

**A REPORTING SYSTEM FOR Pub. L. 102-477,
INDIAN EMPLOYMENT, TRAINING AND RELATED SERVICES DEMONSTRATION PROJECT**

GENERAL OVERVIEW OF THE PROGRAM Pub. L. 102-477 allows tribes to integrate the following federal formula-funded programs: Department of Labor's Workforce Investment Act (WIA), Adult and Youth programs, Welfare to Work (WtW) programs; the Department of Health and Human Services' Temporary Assistance for Needy Families (TANF), Native Employment Works (NEW) program and Child Care Development Program, and the Bureau of Indian Affairs' Adult Vocational Training, Direct Employment, Higher Education, Adult Education, Johnson O'Malley, General Assistance and Tribal Work Experience programs. Participation in the program is voluntary and is intended to demonstrate how Indian tribal governments can integrate employment, training and related services to improve the effectiveness of services, reduce joblessness and serve tribally-determined goals.

Paperwork Reduction Act Statement: The information being collected meets the requirements of Pub.L. 102-477 and is composed of three summaries: a Narrative Report, a Statistical Report and a Financial Status Report with seven additional attachments numbered 12(a)-(g). Response is required to obtain benefits of the program. The reports are used to monitor the progress of the grantees in delivering services to tribal members, to identify unmet needs, to identify any other problems, and to provide information to justify budget submissions by the three federal agencies involved. Only tribes who have voluntarily applied to participate in this project will submit the annual report. As of January 1, 2003, there are 49 grantees representing approximately 240 federally-recognized tribes voluntarily participating. The report takes about 16 hours to complete. Some tribes have automated the data collection and thus may require less time. Tribes are required to retain the data during the life of the grant. An agency may not request or sponsor a collection of information, and a person is not required to respond to a request if a valid OMB control number is not provided. The OMB control number for this collection is 1076-0135. Comments concerning the survey can be sent to Lynn Forcia, Office of Economic Development, Bureau of the Indian Affairs, 1951 Constitution Avenue N.W., Washington, D.C. 20245, Mail Stop 20 SIB. Please note: comments, names and addresses of commentators are available for public review during regular business hours. If you wish us to withhold this information, you must state that prominently at the beginning of your comment. We will honor your request to the extent allowable by law.

Privacy Act Statement: The information being collected for the Pub.L. 102-477 is covered by a system of records which was published in the Federal Register August 21, 1990, 55 FR 34087. The reports contain information used to monitor the progress of the grantees in delivering services to tribal members, to identify unmet needs, to identify any other problems, and to provide information to justify budget submissions by the three federal agencies involved.

NARRATIVE REPORT The primary reporting mechanism for Pub. L. 102-477 initiative for grantees is the narrative report. This makes the reporting system very different from the current systems for the individual employment, training and work services programs, which are designed principally to report numbers according to federally-set definitions. By using a narrative format as the primary reporting system for Pub. L. 102-477, the tribe will be able to describe what it is trying to accomplish with its employment, training and work services resources in its own circumstances and the extent to which it has succeeded.

The narrative report may be in any format. The narrative should include the following:

1. Summarize the goals and objectives including the approved performance standards identified in the tribes plan for the reporting period and summarize the accomplishments against each goal and objective. If the performance standards were not met, the narrative should include a discussion why each standard was not met.
2. Summarize any problems or identifiable unmet needs in the program and the tribe's strategy and resources needed to address such problems or needs.
3. The narrative includes numerical and descriptive information with respect to the various program activities and all related aspects of the tribes's approval plan. If the tribe has a high non-

positive termination rate, the narrative should summarize the problems encountered and what steps, if any, the tribe is taking to address the issue.

4. The narrative shows the extent of participation in other activities such as job readiness, supportive services, and any post employment services provided to place long-term welfare recipients into employment and the success of such services.
5. The narrative should include a statement of the Pub. L. 102-477 initiative relating to any economic development activities of the tribe. This should include a discussion of any jobs created.
6. The narrative provides additional information on child care, including the number of children receiving center-based care, group home care, family home care and care in the child's own home and any activities to improve the quality of child care. If a grantee has Department of Health and Human Services, Child Care Development Funds in the approved plan, the narrative should include a description of child care activities during the past year.
7. The narrative can provide additional information including "Completed Other Plan Objectives" and "Barriers to Employment" which are reported on the Statistical Summary.

Grantees are asked to address the components specific to their tribal Pub. L. 102-477 Plan. Case Examples and inclusion of quantitative and anecdotal information is encouraged. Grantees may choose to compare current to previous year statistics. Within the narrative report, each grantee is asked to address the following elements, when applicable: barriers to success or challenges faced by individual participants, programmatic barriers, economic conditions of the tribal service area, unmet needs, limitation of resources, outcomes of program goals/objectives/measurements, success stories and other accomplishments of note.

If unemployment/(UI) records are made available to you, please provide the number of participants obtaining a job from assistance in the Pub. L. 102-477 program, that were employed 12 months after termination. If unemployment records are not available to you it is not necessary to report this information.

No specific format is required. For readability purposes it is suggested that the narrative report be typed, using 1.5 or double spaced lines, with at least one-inch margins, and include page numbers (1 of ##).

Response to the narrative request is mandatory in accordance with Pub. L. 102-477. The revised narrative and forms collect data required for all government-wide Federal employment and training programs.

STATISTICAL SUMMARY

The tribe's report will also include a statistical summary of the people participating in and terminating from the program, their characteristics, including youth and adult participants and cash recipients, the services they received and their outcomes. The information being collected in the statistical summary is to determine levels of program activity and to demonstrate how well a plan was executed in comparison to its proposed goals. Response to the statistical summary request is mandatory in accordance with Pub. L. 102-477. In order to provide standard, meaningful data on the demonstration project as a whole, each tribe's statistical summary will be provided in a uniform format (copy attached).

FINANCIAL STATUS REPORT

The SF 269A (Financial Status Report - Short Form) will be used for financial reporting for the Pub. L. 102-477. Question 12 has seven parts. It includes: six certifications identified as (a) - (g). This attachment will be used to certify compliance with the statutory and related regulatory requirements concerning economic development activities, employer relocation, program income and refunds and rebates received for tribes receiving funds from the Department of Labor and from the Child Care Development Fund, Department of Health and Human Services. An additional form, identified as 12 (g) "Tribal Temporary Assistance for Needy Families (TANF) ACF-102-477 Financial Report" is also required. Only those tribes with TANF incorporated into Pub. L. 102-477 are required to complete 12(g). The information being collected on the Financial Status Report is to determine the extent to which a tribe is meeting its goals. Response to the Financial Status Report request is mandatory in accordance with Pub. L. 102-477. Question 12(g) columns (B) and (C) are optional for tribes unless a TANF penalty has been imposed.