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

SUPPORTING STATEMENT A: JUSTIFICATION

REQUEST FOR CLEARANCE

Submitted By:

Office of Planning, Research and Evaluation

Administration for Children and Families

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SUPPORTING STATEMENT

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PART A. Justification

This Supporting Statement provides information for a proposed data collection effort to determine how Tribal Temporary Assistance for Needy Families (TANF) programs are being implemented in order to provide services for tribal members. The study is being conducted for the Office of Planning, Research, and Evaluation (OPRE), within the Administration for Children and Families (ACF), Department of Health and Human Services by the Urban Institute (UI) and its subcontractor Support Services International, Inc. (SSI).

The goals of the study are to 1) provide an in-depth, systematic description of program implementation, operations, outputs, and outcomes in selected sites, 2) identify promising practices, and 3) identify other areas for further study.

A.1. Circumstances That Make the Collection of Information Necessary

Recognizing the sovereignty of American Indian tribes and the special circumstances of Alaska Native villages and corporations, the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 gave American Indian tribes and Alaska Native Villages the option to administer TANF programs either alone or as part of a consortium with other tribes/villages rather than receiving benefits and services from State TANF programs.

Currently there are 66 approved Tribal TANF programs serving about 300 American Indian (AI) tribes and Alaska Native (AN) villages and non-reservation AI/AN populations of over 120 counties (including several major metropolitan areas, designated near-reservation towns, and 6 Alaska Native Regional Corporation areas).

Although the general welfare population and State TANF programs have been widely studied, less is known about the characteristics, implementation, and promising practices of tribal TANF programs. Little research has been done examining how tribes use the flexibilities allowed under PRWORA or how they coordinate TANF with other programs. This study is especially important given the differences between tribal TANF and non-Tribal TANF implementation requirements, the differing cultural traditions of AI/AN people and other populations in the United States, the different economic conditions on Indian reservations, and the special relationship between tribes and the federal government.

This study will provide documentation and lessons learned about diverse programmatic approaches to the implementation of Tribal TANF programs. The basic research questions for this study have been organized into five topics:

- External/contextual factors
- Tribal TANF organization and management
- Tribal TANF policies/priorities
- Service delivery practices

- Outputs and outcomes

Appendix 1 contains a copy of the Conceptual Framework designed for this study to guide the documentation of program models, service delivery approaches, client flow systems, and inter-program collaborative networks.

A.2. How, by Whom, and for What Purpose the Information is to be Used

How the Information will be used.

The findings from the study will be used to inform the ACF, tribes operating TANF programs, as well as tribes considering assuming responsibility for the Program, regarding 1) the lessons learned from diverse approaches used in implementing Tribal TANF programs and 2) identification of areas for further study.

Who Will Collect the Information?

The study contractor will collect data through face-to-face interviews with key informants; program data submitted by Tribal TANF grantees as well as Census and other existing data that will be analyzed. Each data collection category is discussed below.

Primary Data Collection.

OMB approval is sought for the on-site data collection. On-site interviews will occur at 4 Tribal TANF sites with TANF officials, managers, staff; managers and staff from related programs (e.g., economic development, social services); a focus group will be held at each of the 4 sites with a sample of current and past TANF recipients. The on-site interview and focus group categories include:

- Tribal TANF Officials;
- Tribal TANF Managers and Staff;
- TANF-Related Program Managers and Staff as appropriate (e.g., workforce development, education/post-secondary education, social services, child welfare, youth services, child support enforcement);
- Tribal TANF Participants (focus group).

Since not all topics will be relevant to all participants, questions will be chosen based on the individual interviewee's knowledge and expertise. In addition to asking about the specific policies and practices of tribal TANF programs, it is important to gather information about the context in which the program operates, including the economic conditions, resources available, and structure of support within the community, especially because these might differ from the contexts of non-tribal TANF programs. While our secondary data analysis will illuminate some contextual information, particularly about socioeconomic conditions, the perspectives and experiences of people involved with the program are important for more fully understanding the external context in which the tribal TANF program operates, which will help us understand the policy and practice choices tribes have made. Questions about tribal organization and management will help to further illuminate the tribal structure in which the program operates.

