

**OMB Information Collection Request**

**Understanding Urban American Indians' and Alaska Natives' Interactions  
with ACF Services and Programs**

**Supporting Statement A**

**October 2012**

Submitted By:  
Office of Planning, Research and Evaluation  
Administration for Children and Families  
U.S. Department of Health and Human Services

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## **Part A: Justification**

This section provides supporting statements for each of the eighteen points outlined in Part A of the OMB guidelines for the collection of information for the study, *Understanding Urban American Indians' and Alaska Natives' Interactions with ACF Services and Programs*. Data for the study will be collected via 70 in-depth telephone interviews: We will conduct interviews with directors of 35 selected Urban Indian Centers (UICs) and an additional 35 interviews with directors of local state agencies that administer ACF-funded services and that, theoretically, are working with the same populations served by our selected UICs. This submission seeks clearance for the data collection activities that will take place via the telephone interviews.

### **A1. Necessity for the Data Collection**

The Administration for Native Americans and the Office of Planning, Research, and Evaluation, both within the Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services (HHS) seek approval for the data collection activities in American Indian/Alaska Native Tribal communities described in this request<sup>1</sup>. The aim of this exploratory study is threefold: a) to understand the barriers and facilitators of access to ACF services among low-income AI/AN in urban areas; b) to learn how Urban Indian Centers are working to meet the needs of this population; and c) to assess the unmet service needs among low-income urban AI/AN and learn how ACF services might be able to meet these needs. Westat staff, on behalf of ACF, will conduct telephone interviews with two groups of individuals: Directors of 35 Urban Indian Centers (UICs) located in cities throughout the United States, and directors of local state agencies in the same locations as the selected UICs that administer ACF-funded services and supports. The study will collect information that will advance the field of knowledge about urban Indians and will identify ways in which ACF might modify its outreach and service delivery strategies to better meet the needs of this vulnerable population. This section provides an overview of the study and discusses its objectives and the need for the proposed information collection.

ACF supports a wide array of programs and services that are intended to help low-income families overcome a number of obstacles to achieve self-sufficiency. For example, Temporary Assistance for Needy Families, or TANF, is a program that provides cash assistance to families with dependent children and pregnant women to help them meet basic needs, such as the costs of housing, utilities, and clothing. Families may receive TANF assistance for a maximum of 60 months. In addition, federal assistance is available for very specific household expenses. For example, home energy costs are one expense that can take an enormous toll on the cash resources of low-income families. In an effort to maintain a tolerable living space, a family may use a large proportion of its monthly income to pay the energy bill; alternately, a family may try to conserve financial resources by turning down the thermostat in the winter. This latter strategy may free money for other expenses, but it does so at a potentially negative cost to the family, including compromising their health or creating an inhospitable environment for children to complete their schoolwork. To mitigate such scenarios, ACF sponsors the Low-Income Home Energy Assistance Program (LIHEAP), which helps low-income families pay their heating and cooling bills.

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<sup>1</sup> For a description of how this study relates to other ACF-funded Tribal research endeavors, please see Appendix A, *ACF Approach to Tribal Research*.

Despite the availability of these and other programs aimed at improving living conditions for low-income families, data indicate that urban American Indians and Alaska Natives continue to fare less well than their non-Native counterparts. For example, the poverty rate among urban AI/AN is 20.3 percent compared to a general urban poverty rate of 12.7 percent; urban AI/AN are 1.7 times more likely to be unemployed than the non-urban AI/AN population<sup>2</sup>; urban Indians are less likely to receive a high school diploma; and urban AI/AN are less likely to receive prenatal care and have higher rates of infant mortality than AI/AN women who are living on a reservation within the same state<sup>3</sup>. The current study is intended to improve our understanding of the unique challenges faced by this population, learn how UICs are helping this population, and determine if there are ways in which ACF could better meet their needs.

### **Legal or Administrative Requirements that Necessitate the Collection**

There are no legal or administrative requirements that necessitate the collection of these data. ACF is undertaking this study at the discretion of the agency in order to understand the extent to which this vulnerable population is using and benefitting from these services.

### **Study Objectives**

As noted above, the overall objectives of the study are to better understand the challenges faced by low-income urban AI/AN families, the ways in which Urban Indian Centers are able to address these barriers, and to identify ways in which ACF might modify its outreach and service delivery strategies to better meet the needs of this population.

