitated cooperative planning and development efforts. The tribes are also in negotiations with the U.S. Forest Service for the return of land taken during termination.

## 3. Organizational Structure

**Program Structure.** The Klamath Education and Employment Department's (KEED) administers the tribes' WtW program. The WtW program is designed to provide tribal TANF program participants with work experience, including community service employment. The main objective of the WtW program is to place TANF participants in unsubsidized jobs. The program is specifically targeted at welfare recipients facing the most significant barriers to securing and retaining employment (for example, lack of education and training, work experience, child care, and transportation; poor reading and writing skills; long-term dependence on welfare; low levels of confidence; and low aspirations for productive employment). The WtW program receives all of its clients through referrals from the tribes' TANF program—Native American Family Assistance (NAFA).

In addition to the WtW program, KEED administers five other programs: (1) College Assistance, (2) Adult Vocational Training, (3) Adult Basic Education, (4) the Johnson-O'Malley Act/Program, and (5) Direct Employment Assistance.

### ***Program Funding:***

WtW:

FY 1998 \$48,948

FY 1999 \$43,953

***Key Partners.*** The Klamath Tribes' Native American Family Assistance (NAFA) program was the first tribal TANF program to begin operations. The tribe worked closely with the state and patterned its NAFA plan after the state's own. KEED works with Klamath County to identify potential jobs. NAFA refers clients to the tribal WtW program. The Oregon Department of Human Resources provides employment and training slots that are funded by the state. These slots are currently used in partnership with Goodwill Industries.

***Program Office Locations.*** KEED's offices are located at the tribal headquarters in Chiloquin. The majority of intake for WtW clients referred by NAFA is done there. Caseworkers also meet TANF clients at the NAFA offices, which are located approximately 24 miles to the south of the tribal headquarters building. The caseworkers also go to a client's home as needed.

#### **4. Program Model(s)**

The tribe's WtW program is closely patterned after the state's. Once the state refers Klamath tribal members to NAFA, the flow of clients is identical to most state programs. NAFA performs intake-related services and refers eligible clients to the WtW office.

#### **5. Program Services and Practices**

***Target Population(s).*** The tribes' WtW program is specifically targeted at enrolled tribal members who receive tribal TANF.

***Enrollment.*** As of September 30, 2000, the WtW program had served 36 people.

***Outreach and Referral.*** The NAFA office makes referrals. No other outreach or recruitment is done for the WtW program.

***Innovative Practices and/or Services.*** The tribes' affiliation with Goodwill Industries has been a success. Using a case management approach, the Goodwill program facilitates the identification of barriers to employment and improvement of problem behaviors (such as lateness). Trainees who are tardy or engage in other problem behaviors are advised that, if they were actually employed, they would have been terminated. Both Goodwill and the tribes work together to identify and address the barriers that are uncovered during the client's work experience.

# GRANTEE PROFILE: THE NAVAJO NATION

## 1. Selected Grantee Information

Location:	The Navajo Nation includes portions of the states of Arizona, New Mexico, and Utah. In addition, there are three quasi-autonomous satellite reservations in New Mexico—Ramah, Alamo, and Canoncito.	
Size of Reservation:	16,244,896 acres	
Tribal members:	234,786	On/near reservation: 174,000
Size of TANF population:	27,000	
Special circumstances:	Tribal TANF as of October 1, 2000	

## 2. Reservation Economy

The Navajo Nation includes world-renowned scenic areas, such as Canyon de Chelly, Shiprock Peak, and Monument Valley. It is estimated that 5 million tourists visit areas on or near Navajoland each year. The reservation has significant amounts of natural resources including timber (523,000 acres of ponderosa pine and Douglas fir), coal (4 billion tons), uranium (40 million tons), oil (millions of barrels), and land suitable for agribusiness.

There is a high rate of unemployment (over 58 percent) on the Navajo Reservation. According to the Nation's 1998-99 Overall Economic Development Plan, there were 824 employers in the Navajo Nation. Of these employers, only 52 had 100 employees or more. Basic industries such as manufacturing were represented by eight firms, with only four of these being major firms (Packard Hughes Interconnect, Raytheon Missiles, Tooh Dineh Industries, and Bula, Inc.). Another sector of basic industries, agriculture, has but one major firm—Navajo Agricultural Products Industry (NAPI).

The service sector (including hospitals, hotels and motels, and schools) is the largest employer in the Navajo Nation, with 279 (34 percent) of the 824 employers on the reservation. While tourism represents an area of potential growth, there are only 13 hotels and motels on the Reservation, and they represent only a small fraction of the economy of the Navajo Nation. The federal, state, and Navajo Nation governments are among the largest employers, with over 18,000 employees.

## 3. Organizational Structure

**Program Structure.** The Navajo Division of Workforce Development (NDWD) performs managerial, fiscal, technical, and administrative tasks involved in carrying out the various program activities for the following programs:

- An employment and training program funded under Title IV-A and II-B of JTPA. This program is supplemented by JTPA funds from the states of Arizona and New Mexico.
- An emergency services program funded under the Community Service Block Grant (CSBG) program.
- A senior nutrition information and assistance program funded under Title VI of the Older Americans Act (OAA).
- Native Employment Works (NEW), and the prior Job Opportunities and Basic Skills (JOBS) program.
- Supplemental Security Income (SSI) (Title II, PL 104-193)
- Child Support Enforcement (CSE) (Title III, PL 104-193)
- Child Care and Development Fund (Title IV, PL 104-193)
- Child Nutrition (Title VII, PL 104-193)
- General Assistance (GA)
- Housing Assistance (includes Home Improvement Program [HIP] and Weatherization Assistance Program [WAP])
- Head Start
- Foster Grandparent Program (FGP)
- Federal and State WtW Grants

The WtW program is closely coordinated with four other NDWD programs: (1) NEW, (2) JTPA, (3) Child Care Development Fund (CCDF), and (4) Child Support Enforcement.

***Program Funding:***

WtW:

FY 1998 \$2,294,364

FY 1999 \$2,530,161

***Key Partners.*** The WtW program works closely with the Arizona, New Mexico and, to a lesser degree, the Utah TANF programs. Memoranda of Agreement (MOAs) have been implemented with Navajo departments/programs (for example, Behavioral Health, TANF) and with state agencies in Arizona, New Mexico, and Utah.