Assumptions based on experience with state government organization and management may not apply in the tribal context, so it will be important to discuss this topic during the site visits. The following are examples of research topics and related questions to be addressed. The highest priority questions are in **bold**. The other questions will become probes, sub-questions and/or alternate questions if sufficient time and resources allow.

- **External/contextual factors:**
  - ➢ What are the perceptions of the socioeconomic conditions that affect Tribal TANF clients and communities?
  - ➢ What is the perception of the status of economic development/employment availability in the tribal community?
  - ➢ What non-TANF resources are available for service delivery, social services, education, training, and employment?
  - ➢ **What barriers do TANF clients face related to getting to work? Do clients have access to transportation?**
  - ➢ **What resources do Tribal TANF programs and their clients have access to in tribal communities? What activities are available in remote areas? What options are there for the lowest-skill recipients?**
  - ➢ How are common, mainstream social problems such as domestic violence, substance abuse/addiction, etc., experienced and addressed in tribal communities?
  - ➢ To what extent do tribal members move between service areas served by Tribal TANF and areas served by State TANF programs, and what is the tribe's approach to addressing this situation?

- **Tribal TANF organization and management:**
  - ➢ **What is the tribe's administrative approach to providing TANF-related services and how is it being implemented? Are welfare-related services provided directly by the tribe or through agreements, contracts or compacts with intertribal consortia, States, or other entities? What is the Tribal TANF program's relationship with the State?**
  - ➢ What is the tribe's level of cross-program coordination and tribe's 477 status?
  - ➢ What population and service areas are being served?
  - ➢ **To what extent is Tribal TANF coordinated with other supports (SNAP, social services, child support enforcement, vocational education, workforce development, post-secondary education/training, and economic development?)**
  - ➢ How is the tribe identifying, incorporating, and enhancing employment opportunities for recipients (e.g., subsidized employment; blended funding)?
  - ➢ What non-cash innovations or initiatives have been developed with TANF funds (e.g., fatherhood programs, school-to-work, apprenticeships, and family stability)?
  - ➢ What is the tribe's approach to outreach and providing information to potential recipients?

- **Tribal TANF policies/priorities:**

TANF Priorities

➢ **What are the tribe's TANF overarching goals and policies?**
➢ What is the balance among priorities and objectives (e.g., participation, work requirements, skills development, and poverty reduction)?
➢ How does the Tribal TANF program define self-sufficiency?
➢ Are training and education components emphasized and how are they structured (employer-based training, tribal institutions, non-tribal, combination)?

TANF Policies

➢ What are the tribe's work participation requirements? How are they being implemented?
➢ What policies exist regarding subsidized employment, job training, education/post-secondary education, post-employment training?
➢ What are the time limits and how are they being implemented?
➢ How are penalties (sanctions) applied against individuals? What is known about the frequency and types of sanctions?
➢ When did the tribe develop and implement its program policies?
➢ **How are these policies different from mainstream TANF policies? What, if any, adaptations were made to accommodate tribal culture and circumstances?**

- **Service delivery practices:**
  ➢ Are TANF eligibility and services activities integrated?
  ➢ What supportive services are being provided to eligible families?
  ➢ **What types of innovative strategies are in place (e.g., assessment, job readiness, skills development, contextual education, workplace based training, apprenticeships, subsidized employment, participant or staff incentives)?**
  ➢ What education, training, and job placement opportunities are available to clients?
  ➢ Are there service delivery partnerships (contractors, cooperative agreements, program integration)?
  ➢ Are clients referred elsewhere for services? What follow-up occurs for clients referred to services or placed in jobs?
  ➢ When did the tribe open service offices? How accessible are those offices to their clients?
  ➢ What are the processes for eligibility/intake/redetermination? What, if any, assessments and screenings are used?
  ➢ To what extent are information systems and fiscal reporting systems automated (as opposed to paper-based)?
  ➢ When did the tribe develop and implement program procedures? How and when were cases phased into the Tribal TANF program? When did the tribe begin to operate its payroll system?
  ➢ What are the behaviors, skills, knowledge, and attitudes needed by Tribal TANF program staff in order for them to effectively serve their clients?