Specific questions to be explored through this study are:

- What are the social service needs of Indians living in urban communities?
- What role do Urban Indian Organizations play in helping low-income urban Native families meet their social service needs?
- To what extent are urban Indian families accessing the programs and services offered by ACF?
- If urban Indian families are not engaged with ACF services, what are some of the barriers to access?
- What are some of the best state practices/policies for providing social services to urban Indian families? Are these practices/policies able to be replicated? Is there any targeted outreach to urban Indian families by the state agencies that provide social services?

Major study activities that are intended to help answer these questions include:

- A comprehensive review of the literature on urban American Indians/Alaska Natives (AI/AN), focusing in particular on the service and support needs of this population;
- A Technical Working Group that will assist in identifying research priorities for this study through at least one meeting. The initial meeting of the group took place on January 23-24, 2012;

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<sup>2</sup> Statistics from [www.nuifc.org](http://www.nuifc.org) - accessed 7.30.11

<sup>3</sup> Urban Indian Health Institute. (2009). *Visibility Through Data: Health Information for Urban American Indian and Alaska Native Communities*.

- A research study involving telephone interviews with Directors of 35 Urban Indian Centers around the United States and, in parallel, telephone interviews with directors of 35 local State agencies that administer ACF-funded services and supports; and
- Written materials summarizing the work, including timely memos of ongoing research activities, and a final comprehensive report that describes study methods, findings, and recommendations.

This OMB submission seeks clearance for the data collection activities that will be undertaken during the telephone interviews. .

## **A2. Purpose of Survey and Data Collection Procedures**

Although some research has been conducted with urban AI/AN previously (see Appendix B, *References*, for a partial list of relevant citations), to our knowledge no study has yet been conducted that has examined the extent to which this population uses services supported by the federal government or any perceived barriers to service use. The team consulted members of the Technical Working Group (TWG) to discuss the draft literature review and to obtain feedback from members about the original proposed study design. TWG members emphasized the relative lack of knowledge that exists about AI/ANs living in urban areas and suggested that before conducting proposed on-site visits the study team should conduct telephone interviews with the directors of a large number of Urban Indian Centers in order to provide ACF with an understanding of the diversity of contexts in which low-income urban AI/ANs live and are served..

We fully agreed with the rationale behind this recommendation and this information collection request includes telephone interviews with directors of 35 UICs. Upon further reflection, the research team determined that it would also be valuable if we conducted telephone interviews with directors of State agencies that administer ACF-funded services and supports in the same locales as the UICs. For example, to date we do not know the extent to which low-income urban AI/AN are accessing ACF-funded services; we also do not know how – or even if – these agencies endeavor to target the low-income urban AI/AN population. Telephone interviews with the UICs will help us understand the services those organizations are providing the urban AI/AN population, but we also need to speak with locally-based State services agencies if we are to understand fully the extent to which the urban AI/AN community interfaces with ACF-funded services.

Respondents will be asked to describe:

- The strengths of and challenges faced by the contemporary AI/AN community in the city,
- The resources their organizations offer to the community (e.g., nutrition support, behavioral health services, cultural programs),
- Other resources (e.g., agencies or organizations) in the community to which they may refer their clients,
- Barriers and facilitators to urban AI/AN accessing ACF services.
- Ways in which the respondents believe the AI/AN community might be served better by all of the city’s social service organizations.

Potential interviewees first will be sent a letter (see Appendix C, *Invitation Letter to UIC and Local State Agency Directors*) that informs them of the research objectives and the role of the telephone interviews in the overall study process. Included in the mailing will be an informed consent form (see

Appendix D *Informed Consent Form*) for potential respondents to review, sign, and return to Westat via fax or the self-addressed stamped envelope enclosed in the package. Recipients will be assured that their participation in the interview is voluntary, and they will be given all necessary details (including contact information for the Study Director) should they wish to opt out of the process at that time. Approximately 10 days after the invitation letters and informed consent forms have been mailed, a Westat staff member will contact each individual who has not opted out and will endeavor to schedule the interview. Participants will be told that the interview remains voluntary and that they can refuse to answer any questions with which they are not comfortable. Each interview (see Appendix E *Telephone Interview Guide for UIC Directors* and Appendix F *Telephone Interview Guide for Local State Agency Directors*) will take no more than one hour and, with the participant's permission will be audio-recorded to ensure analytic accuracy.

Interview data will provide ACF with a better understanding of the needs and challenges of the low-income urban AI/AN community, resources and services available to support this vulnerable community, as well as the way ACF services and programs are perceived by and, indeed, used by low-income urban AI/AN individuals and families. In addition, the information will help ACF consider how it might improve its outreach and service delivery efforts to better meet the needs of the population.