***Program Office Locations.*** The NDWD has local offices at each of the five agencies in the Navajo Nation (Chinle, Crownpoint, Fort Defiance, Shiprock, and Tuba City). In addition, suboffices are maintained at Pueblo Pintado, NM; Greasewood, AZ; Tohatchi, NM; Rock Point, AZ; Aneth, UT; Kayenta, AZ; Leupp, AZ; Page, AZ; and Phoenix, AZ.

#### **4. Program Model(s)**

The WtW program service area is comprised of the entire Navajo Nation and the counties contiguous with its boundaries. The scope of the WtW and other Navajo Nation programs is vast, and program practices and issues vary across the five agencies to meet the needs of the chapters and individuals served. For example, each agency develops a work experience component in accordance with the needs and operations of tribal programs within the agency. Contract analysts at each agency negotiate contracts with service providers, such as Dine College, Crownpoint Institute of Technology, and the Gallup campus of the University of New Mexico (for remedial, basic, and vocational education services).

With the implementation of tribal TANF, the tribe has planned for close coordination in operating the TANF, WtW and other NDWD programs using a “one-stop” approach to serving clients.

#### **5. Program Services and Practices**

**Target Population(s).** The program works closely with the TANF programs in Arizona, New Mexico, and Utah to identify TANF recipients who reside in the Navajo Nation service area. The NDWD has posted announcements about the WtW program throughout the reservation at public places like Chapter Houses, post offices, and agency offices.

**Enrollment.** For the period ending March 31, 2000, a total of 173 people had been served under the WtW grant.

**Outreach and Referral.** The tribe receives and recruits TANF recipients referred by the states. The NDWD also has posted announcements about the WtW program throughout the reservation at public places like Chapter Houses, post offices, and agency offices.

**Innovative Practices and/or Services.** The Navajo Nation has historically placed economic development high on its list of priorities. It is developing and utilizing its natural resources (for example, coal, timber, rangeland) and has promoted a variety of initiatives, including a sawmill, timber harvest, uranium mining, and electrical power generation. The development efforts, however, have not generated enough jobs to reduce unemployment below 50 percent.

The tribe has developed broad community support for child support enforcement (CSE) and the tribal council has enacted a CSE Act. The tribe has worked closely with the States of Arizona and New Mexico, and the Navajo CSE Program has been able to generate more than \$600,000 per year in child support.

On October 1, 2000, the Navajo Nation launched the largest tribal TANF program. The tribe’s TANF proposal estimates that more than 27,000 Navajos will be served with more than 14,000 residing in Arizona, more than 12,000 residing in New Mexico, and more than 700 residing in Utah—all within Navajo lands.



# GRANTEE PROFILE: THE NEZ PERCE TRIBE

## 1. Selected Grantee Information

Location:	Western Idaho		
Size of Reservation:	750,000 Acres		
Tribal members:	3,300	On/near reservation:	16,159
Size of TANF population:	109		
Special circumstances:	The tribe operates TANF program; WtW program integrated in 102-477 program.		

## 2. Reservation Economy

While the Nez Perce tribe has had some success in job creation, the unemployment rate is estimated to exceed 60 percent. The majority of employed tribal members work for the tribe, tribal entities, federal agencies, or the tribally owned and operated casinos. The tribe is the major employer on the reservation, with more than 900 employees, including seasonal workers. The tribe operates two casinos, an automobile service station, and convenience stores. The tribally owned Nee Mee Poo Health and the tribal Housing Authority together employ almost 100 employees.

While there are employers located near the reservation, few tribal members are employed by nontribal enterprises. The largest non-Indian employer near the reservation is the Potlatch Corporation, with 2,400 employees. Other major non-Indian employers in the area include the Blount Company, St. Joseph Medical Center, Lewiston Independent School District, Lewis-Clark State College, and various timber companies.

## 3. Organizational Structure

**Program Structure.** The WtW program is integrated in the tribe's Public Law 102-477 (Indian Employment, Training and Related Services Demonstration Project) program. The Nez Perce 477 program began to serve clients on January 1, 2000. Services are provided to tribal members residing on or near the reservation. The 477 program service area includes five counties in North Central Idaho and two cities in neighboring Washington State (Clarkston and Asotin).

The 477 program is administered by the Nez Perce Tribal Employment Rights Office (TERO) within the tribe's Department of Education. TERO is responsible for the delivery of employment, training, and education services to tribal members, ages 16 and older, residing on or near the Reservation. In addition to the 477 program, TERO administers:

- A vocational rehabilitation program, funded by the Department of Education (ED)
- A vocational education program, funded by ED

- Administration of Indian preference in employment, training, contracting, and subcontracting under tribal ordinance, partially funded by the Equal Employment Opportunity Commission (EEOC).

**Program Funding:**

The 477 program blends funding from three federal sources:

Department of Health and Human Services (DHHS), Native Employment Works (NEW)	\$51,000
Department of Labor (DOL), Job Training Partnership Act (JTPA) Title IV-A:	\$36,000
II-B:	\$107,000
Workforce Investment Act (WIA) Section 166	\$23,000
Welfare to Work (WtW)	\$23,000
Bureau of Indian Affairs (BIA) Adult Education and Employment Assistance	\$143,000

TERO has an operational budget of 1.3 million dollars; nine percent of the total operating budget is allocated using tribal dollars, with the balance being federal share. The total 477 program budget is \$360,000.

**Key Partners.** The 477 program has developed a network of agreements, formal and informal, with other programs operated by TERO, with other tribal programs, and with nontribal programs, primarily employment and training programs operated by the state of Idaho. In general, these agreements afford access by 477 program participants to employment-related supportive activities and services and identify ways the services can be coordinated by the parties.

The 477 program works closely with the vocational education, vocational rehabilitation, and Indian preference programs also operated by TERO. The 477 program also works closely with other tribal programs and offices, including the TANF, Early Childhood Development, General Assistance, and Tribal Scholarship programs, and the Welfare Reform Task Force and Tribal Housing Authority.