➢ What training is provided to staff? Who provides the training?
➢ **What culture traditions and practices inform the provision of services? How are elements of tribal culture integrated into service delivery?**
➢ To what extent is Tribal TANF coordinated with other supports (e.g., SNAP, childcare, education)?

- **Outputs and outcomes:**
  ➢ **What is the tribe's work participation rate and how has it changed over time?** (Please explain that the tribe's work participation rate and its change over time will not be linked to the introduction of Tribal TANF)
  ➢ How do the work requirements affect the work participation rate?
  ➢ What are the employment outcomes for Tribal TANF clients?
  ➢ What have been the income gains of tribal clients?
  ➢ What have been the skills improvements for Tribal TANF clients?
  ➢ To what extent have families lost eligibility due to time limits?
  ➢ How has the tribe used performance information to make changes to its TANF organization, policies, or service delivery?
  ➢ **How have the Tribal TANF program and client outcomes affected the larger tribal community?**

Secondary data collection. Sources for publicly-available secondary data collection include:
- Tribal TANF plans
- 411(A) quarterly reports
- ACF annual reports to Congress
- Decennial Census
- American Community Survey
- County Business Patterns
- Bureau of Labor Statistics
- Bureau of Indian Affairs

The secondary data will be used to enrich context provided by the primary data as well as serving as measures of change over time and/or comparisons for assessing the reliability and validity of the primary data. All of these secondary data are publicly available and none contain confidential information.

Staff training.

All members of the research team have extensive experience conducting qualitative data collection and analyses and are skilled in qualitative methodologies used in field-oriented research, including semi-structured interviews, focus groups, and direct observation. Specific orientation and training on the particular data collection instruments for this study will be conducted to ensure fidelity to the protocol and consistency of coding.

Purpose of the Data Collection.

Findings from the study will provide documentation and insight on how the tribal context influences TANF implementation, the relationship between that context and the outputs and

outcomes, how both administrators and recipients experience the implementation of tribal TANF, and identify emerging areas of interest for future research.

A.3. Use of Automated, Electronic, Mechanical, or Other Technological Collection Techniques to Reduce Burden

Whenever possible, information technology will be used in data collection efforts to reduce burden on site staff and focus group participants. We believe the most efficient way to collect the information needed is to interview site staff and conduct focus groups of program participants. The study will not be using CAPI.

Notes taken during the interviews and focus groups will be analyzed later with the assistance of the NVivo software program. The NVivo software program is designed to assist in managing, structuring, and analyzing qualitative data such as interview text through functions that support the classification, sorting, and comparing of text units. Because sections of text can be coded with multiple codes and cross-referenced, and intersections and unions of codes can be easily classified for analysis, the analyst can conduct queries that analyze patterns and associations within individual interviews and across interviews. Functions that allow for research notes to be attached to sections of text in an ongoing fashion aid with the identification of and analysis of emergent themes and analytic ideas.

A.4. Efforts to Identify Duplication

The information collection will not duplicate information that is already available. The contractor will review and extract needed information from existing materials such Tribal TANF plans, quarterly reports and ACF annual reports to Congress.

A.5. Methods to Minimize the Burden on Small Businesses or Other Small Entities

The information collection activity will not solicit information from small businesses or other small entities.

A.6. Consequences if Data are not Collected

If the study data are not collected, analyzed, reported, and disseminated; ACF, current and prospective Tribal TANF grantees, Congress, and other stakeholders will make decisions, develop policies and programs, and/or allocate resources with little or stale information. The consequences of decision-making in such circumstances are likely to negatively impact individuals, families, and communities where TANF eligible (i.e., low-income) individuals reside.

A.7. Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320 (Controlling Paperwork Burdens on the Public). There are no special circumstances that require deviation from these guidelines.

A.8. Federal Register Notice and Consultations with Persons Outside the Agency

The 60-day notice was published in the Federal Register, Volume 76, No. 212 on Wednesday, November 2, 2011. Appendix 2 contains a copy. During the notice and comment period, ACF received no comments or requests for the guides.