### **A3. Improved Information Technology to Reduce Burden**

The information will be collected through semi-structured discussions that are not conducive to information technology, such as computerized interviewing. With participants' permission, we will audio-record each discussion session. These audio files will provide the study team with a verbatim record of the discussion, thus allowing participants to speak freely and not have to wait for note-takers to "catch up" with the discussion.

### **A4. Efforts to Identify Duplication**

The data collection activities have been carefully reviewed to determine whether the needed information is already available. A comprehensive literature review has been conducted to assess what is currently known about the history of and challenges faced by urban AI/ANs, as well as ways in which ACF has attempted to meet their needs (e.g., through the implementation of Tribal TANF programs). However, our ultimate goal is to link these two areas – the urban AI/AN population and ACF services and programs – in order to improve the population's access to ACF services and programs. To our knowledge, no existing data sources can provide this information.

### **A5. Involvement of Small Organizations**

The study team does not anticipate contacting small businesses or organizations for data collection purposes.

## **A6. Consequences of Less Frequent Data Collection**

This study is being proposed as a one-time effort that will help to inform ACF's future research agenda with the urban AI/AN population. Not collecting the information will only limit the degree to which ACF is adequately able to address the needs of this vulnerable population going forward. ACF needs to understand the unique challenges facing this community, particularly with respect to service access, so that it can improve its outreach and service delivery to the population.

## **A7. Special Circumstances**

There are no special circumstances for the proposed data collection.

## **A8. Federal Register Notice and Consultation**

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13 and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on August 10, 2011, Volume 76, Number 154, pages 49491-49492, and provided a sixty-day period for public comment. A copy of this notice is attached as Appendix G, *60-Day Federal Register Notice*.

During the notice and comment period, the government received 5 comments (see Appendix H, *Summary of Public Comments and ACF Responses to 60 Day Federal Register Notice*). In addition to three of the commenters requesting copies of the draft discussion guide, two suggested that their cities be considered when selecting site visit locales. Another individual offered suggestions for the study design, in particular, recommendations for ensuring that the then-proposed site visits would be conducted in a culturally competent manner. Finally, a commenter from Anchorage, Alaska asked for an estimated timeframe when data collection would begin. All requests for the draft discussion guide were fulfilled; decisions regarding which cities to visit were made independently of the solicitations in the comments.

Staff with Westat, the contractor conducting this study on behalf of ACF, their consultant, Monica Tsethlikai and sub-contractor, SSI, Incorporated, have extensive experience working with American Indians/Alaska Natives and the social service issues (e.g., TANF, Head Start, physical and behavioral health challenges) that will be considered during this study. All have contributed to the development of the discussion guides. We have also taken into account the above-noted comment on cultural competency to ensure that we have adequately addressed that commentator's concerns.

In addition, this study is being supported by a Technical Working Group (TWG) comprised of individuals with expertise in both the history and social service needs of urban American Indians and Alaskan Natives (see list below). TWG members provided suggestions for study implementation (including recommendations for improvements to the interview guides, comments about the originally proposed sites for the on-site visits, etc.). Following the TWG meeting and upon receipt of additional comments from OMB, the site visits proposed in the original study have been dropped from the research design.

**Members of the Technical Working Group**  
***Urban Indians' Interactions with ACF Services and Programs***

<b>Name</b>	<b>Affiliation</b>
Jeremy Billy	United American Indian Involvement, Inc.
Janeen Comenote	Executive Director, Urban Indian Family Coalition
Mary Garcia	Executive Director, Albuquerque Indian Center
Jennifer Giroux	Indian Health Service (Physician, epidemiologist)
Gil Gonzalez	Director, Washoe Tribe Head Start
Frances Grumbly	Director, American Indian Community House, New York City, NY
John Jewett	Denver Indian Family Resource Center
Kassia M. Jourdain	Director of Operations, Native American Community Development Institute
Deborah Northburg	Cook Inlet Tribal Council (Director of Child and Family Services)
Joseph Podlasek	Executive, Director, American Indian Center of Chicago
Sheri Riemers	Director, Indian Child Welfare Program, Minneapolis American Indian Center
Robyn Sunday-Allen	CEO, Oklahoma City Indian Clinic

**A9. Payment of Respondents**

Individual respondents will not be paid for their participation. However, we will make a \$50 contribution to the general fund of each respondent's organization as a token of appreciation for allowing the staff member to participate in the study.