The Nez Perce 477 program coordinates services and activities with nontribal programs primarily through a partnership with Lewis-Clark State College (LCSC) that involves some formal and some informal agreements with a range of programs, including:

- **Idaho State Programs:** (1) JTPA Title II A/B/C and Title III; (2) Idaho Department of Labor, Employment Service Plan targeting Native American unemployment insurance claimants under JTPA Title III, authorized by the Private Industry Council (PIC); (3) North Central Idaho Regional Collaborative Team for One-Stop Career Centers; (4) Idaho Department of Vocational Rehabilitation; (5) Idaho School-to-Work (Informal Agreement); (6) Idaho Rural Partnerships; (7) PIC of North-Central Idaho; and (8) Idaho Department of Health and Welfare, TANF.



- **Other Non-Tribal Programs:** (1) U.S. Forest Service for youth work camps, (2) Boys and Girls Clubs, (3) Idaho Rural Partnerships (The tribe has a representative on the statewide board), and (4) Northwest Federation of Community Organizations (NWFCC).

The state of Idaho has supported the tribe's operation of the TANF program and its efforts to help tribal members become self-sufficient and to end their dependence on welfare. The state gives tribal members a choice of receiving TANF through the state or through the Nez Perce program. The state uses surplus TANF funds to provide supportive and other services to tribal members, including funds for work-related child care, transportation, training, and work supplies and equipment.

**Program Office Locations.** The 477 program offices are housed in two TERO Tribal Resource Centers (TRCs) located on the reservation in the towns of Lapwai and Kamiah.

#### 4. Program Model(s)

The Nez Perce 477 program includes WtW, NEW, JTPA, adult education, and employment assistance programs. The 477 program is offered in two one-stop TRCs. The tribal vocational education and rehabilitation programs are co-located with the 477 program. These tribal programs embrace values of self-determination, self-governance, and the improvement of the tribe. Nez Perce culture, tradition, and values are expressed throughout the programs. Among the Nez Perce values expressed in the programs are self-reliance and independence.

#### 5. Program Services and Practices

**Target Population(s).** The Nez Perce 477 program targets TANF recipients—tribal TANF staff refer all recipients to the 477 program.

**Enrollment.** The WtW program operated for about six months before being incorporated into the 477 program. During that time, the WtW program served 25 TANF recipients. From July 1, 1999, to December 31, 1999, the 477 program served 25 participants.

**Outreach and Referral.** The 477 program is widely known throughout the reservation; most of the participants were self-referred or were referred by tribal TANF program staff.

**Innovative Practices and/or Services.** Many of the 477 program participants have multiple barriers to employment. The employment barriers on the reservation include a lack of transportation and child care, low educational attainment of many tribal members, and prevalence of alcohol/substance abuse (A/SA). The tribe is implementing programs and policies designed to overcome each barrier and address long-term dependence on welfare programs:

- **Transportation.** The tribe operates two vans to transport employees to and from work at the casinos and convenience stores, and the 477 program helps TANF recipients access state-funds to reimburse work-related transportation costs.

- ***Child Care.*** The 477 program provides funds to TANF recipients for child care when such funds are unavailable from the TANF program. Lack of child care is a problem primarily because there are too few providers on the reservation. The LCSC offers an Associate of Arts program in early childhood development, and the tribe has arranged for classes in this program to be conducted on the reservation.
- ***A/SA.*** The tribe has implemented A/SA prevention and treatment programs and collaborates with providers of specialized treatment services (for example, residential treatment) when needed.
- ***Educational Attainment.*** The tribe's focus on increasing the educational attainment and employability of its members is central to the Nez Perce 477 and related programs. Clients of the 477 program are given the option to attend local or tribal colleges off the reservation.

# GRANTEE PROFILE: THE RED LAKE BAND OF CHIPPEWA

## 1. Selected Grantee Information

Location:	Northern Minnesota	
Size of Reservation:	837,736 acres (closed reservation)	
Tribal members:	9,264	On/near reservation: 7,974
Size of TANF population:	650	
Special circumstances:	Gaming	
Unemployment:	Exceeds 50 percent	

## 2. Reservation Economy

The tribe is developing a 20-year economic development plan. As part of this process, the tribe has identified four business sectors with greatest growth potential over the next 20 years: (1) wood products and building materials, (2) tourism/hospitality, (3) recreation, and (4) value-added agriculture. Based on this analysis, a plan for a hotel and water park is under consideration. The tribe is the largest employer on the reservation and is one of the larger employers in Beltrami County.

Economic development efforts include (1) a modular home construction facility; (2) a water bottling plant; (3) a construction firm; and (4) three casinos—River Road Casino (slots, blackjack, and bingo), Red Lake Casino (slots and bingo), and Lake of the Woods Casino (300 slot machines and blackjack). Despite these efforts, unemployment remains high (67 percent reported in 1997 by BIA) because there are too few jobs available.

## 3. Organizational Structure

**Program Structure.** The Employment and Training Department is responsible for the array of federal, state, and tribally funded employment programs, including: JTPA, TERO, CCDF, WtW, NEW, IMAGES (State MFIP/E&T-funded program similar to NEW), and General Assistance.

### **Program Funding:**

WtW:

FY 1998 \$195,976

FY 1999 \$267,288

**Key Partners.** Partners include (1) Beltrami County Human Services (the local TANF agency); and (2) the Rural Minnesota Concentrated Employment Program, Inc. (JTPA/WtW formula grant provider as well as MFIP/E&T provider for nontribal members in the area).

***Program Office Locations.*** The WtW program is currently located across the street from the local TANF agency (Beltrami County Human Services Branch Office at Red Lake). The program houses three NEW/IMAGES case managers and one case manager dedicated to WtW.

#### **4. Program Model(s)**

The Red Lake WtW program is administered by the Education and Training Department, IMAGES, which administers the NEW, JTPA and TERO programs. The tribe's Public Law 102-477 program, which will integrate its education and training programs, has been approved by BIA and was scheduled to begin in January 2000. These programs will be accessed in a one-stop center that was under construction at the time of the site visit.