It is particularly important in this study that data collection and analysis be sensitive to the unique historical, cultural, and traditional contexts of each tribe included in the project. The emphasis on traditional values, language, empowerment, and sustainable economic development vary across communities and represent essential contextual features that must be considered when identifying program performance, best practices and their replicability. To address these concerns, a Tribal Advisory Group (TAG) of experts on Tribal TANF was established to advise the major study issues and activities. The TAG consists of 4 persons:

Tribal Advisory Group (TAG)

Don Shircel
Director, Family Services
Tanana Chiefs Conference, Inc.
122 First Avenue, Suite 600
Fairbanks, AK 99071-4897

Leila Help-Tulley, M.S.W., Training Manager,
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4642 Pershing Place
St. Louis, MO 63108

Sarah L. Kastelic, PhD
Chief of Staff, National Indian Child Welfare Association
5100 SW Macadam Avenue, Suite 300
Portland, OR 97239

A.9. Remuneration to Respondents

To help offset the burden for selected program participants who agree to participate in a focus group, the contractor plans to give each participant a $25.00 gift card. The incentive payment will be provided at the time of the focus group, after careful explanation of the procedures for the focus group. Any individual who chooses not to participate after receiving the detailed explanation will be provided the incentive payment so that the payment is not perceived as a

coercion to participate. It is anticipated that there will be a total of 20 clients participating in the focus groups. Therefore, the total remuneration will be $500.00.

A.10. Assurances of Privacy

Every effort will be made to maintain the privacy of respondents, to the extent permitted by law. All respondents included in the study will be informed that information they provide will be used only for the purpose of this research. Individuals will not be cited as sources of information in prepared reports.

A.11. Questions of a Sensitive Nature

There are no questions of a sensitive nature in this data collection.

A.12. Estimates of the Burden of the Collection of Information

A total of approximately 56 individuals will be interviewed. This includes approximately 16 Tribal TANF administrators and staff; 20 staff of related programs, and 20 Tribal TANF clients. As shown in Table 1, the total number of annual burden hours for this effort is 78. This is a one-time data collection effort. Please note that the burden rates below are revised since the 60 day Federal Register Notice to reflect lower burden hours.

The total annual cost burden to respondents for this information collection is $1,424.86 as shown in Table 1: Annual Burden Estimates. This figure is based the mean wages for the relevant occupations (Administrative Services Managers, Social Workers, Vocational Counselors, Social & Human Service Specialists, Unskilled Workers) in Arizona, as reported in the 2010 U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Estimates.

Table 1: Annual Burden Estimates						
Instrument	Annual number of respondents	Number of responses per respondent	Average burden hours per response	Total annual burden hours	Average Hourly Wage	Total Annual Cost
Discussion Guide for use with Tribal TANF Officials	4	1	1.5	6	$29.45	$176.70
Discussion Guide for use with Tribal TANF Managers and Staff	12	1	1	12	$22.78	$273.36
Discussion Guide for use with Tribal TANF Participants Focus Group	20	1	2	40	$12.98	$519.20

Discussion guide for use with TANF-Related Program Managers and Staff	20	1	1	20	$22.78	$455.6
All instruments:				78		$1,424.86

A.13. Cost Burden to Respondent or Record Keepers

There are no additional costs than those outlined in A.12.

A.14. Estimate of Annual Cost to the Government

The estimated annual cost to the federal government for the proposed data collection and analysis is $157,087. This figure includes labor hours, other direct costs (photocopying, mailing, travel, etc.) and burden rates.

A.15. Reasons for Any Program Changes or Adjustments

This submission is a new request for approval; there is no change in burden.

A.16. Plans for Tabulation, Analysis, and Publication

To achieve the objective of identifying and documenting best practices, the contractor will use a combination of administrative data from tribal program management systems and qualitative data from in-depth site visits to identify the main factors that appear to represent best practices; the organizational, tribal, administrative, and service delivery context within which they appear; and aspects of particular approaches or models that may be replicable elsewhere.

Once information has been gathered from each of the selected Tribal TANF programs, implementation science methods that systematically document program models, service delivery approaches, client flow systems, and inter-program collaborative networks will be used to describe the best practices in the study sites and if they are replicable elsewhere. The contractor will identify differences and commonalities among the sites visited in terms of their program operations as well as their program outcomes.