**A10. Confidentiality of Respondents**

All interviewees will be assured that the information they provide will not be released in a form that identifies them. As indicated in Section A2, participants will be asked to sign an informed consent form which will inform them about the purpose of the study and who the funding agency is. We will also stress that their participation is voluntary, the information they provide will be kept private to the extent permitted by law, and that identifying information will not be attached to any public reports or data supplied to the U.S. Department of Health and Human Services or any other researchers. The form will also describe the potential risks (low) and benefits (indirect, i.e., improve services for the urban AI/AN population more generally) to them, as well as provide them with contact information at ACF should they have questions about the study. All participants will receive a copy of the informed consent form for their own records.

**A11. Sensitive Questions**

There are no personally sensitive questions in this data collection.

**A12. Estimation of Information Collection Burden**

This proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses other than the time spent answering the questions contained in the various discussion guides.

Exhibit A12.1 summarizes the reporting burden on respondents to the two guides submitted for OMB clearance. The estimated response time of one hour for any interview is based on the research team’s experience with a) the type and amount of information being requested from any interviewee; and, more importantly, b) the time limits on concentration and attention from typical interviewees. The additional one-quarter hour is our estimate for the amount of time it will take the respondent to review and sign the informed consent form and return it Westat via SASE or fax. The annual burden is estimated from the total number of completed discussions and the minutes taken to complete the discussions. Thus, the total annual burden is expected to be 88 hours.

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**Exhibit A12.1**

**Data Collection Activities**

<b>Instrument</b>	<b>Annual Number of Respondents</b>	<b>Number of Responses Per Respondent</b>	<b>Average Burden Hours Per Response</b>	<b>Total Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Total Annual Cost</b>
<i>Initial Contact and Telephone Interview Guide for Directors of Urban Indian Centers</i>	35	1	1.25	44	\$20.76	\$908.25
<i>Initial Contact and Telephone Interview Guide for Directors of Local State Agencies</i>	35	1	1.25	44	\$20.76	\$908.25
<b>Annual Estimate:</b>				<b>88 hours</b>		<b>\$1816.50</b>

Interviewees will be directors of Urban Indian Centers and directors of local state agencies. To compute the total estimated annual cost, the total burden hours were multiplied by the mean hourly wage for “Community and Social Service Workers (21-0000)”, according to the Bureau of Labor Statistics, National Compensation Survey, 2010 (\$20.76/hour). The total estimated annual cost is \$1816.50.



### **A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

### **A14. Estimate of Cost to the Federal Government**

The information collection activity and associated forms have been developed by the study contractor, Westat, with input from ACF. The total cost to the government for data collection activities is \$97,899.

### **A15. Change in Burden**

This is a new data collection.

### **A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

#### **A16.1 Analysis Plan**

The data collected during the telephone interviews is intended to inform ACF's understanding of the unique challenges facing urban AI/AN and ways in which ACF might be able to modify its outreach and service delivery strategies to better meet the needs of this population. All interviews will be conducted by the senior project staff members. With respondents' permission, all interviews will be audio-recorded to facilitate analytic accuracy.

After each UIC director interview, study team members will review the audio recordings for interviewee comments that provide insights into the relationships between urban AI/ANs and various social service providers. Team members will pay particular attention to participants' experiences that may be actionable by ACF; for example, UIC directors in several cities indicate that they have never heard of a particular ACF-funded service and did not know it was available to them. In response, ACF may decide to employ a messaging campaign in those cities to improve the awareness of urban AI/AN about the range of services for which they may be eligible. Alternately, interviewees may talk about facing discrimination at particular social service agencies in their cities. ACF may determine that cultural competence training of these employees, coupled with clear reminders about the consequences of failing to abide by federal non-discrimination policies, might ameliorate the challenges previously faced in those locations by urban AI/ANs seeking services.

Westat will prepare a comprehensive report once all telephone interviews have been completed that outlines the service needs of urban AI/AN populations, the services and supports offered to the population by UICs, the barriers and facilitators for these individuals being able to access ACF-funded services, and respondent recommendations for how ACF may improve outreach and service delivery to this population.

**A16.2 Time Schedule and Publications**

This OMB submission seeks approval for data collection activities that will take place between November, 2012 and May, 2013. A comprehensive report from the telephone interviews will be prepared and submitted to ACF, which plans to post it on the ACF website. This is anticipated to be completed in August, 2013.

**A17. Reason(s) Not to Display OMB Expiration Date**

All instruments for the study will display the expiration date for OMB approval.

**A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.