#### **5. Program Services and Practices**

***Target Population(s).*** MFIP clients who are enrolled tribal members and are referred by the local MFIP/TANF office.

***Enrollment.*** As of September 1999, the WtW program had served 77 participants, with 4 of the 77 (5 percent) obtaining unsubsidized employment.

***Outreach and Referral.*** There are few efforts to actively recruit participants for the WtW program. Almost all clients are referred from the local MFIP office.

***Innovative Practices and/or Services.*** A tribal bus system is being implemented to help members get to and from work. The WtW program also provides funds to TANF recipients for child care when such funds are unavailable from the MFIP program. The tribe's planned implementation of a 477 program is intended to further integrate its JTPA, CCDF, NEW, WtW, Vocational Education, Higher Education, and General Assistance programs.

# **GRANTEE PROFILE: THREE AFFILIATED TRIBES (TAT)**

## **1. Selected Grantee Information**

Location:	Northern Plains-West Central North Dakota		
Size of Reservation:	1,000,000 acres		
Tribal members:	10,500	On/near reservation:	5,246
Size of TANF population:	114		
Special circumstances:	WtW program integrated in 102-477 program 45 percent unemployment		

## **2. Reservation Economy**

The 1997 BIA *Labor Force Report* (the most recent BIA data available) indicated the actual number of tribal members employed was 1,023, of which 387 (38 percent) were living below poverty guidelines. The percentage of tribal members not employed exceeded 61 percent. Tribal officials reported that, in 1999, the unemployment rate was 45 percent. There are not enough jobs available to allow TANF recipients to move from welfare to work. The few jobs that become available tend to be service-related; often these jobs are seasonal, such as farm or ranch work; or tourism-related (motel/hotel housekeeping and maintenance, restaurant servers). The closest city, Minot, is about a two-hour drive from the Fort Berthold reservation—a commute that is impractical on a daily basis for most tribal members because of a lack of reliable transportation.

The largest employers on the reservation are the tribe itself (347 employees), the tribally owned Four Bears Casino and Lodge (300 employees), and the Northrop Grumman Corporation (25 employees). While several tribal enterprises have failed in recent years, new tribal enterprises are being planned, including a casket-making facility in New Town and a modular homes facility in Twin Buttes. There are few other enterprises on the reservation, and the pace of job creation is not sufficient to provide employment to large numbers of TANF recipients.

## **3. Organizational Structure**

**Program Structure.** The TAT Employment and Training Department administers the WtW activities as part of a PL 102-477 program. The 477 program has a one-stop approach, where a case manager coordinates the services and activities for each participant. The TAT 477 program includes WtW, JTPA, adult education, and employment assistance programs, which are offered in a single office on the reservation.

The 477 program recruits people eligible for WtW services by soliciting referrals from the county TANF offices that serve the Fort Berthold Reservation. The reservation extends across five counties—Dunn, Mercer, McLean, McKenzie, and Mountrail. Each of these five county TANF offices refer TANF recipients to the TAT 477 program.

**Program Funding:**

The 477 program blends funding from the following federal programs:

FY 1998: federal WtW grant	\$ 51,214
FY 1998: WtW competitive grant	\$276,000 (not used) <sup>2</sup>
Other 477 program funds (not specified) (including WtW)	\$598,786

**Key Partners.** There are three major partners with the TAT 477 program—Fort Berthold Community College (FBCC), the five county TANF offices, and the North Dakota WtW program (known as JOBS). The JOBS program began to enroll participants in December 1998. Few TAT members were enrolled in the JOBS program, in part, because of problems in identifying people who met the 70 percent targeting requirement (lack of a high school diploma or equivalent and difficulties in reading, math, or other work-related skills).

The state of North Dakota did not accept a second year of WtW funding because the state had sufficient funds remaining from its first year allocation of formula funds (\$2.6 million) and felt that it had sufficient funds to serve its TANF population. Consequently, the WtW formula program services provided through JOBS, and available to tribal members off the reservation, will terminate in August 2001.

FBCC, located on the reservation in New Town (and at several other satellite locations on the reservation), works closely with the TAT 477 program. Many 477 participants enroll in FBCC certificate or degree programs or in other postsecondary schools in and outside of North Dakota. A popular choice is the United Tribes Community College in Bismarck (operated by the four tribes in North Dakota), which offers programs in nursing, policing, plumbing, welding, early childhood development, and other occupational training. Most 477 participants become full-time students, generally taking 12 credit hours per semester. The 477 participants may apply for Pell Grants, but if they are ineligible for such grants, tuition is paid by the 477 program.

**4. Program Model(s)**

Because many tribal members lack the education or skills needed to obtain and retain unsubsidized jobs and because few unsubsidized jobs are available on or near the reservation, the 477 program has developed an "education first" approach. A broad range of educational opportunities is supported including obtaining a General Education Development (GED) diploma, 2- and 4-year degree programs, and certificate programs both on and off the reservation. Work experience is provided for TANF recipients as well as support services including transportation, alcohol/substance abuse (A/SA) screening/treatment, child care, and funds for work, clothing, and equipment.

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<sup>2</sup>Because of a lack of consensus concerning administration of the competitive grant, the tribe did not expend all of the obligated funds.

## 5. Program Services and Practices

Many tribal members lack the education or skills needed to obtain and retain unsubsidized jobs. To address this issue, the 477 program has an “education first” approach. A broad range of educational opportunities is supported, including obtaining a GED, two- and four-year degree programs, and certificate programs both on and off the reservation. Work experience is provided for TANF recipients, as well as support services, including transportation, alcohol/substance abuse (A/SA) screening/treatment, child care, and funds for work clothing and equipment.

**Target Population(s).** The TAT 477 program targets TANF recipients and solicits referrals from the five county TANF offices. Tribal members who are eligible for TANF are referred to either the TAT 477 program or the North Dakota Job Service’s JOBS program. Per agreements with the tribe, the TANF offices generally refer recipients who are interested in obtaining education and training to the 477 program; others are referred to the state JOBS program. The majority of the 477 program participants are not TANF recipients. The 477 program existed prior to the WtW program and is widely known throughout the reservation; the majority of the participants were self-referred.