By combining quantitative analysis with qualitative descriptive analysis for the study sites, the results of the study will yield more useful information about potentially promising practices that are appropriate in different tribal contexts. The study design is based on a conceptual framework that describes how the programs operate at the tribal level. According to this model, program outcomes can be attributed to a variety of inputs as well as feedback from outputs. To the extent feasible, the contractor will analyze the relationships among contextual factors, implementation features, and Tribal TANF outputs and outcomes, using both qualitative and quantitative data to support our descriptions of the interaction between these components.

Quantitative Data Collection and Analysis.

Several different sources of quantitative data will be used to address questions about Tribal TANF that are based on our conceptual framework. A detailed quantitative analysis plan is included in Appendix 3. Some quantitative data analysis such as socioeconomic data, demographic trends, and employment data will be collected for all 66 tribes/tribal consortia administering TANF programs using data from ACF Monthly Reports and ACF Annual Reports. These reports are accessible by the contractor without burdening the 66 Tribal TANF programs. Whereas budget constraints will limit data collection from tribes (interviews, focus groups, program data on recipients) under this study, the availability of various types of economic and demographic **(**e.g., Census and Bureau of Labor Statistics**)** data at the national level will allow us to access and analyze some data on all tribes administering the program. The contractor will identify the geographies associated with participating tribes and link them to relevant national and state data indicators. This will allow us to produce a picture of the regions participating in the Tribal TANF programs, make cross site comparisons of existing conditions, and assess potential need for TANF over time. Data analyses will compare each of the selected sites with each other, with their surrounding areas, and with all other Tribal TANF service areas as a whole. Data for other Tribal TANF service areas will not be analyzed individually. The approach to quantitative analysis will draw upon other evaluation designs that the Urban Institute has done on tribal sites. Though not an impact study, this analysis will focus on external factors such as labor market and population characteristics, community need, and outcome performance metrics. While the goal of our study is not to evaluate implementation of TANF programs or conduct a rigorous impact analysis, we will link our conceptual model with key quantitative data indicators in order to better describe how Tribal TANF programs are operating, how they differ from one another, and how outcomes have changed over time.

Site visits will begin upon OMB approval. Findings from this effort will contribute to the final project report, which is expected August 2013.

Qualitative Data Analysis

The analysis plan for the in-depth interview data involves several steps that will allow the research team to draw inferences from the data to answer the study's research questions. The analysis process will primarily revolve around uncovering and interpreting anticipated, as well as emergent themes within and across interviews. The data will be coded and analyzed with an eye toward addressing the key research question of how Tribal TANF programs are being implemented in order to provide services for tribal members and further exploring hypotheses. The initial coding structure will include a list of codes that 1) will capture the key topic areas, supporting topics and subtopics identified in the research question, 2) identify subpopulation-specific issues, 3) illustrate additional themes that were identified during researcher debriefings during and after the fielding of the interviews and determined by the research team to be worthy of systematic investigation. All interviews from the first site visit will be coded together as a research team, with discussion of each to resolve inconsistencies in coding. Interviews from the remaining site visits will be coded by junior members of the research team participating in the site visits and reviewed by a senior member of the research team.

All coding will be done in NVivo, a qualitative software program. The coding approach will involve assigning a code (or multiple codes) to "chunks" of text (e.g., specific interview lines that address themes defined by the codes). While coding and analyzing the interviews using this initial coding structure, we expect additional topics and themes will emerge from the data. These new topics and themes will be incorporated into the initial structure as new codes which will be applied to all of the remaining interviews and to already coded transcripts. This iterative process that starts with an initial set of codes, adding emergent codes, recoding, adding additional codes, etc., is a common approach to the coding of qualitative interview data that allows for pre-existing as well as emergent ideas to be systematically coded and analyzed.

A.17. Approval to Not Display the OMB Expiration Data

The OMB approval number and expiration date will be printed on the interview guides used in this collection of information.

A.18. Exception to the Certification Statement

No exceptions are necessary for this information collection.

APPENDICES

Appendix 1: Conceptual Framework

Appendix 2: 60-Day Notice for Federal Register

Appendix 3: Detailed Quantitative Analysis Plan

Appendix 4: Site Selection Matrix and Program Selection Matrix

Appendix 5: Invitation Letter to 9 Tribal TANF Project Directors