**Enrollment.** Because the TAT WtW services and activities are integrated into the 477 program, there are no separate data for WtW program participants. The 477 program receives about five referrals per month of WtW-eligible individuals from county TANF offices. Program statistics for the period October 1, 1998 through September 30, 1999 show that 885 people were served under the 477 program; 205 individuals were actively enrolled in the program as of September 30, 1999.

**Outreach and Referral.** The 477 program is widely known throughout the reservation. Announcements and information about the program are distributed in several tribal offices and are distributed at public gatherings such as powwows and rodeos. The program also recruits persons eligible for WtW services by soliciting referrals from the county TANF offices that serve the Ft. Berthold Reservation.

**Innovative Practices and/or Services.** As with other tribal WtW grantees, most of the 477 program participants have multiple barriers to employment. The employment barriers on the reservation include a lack of transportation and childcare, low educational attainment of many tribal members, and prevalence of alcohol/substance abuse (A/SA). The TAT 477 program focus on post-secondary education and training is quite different from the work-first approach generally employed in most WtW programs.

TAT places particular emphasis on education for career enhancement. TAT 477 clients have the choice of attending FBCC or other two- and four-year educational institutions off the reservation. FBCC provides a large share of the postsecondary training for 477 clients, with about 75 percent of these individuals having their tuition and other school cost paid through the 477 program (along with Pell grants). FBCC enrolled 285 students in spring 1999; 92 percent of these students were Native Americans. Most of those attending FBCC were enrolled in two-year degree programs (FBCC does have one four-year degree program).





# **GRANTEE PROFILE:**

## **TANANA CHIEFS CONFERENCE, INC. (TCC)**

### **1. Selected Grantee Information**

Location:	Alaskan interior	
Size of Reservation:	138,240 acres (consortium of 43 Athabaskan Indian Villages covering 235,000 square miles)	
Tribal members:	11,086 (service population)	On/near reservation: 5,500
Size of TANF population:	174	
Special circumstances:	Subsistence-based economies Few paying jobs in villages	

### **2. Reservation Economy**

The economies of most of the TCC villages are subsistence based, including hunting (moose, caribou, porcupine, rabbit, and ptarmigan), freshwater fishing, and harvesting of berries. Other economic characteristics include (1) few paying jobs in the villages; (2) families are dependent on seasonal subsistence activities; and (3) many villagers migrate to and from Fairbanks to work, shop, attend education and training programs, and/or to seek medical, social, legal, or other services. Given these facts, the unemployment rate in most TCC villages varies from 80 to 90 percent using conventional measures.

Most of the villages are accessible only by boat (via rivers), snowmobile, or airplane. Few villages have landing strips that can be used after sundown for lack of landing lights. While every village has a school, none has a hospital or clinic staffed with physicians. Seriously ill or injured residents have to be transported by bush plane to Fairbanks or another city to receive medical care.

### **3. Organizational Structure**

**Governance.** TCC is governed by a Board of Directors; each of the member villages elects a member of the board. The board elects a nine-member executive board, a president/chairman (responsible for the management of the corporation), a vice president, and a secretary/treasurer.

TCC is organized into six divisions: Health Services, Community and Natural Resources, Finance and Administration, General Counsel, Executive Secretary/Support Services, and Planning and Development. The Employment and Training Department is part of the Community and Natural Resources Division. The Employment and Training Department administers programs funded, in part, from grants and contracts under NEW, JTPA, Youth Summer Employment, and the WtW programs.

### ***Program Funding:***

WtW:

FY 1998 \$192,346

FY 1999 \$183,074

***Key Partners.*** The WtW program is closely coordinated with other TCC programs, including NEW, JOBS, and Athabaskan Self-Sufficiency Assistance Program (ASAP). Although TCC has taken over responsibility for TANF, the state continues to administer the food stamp and Medicaid programs.

The Alaska Division of Public Assistance (DPA) has out-stationed food stamp/Medicaid eligibility staff at TCC, and the TCC and DPA staff work side-by-side in a single office. This arrangement allows DPA and TCC staff to exchange information about clients receiving assistance from both agencies.

Job readiness/skills training is provided at the Tanana Valley Campus of the University of Alaska, Fairbanks. Clients with suitable interests and aptitudes are referred to this eight-week job readiness/skills training program. Adult Learning Programs of Alaska (ALPA), a private nonprofit organization, provides adult basic education, testing for the GED, employment training, and job placement services. A child care services center is operated by the Fairbanks Native Association (FNA). The services of the center are free to qualified clients (for example, ASAP, ATAP, and WtW clients).

***Program Office Locations.*** The TCC headquarters is in the city of Fairbanks and operates within six subregions (Fairbanks, Fort Yukon, Galena, Holy Cross, McGrath, and Tok). A part-time WtW case coordinator is stationed at each of the 43 native villages.

#### **4. Program Model(s)**

Each participant served by the WtW program receives an individualized program of support, depending upon prior employment, educational, and training history; the individual's goals; opportunities in the local labor market; and the overall needs of the participant's family in relation to wage levels, child care, and other supportive services needed to secure and retain a job. This includes job readiness, OJT training, adult work experience, classroom training, and other supportive services. TCC has the ability to provide such services to the remote villages for clients who cannot travel.

#### **5. Program Services and Practices**

***Target Population(s).*** People applying for welfare-related programs or benefits such as food stamps, cash assistance, and ASAP.

***Enrollment.*** At the time of the site visit, the TCC WtW program was fully operational, with trained staff in place, and had served more than 446 clients.

***Outreach and Referral.*** Outreach and recruitment is accomplished primarily through a unified intake process, which includes all Native people in the TCC service area applying for welfare benefits.

***Innovative Practices and/or Services.*** TCC’s experience demonstrates the value and importance of sustained cooperation with the state TANF agency in both preparation for and ongoing administration of the tribal TANF program. TCC and the Alaska Division of Public Assistance (DPA) have worked closely together to prepare for the introduction of ASAP and to facilitate its ongoing operation.

The TCC WtW program takes into account the special barriers confronting participants in remote communities in complying with TANF Work-First requirements. Alaska, like many other states, requires TANF recipients to participate in an “up-front” job readiness workshop, and this requirement is applied to ASAP recipients. This requirement is reasonable in Fairbanks but not in the 43 remote villages that TCC serves, because resources are unavailable for such workshops in the villages, and the jobs toward which the workshops are intended to move participants are extremely scarce. As a result, TCC has defined the role of case managers serving the villages more broadly than for case managers serving the Fairbanks area. Case managers serving the villages work with participants on basic job readiness as well as on getting them into some kind of work activity—what TCC calls “comprehensive case management,” as opposed to “regular case management” in the Fairbanks area.



# **GRANTEE PROFILE: THE WHITE EARTH RESERVATION TRIBAL COUNCIL (RTC)**

## **1. Selected Grantee Information**

Location:	North-central Minnesota
Size of Reservation:	837,120 acres (“checkerboard”)
Tribal members:	20,989                      On/near reservation: 6,491
Size of TANF population:	149
Special circumstances:	WtW program integrated into 102-477 program

## **2. Reservation Economy**

The 1997 BIA *Labor Force Report* (the most recent BIA data available) indicates the total tribal enrollment at 20,899, with 6,500 living on or near the reservation. Of the 6,500, more than one-third was not available for work (not job ready, disabled, or retired). The total workforce was 1,895 (29 percent). The actual number of tribal members employed was 848, of whom 85 (10 percent) were living below poverty guidelines. The number not employed was 1,047 (55 percent); however, tribal officials reported that, in the year 1999, the unemployment rate was 45 percent.

The tribe’s economic development efforts are focused on gaming. The tribal casino and hotel, and the tribe itself, are the largest employers of tribal members living on the reservation. The tribe purchased a motel that is adjacent to the casino property, and plans are under way for the construction of a convention center to be attached to the casino. The casino provides amenities, including an indoor pool, that attract visits by a large retired population from Canada.

## **3. Organizational Structure**

***Program Structure.*** The 477 program is operated under the tribe’s Employment and Training Department within the Office of Human Services. The 477 program staff consists of a director and four counselors. An attempt to move the program under the tribal college failed and was abandoned after a new tribal chairman was recently elected.

Under the tribe’s 477 program, WtW participants may be assigned to or be provided with case management, OJT, work experience (WEX), supportive services, job readiness, or education (Adult Basic and Vocational).

***Program Funding.*** The tribe’s WtW funding is consolidated with other formula-funded employment, training, and related services programs as permitted by Public Law 102-477. Other funds consolidated with the tribe’s WtW funding include Workforce Investment Act/Job Training Partnership Act (WIA/JTPA)—Adult and Youth Program Funding; and the Native Employment Works (NEW) program and Child Care Development Funds (CCDF) through the

Department of Health and Human Services (DHHS); Adult Vocational/Direct Employment (AVT-DE), and General Assistance/Employment Training through BIA. The total amount of federal funding for the entire 477 program for reporting period October 1, 1998 through September 30, 1999 was \$952,878.

WtW:

FY 1998 \$265,424

FY 1999 \$281,934

**Key Partners.** The tribe has a cooperative agreement with the Northwest Technical College-Detroit Lakes campus for a satellite program that includes a two-year, state-accredited, electrician training course. The tribe also coordinates training activities with Teamworks, a nonprofit subsidiary of the Midwest Minnesota Community Development Corporation. Teamworks is currently working with four private manufacturers to screen and train employees. Recruitment and training are tailored to the needs of the employers and include assessment of required skills and aptitudes. White Earth 477 clients who participate in the Teamworks program are offered conditional jobs before the start of training as an enticement to participate in and to complete the training. The employers pay the cost of training; some employers provide additional training (beyond the training negotiated with Teamworks) to participants. The White Earth Tribal and Community College (TCC) also provides job readiness classes to clients referred by the 477 program.

**Program Office Locations.** The tribal headquarters is located in White Earth, while the 477 program offices are located approximately 15 miles away in Naytahwaush. Case managers make house calls for clients who cannot make the trip to the 477 program office location.

#### 4. Program Model(s)

The services available through the tribal 477 program focus primarily on education, training, and support services with relatively little emphasis on work experience and OJT. Supportive services funded by the tribe are provided to WtW participants only when resources provided by the state or county are exhausted. The following programs are included in the one-stop 477 program:

- Department of Health and Human Services (DHHS)
  - Child Care and Development Fund (CCDF)
  - Native Employment Works (NEW)
- Department of Labor (DOL)
  - JTPA IV-A Adult Job Training
  - JTPA II-B Summer Youth
  - Welfare to Work (WtW)
- Bureau of Indian Affairs (BIA)
  - Adult Vocational Training (AVT) and Direct Employment (DE)
  - Tribal Work Experience (TWEP)

## 5. Program Services and Practices

**Target Population(s).** The tribe's 477 program began in October 1998. In July 1999, it began to target people eligible for WtW services. Because the WtW services and activities are integrated into the 477 program, the tribe does not make an independent determination of WtW eligibility for participants. According to program staff, the 477 program consistently receives 5 to 10 referrals per month of WtW-eligible individuals from the State TANF Program—the Minnesota Family Investment Program (MFIP).

**Enrollment.** Program statistics for the period October 1, 1998 through September 30, 1999 show that 602 individuals were served by the 477 program; 235 individuals were actively enrolled in the program as of September 30, 1999. Of the 602 participants, 105 (17 percent) had been placed in unsubsidized employment. Of the 105 participants placed, 67 (64 percent) were long-term TANF recipients.

**Outreach and Referral.** All WtW participants are referred by county MFIP agencies. While the tribe undertakes no outreach or recruitment efforts, many tribal members are familiar with the services, self-refer, and are served as “walk-ins.”

**Innovative Practices and/or Services.** With more than 900 employees, the Shooting Star Casino and Hotel are the largest employers in Mahnomen County. The tribe has been focusing much of its economic development activities on the expansion of the casino and related facilities. The casino and hotel, as well as tribal programs, are the greatest source of employment for tribal TANF recipients. Since this is a 24-hour operation, the casino provides round-the-clock child care for its employees.

## Glossary

### **477 Program**

Also referred to simply as “477. Public Law 102-477, the Indian Employment, Training and Related Services Demonstration Act of 1992 authorizes tribal governments to combine federal funds received under formula grant programs related to employment or the world of work under a single plan, with single budget, and a single annual report to the BIA.

### **AFDC**

AFDC (Aid to Families with Dependent Children) was the program administered and funded by federal and State governments to provide financial assistance to needy families. Typically, more than half (55 percent) of the total cost of AFDC payments was funded by the federal government. The TANF block grant replaced the AFDC program.

### **Alaska Native Claims Settlement Act of 1971 (ANCSA)**

Under provisions of ANCSA, Alaska Natives received title to a total of 40 million acres, divided among some 220 Native Villages and 13 Regional Corporations. The Act called for a payment of \$462,500,000 (to be made over an 11-year period from funds in the U.S. Treasury), and an additional \$500 million in mineral revenues.

### **Aleut**

A person descended from natives of the Aleutian Islands belonging to the Inuit-Aleut linguistic group, and classified as a Native American.

### **American Indian Vocational Rehabilitation Program**

Provides grants to tribes to assist eligible persons with disabilities to achieve their employment goals. Services may include: medical and psychological assessment, vocational evaluation counseling and guidance, physical and/or mental restoration services which may include therapy, wheelchairs, hearing aids, etc., special adaptive equipment or licenses, job placement, follow-up after placement to assist with worker and employer satisfaction, personal assistance, supported employment and job coaching. Services may be provided after employment to maintain the job. Funded by the Rehabilitation Services Administration (RSA) in the U.S. Department of Education.



**AmeriCorps**

AmeriCorps, known as the domestic Peace Corps, has more than 40,000 participants in intensive, results-driven service each year. Projects include teaching children to read, making neighborhoods safer, building affordable homes, and responding to natural disasters. Most AmeriCorps members serve with projects like Habitat for Humanity, the American Red Cross, Boys and Girls Clubs, and other local and national organizations.

**Athabascan Indian**

The Athabascan people are believed to have come from Asia about 35,000 years ago across Beringia migrating to Alaska and Canada. Includes the Tlingit, Eyak, and Haida peoples as well as the Ingalik, Koyukon, Tanana, Holikachuk, Gwich'in, Han, Upper Tanana, Ahtna, and Tanaina tribes.

**Balanced Budget Act of 1997 (BBA)**

The Balanced Budget Act (BBA) of 1997 (Public Law 105-33) was signed into law by President Clinton in August 1997. This legislation funds the WtW Grants Program and mandates an evaluation of the Program. The Act also makes significant changes to the Medicare and Medicaid programs, and expands the services provided by the Health Care Financing Administration (HCFA) through the new Children's Health Insurance Program (Title XXI).

**Bureau of Indian Affairs (BIA)**

An agency of the U.S. Department of Interior, generally responsible for administering federal policy for American Indians and Alaska Natives.

**Checkerboard Reservation**

An Indian reservation on which some land has been purchased or otherwise obtained by non-Indians.

**Child Care and Development Fund (CCDF)**

The Child Care and Development Fund (CCDF) provides grants to States, Territories, and tribes to assist low- income families in accessing quality child care for children while parents work or participate in education or training programs. The CCDF brings together four federal child care subsidy programs and allows Child Care Lead Agencies to design comprehensive, integrated service delivery systems to meet the needs of low-income families.

**Children's Health Insurance Program (CHIP)**

Created by the Balanced Budget Act of 1997, Title XXI of the Social Security Act, and sets aside \$24 billion over 5 years for States to provide new health coverage for millions of children--the largest children's health care investment since the creation of Medicaid in 1965.

<b>Clan</b>	A division within a tribe, involving biological or cultural relations among its members; contributes to the members identity and roles with in the clan and tribe.
<b>Closed Reservation</b>	An Indian reservation where the land is contiguous and either owned by the tribe or is held in trust for the tribe by the United States. Generally the land cannot be sold to or by individuals.
<b>Division of Indian and Native American Programs (DINAP)</b>	The Office within the U.S. Department of Labor that works with the Indian and Native American employment and training service providers. Manages tribal components of the Workforce Investment Act (WIA) and WtW Program.
<b>Division of Tribal Services (ACF, DHHS)</b>	Responsible for working with tribal governments and, where appropriate, State and federal agencies regarding the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PL 104-193) and related legislation. DTS is responsible for development of regulations and guidelines and for providing leadership, policy direction, technical assistance, and coordination of tribal services programs.
<b>Economic Development Administration (EDA)</b>	An agency of the U.S. Department of Commerce. EDA works in partnership with State and local governments, regional economic development districts, public and private nonprofit organizations, and Indian tribes to empower communities to plan and implement locally and regionally developed economic development and revitalization strategies to create jobs, reduce unemployment, and alleviate economic distress.
<b>Empowerment Zone (EZ)</b>	Enacted as part of the Omnibus Budget Reconciliation Act of 1993. The EZ Program is designed to help historically distressed communities revitalize by using tax incentives to promote business development and job creation. The desired outcome is new businesses activity that creates jobs for zone residents and improves the economic health of a community.
<b>Enterprise Zone/Enterprise Communities</b>	A program of the U.S. Department of Housing and Urban Development (HUD). The aim of the EZ/EC Initiative is to serve as a catalyst for locally generated strategies and activities leading to sustained economic opportunity; build partnerships and community capacity; foster reform in the relationship between citizens and government, as well as among levels of government; and meet high standards for accountability.

<b>Eskimo</b>	There are three culturally distinct groups of Inuit (called Eskimo by some) people who inhabit the region of Alaska. The Inupiat reside on the Seward Peninsula and the King and Diomed Islands. The Central Yupik reside primarily in villages south of Unalakleet, and Siberian Yupik live on St. Lawrence Island. The Inuit people have lived in this region as an identifiable culture for at least 3,000 years.
<b>GED</b>	The General Educational Development (GED) credential is roughly equivalent to a high school diploma and is obtained by passing a series of five tests in areas such as writing skills, social studies, science, interpreting literature and the arts, and mathematics.
<b>Goodwill Industries</b>	A nonprofit organization that provides employment and training services to individuals with disabilities, and with limited work histories. Goodwill has served as a contractor to tribal E&T programs.
<b>Hogan</b>	An eight-sided dwelling used by the Navajo. Usually made from logs or planks or adobe bricks with sod or clay for filler. The roof is covered with sod.
<b>Indian</b>	The name was first used by Columbus to describe the people he encountered in the Americas, believing that he had reached India. The name is now meant to include the aboriginal inhabitants of North and South America.
<b>Indian Commerce Clause</b>	Article 1, Section 8, Clause 3 of the Constitution: To regulate Commerce with foreign Nations, and among the several States, and with the Indian Tribes.
<b>Indian Country</b>	“Indian country” refers to Indian reservations, all dependent Indian communities within the borders of the U.S. whether within or without the limits of a State, and all Indian allotments, the Indian titles to which have not been extinguished (18 U.S.C. Section 1151).
<b>Indian Health Service (IHS)</b>	The IHS is an agency within the U.S. Department of Health and Human Services that is responsible for providing health services to American Indians and Alaska Natives.
<b>Indian Trade and Intercourse Act of 1790</b>	The Act brought all commerce involving Indian tribes under the exclusive control of the federal government.

**Indian Self-Determination and Education Assistance Act of 1975 (PL 93-638)**

Also known as ISEAA, recognizes the obligation of the United States to support maximum participation by Native Americans in federal programs and services to Indian communities, including Education. Originally, the ISEAA applied only to the activities and programs of the BIA. Public Law 100-472 (102 Stat. 2285) expanded ISEAA to all bureaus within the Department of the Interior.

**Job Corps**

Job Corps is the nation's largest and most comprehensive residential education and job training program for at-risk youth, ages 16 through 24. Job Corps is a public-private partnership administered by the U.S. Department of Labor.

**Job Training and Partnership Act (JTPA)**

Provides training and assistance to dislocated workers and individuals whose income is below the federal poverty level. JTPA assistance may include career assessment services, job seeking and job search preparation, classroom training assistance, and on-the-job training. JTPA also authorizes specialized programs for all eligible youth between the ages of 14 and 21. The Workforce Investment Act (WIA) supplanted JTPA.

**Minority Business Development Administration (MBDA)**

An Agency within the U.S. Department of Commerce. MBDA is the only federal Agency created specifically to foster the creation, growth and expansion of minority-owned businesses in America. The Agency was established in 1969 by Executive Order, and its role was expanded in 1971.

**Native Employment Works (NEW)**

Authorized under the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, NEW is a tribal work activities program that replaced the Tribal Job Opportunities and Basic Skills Training (JOBS) Program. The funding level for the NEW Program is set at the FY 1994 level by PRWORA (\$7,633,287). Only those Indian Tribes and Alaska Native organizations that operated a Tribal JOBS Program in FY 1995 are eligible for the NEW Program.

**Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) PL 104-193**

The Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 changed welfare from a federal entitlement program to a time-limited, state run assistance program. PRWORA replaced the AFDC Program with the TANF Block Grant Program. States received increased flexibility to design their own welfare programs. The Act recognizes the obligation of the United States to provide for maximum participation by Native Americans in federal programs and services to Indian communities, including education.

**Retrocession**

The TANF regulations recognize that Tribes, like States, voluntarily implement a TANF program for needy families and that there may be circumstances under which a Tribe will withdraw from operation of the TANF program. The regulations provide for Tribal retrocession of the TANF program back to the State

**Sovereign Immunity**

A legal doctrine which, under some circumstances, protects the federal, State, and tribal governments within the United States from lawsuits which might cause those governments to pay out money, real estate, or goods from the governmental treasury.

**Summer Youth Employment Program**

This program provides grants to States, tribes, and communities for summer youth employment programs. Funds are provided based on unemployment and poverty levels. Program activities enhance basic skills, encourage school completion, provide exposure to the world of work and enhance citizenship skills

**Temporary Assistance for Needy Families (TANF)**

Title I of P.L. 104-193 amends part A of title IV of the Social Security Act by replacing the Aid to Families with Dependent Children (AFDC) program, the Job Opportunities and Basic Skills Training (JOBS) program and the Emergency Assistance (EA) program with the Temporary Assistance for Needy Families (TANF) program. Under the new part A of title IV of the Social Security Act, open ended funding and guaranteed individual entitlement to public assistance have been repealed. TANF gives both States and Federally recognized Indian tribes new flexibility in the design of welfare programs, which promote work and responsibility and strengthen families.

**Test of Adult Basic Education (TABE)**

The most widely used test for adult basic education. The TABE provides measurement of reading, mathematics, and language skills for adults. Assessment using TABE gives the information needed to place learners in the appropriate levels for their particular skill deficiencies.

**Tribal Consortia**

An organization established by a group of tribes for the purpose of improving services to tribal members. Examples include the Tanana Chiefs Conference (TCC) and the California Indian Manpower Consortium (CIMC).

**Tribal Employment Rights**

A program designed to ensure the protection of the employment rights of Indians working on or near reservations. Generally, every tribe has a Tribal Employment Rights Office (TERO).

**Tribal Gaming**

A generic term usually describing casinos, bingo, and other activities involving betting or gambling operated on tribal lands. Tribal gaming operations are regulated, to some degree, at four distinct levels - tribal government, State government, the National Indian Gaming Commission, and federal agencies such as the U.S. Justice Department, the FBI, the IRS and the BIA. Compacts between States and tribes give States some regulatory power over Indian gaming; however, the Indian Gaming Regulatory Act (IGRA) recognizes that the federal government has primary responsibility for the regulation of gaming in "Indian country."

**Tribal Welfare-to-Work Grants Program**

The portion of the WtW Program used by Indian tribes as authorized by the BBA. The Program is administered by the Division of Indian and Native American Programs (DINAP) in ETA, DOL.

**Workforce Investment Act (WIA) of 1998**

Required that State Workforce Investment Boards (WIBs) replace Private Industry Councils (PICs) and that States develop 5-year strategic plans. Governors designate local "workforce investment areas" and oversee local WIBs. Youth councils are to be established as a subgroup of the local WIB to guide the development and operation of programs for youth. Customers will benefit from a "One-Stop" delivery system, with career centers in their neighborhoods where they can access core employment services and be referred directly to job training, education, or other services.

**Workforce Investment Board (WIB).**

Replaces Private Industry Councils (PICs) under WIA.

