

**OMB Information Collection Request**

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

**Supporting Statement B**

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Submitted By:  
Office of Planning, Research and Evaluation  
Administration for Children and Families  
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## Part B: Statistical Methods

This section provides supporting statements for each of the five points outlined in Part B of the OMB guidelines with respect to the proposed data collection activities for *Understanding Urban American Indians' and Alaska Natives' Interactions with ACF Services and Programs*, an exploratory study being undertaken for the Administration for Children and Families (ACF) by Westat. The aim of this exploratory study is to 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. The study is one of several Tribal studies funded by ACF (see Appendix A, *ACF Approach to Tribal Research*). Its aim is to collect information to 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.

### B1. Respondent Universe and Sampling Methods

Telephone interviews with two populations are proposed: Interviews will be conducted with directors of 35 Urban Indian Centers (UICs) throughout the country and directors of 35 local offices of state agencies that administer ACF-funded service and supports. The identification and selection of UICs for inclusion in this study will be a two-step process: First, most of these centers are not operating under a common organizational structure and thus no list currently exists that identifies the universe of such organizations. Using the Internet as our main search tool, we will look for those organizations that:

- Self-identify as concentrating on meeting the social service or healthcare needs Native Americans or Alaska Natives; and
- Are located in urbanized areas (population greater than 50,000) or urban “clusters” (population greater than 2,500, but less than 50,000) as defined by the Census Bureau<sup>1</sup>.

The initial list of UICs will be sent to the members of our Technical Working Group (TWG), a panel of experts in the area of urban American Indian/Alaska Native issues (see table in Section B5, below) for their review, comment, and recommendations. In particular, we will ask all TWG members to identify those organizations that they believe should be included in the interviews, and to provide their rationale for those decisions. The final 35 UICs will be selected on the basis of input from the TWG members and the both ACF and ANA, both of whom may identify select organizations that they believe are particularly important to the study (e.g., a UIC in an area of the country that otherwise is not represented by TWG member recommendations).

The 35 local government agency offices will be selected based on the locations of the UICs. Once the list of UICs is finalized, the team will reach out to Department of Public Welfare (or similar) offices that are located in the same cities as the UICs. Invitation letters will be sent to the director of the local office as well as the director of that office’s state agency. This will ensure that the local staff member has permission to proceed with the study interview. In cases where we do not have

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<sup>1</sup> <http://www.census.gov/geo/www/ua/urbanruralclass.html>

permission from the state director, the team will confer with ACF and ANA to identify an office in an alternate location that can still help to inform the study.

**Table 1 Respondent Types, Contact Modalities, and Estimated Number of Respondents**

	<b>Methods of Identification and Contact</b>	<b>Total Number of Individuals to be Interviewed by Telephone</b>
<b>Directors, Urban Indian Centers</b>	Develop list of UICs throughout the United States; request TWG assistance with identifying top candidate UICs. Collaborate with ACF and ANA, as appropriate, to complete the list of 35.	35
<b>Directors of Local State Agencies</b>	Identify offices that administer ACF-funded programs and services in the same cities as the selected UICs.	35

## **B2. Procedures for Collection of Information**

Directors of each agency or organization will receive a letter (see Appendix C, *Invitation Letter to UIC and Local State Agency Directors*) inviting them to participate in the telephone interview with Westat staff<sup>2</sup>. They will also receive an informed consent form (see Appendix D, *Informed Consent Form*) that they are to sign and return to Westat prior to commencement of the interview. Letter recipients, however, are under no obligation to participate and may opt out of the interview at any time. All telephone interviews will be conducted by Westat team members from approved locations, scheduled at times convenient for the respondent. We anticipate that all interviews will last no more than one hour.

Telephone interviews are anticipated to begin in January, 2012 and to be completed by the end of March, 2013.

## **B3. Methods to Maximize Response Rates and Deal with Non-response**

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<sup>2</sup> As noted in the preceding section, state agency directors also will receive a copy of the letter that is sent to the directors of the local offices so that they, too, understand the purpose of the study and provide their permission for the office director to participate in the interview.

We expect the level of cooperation with the study to be relatively high, with about 90 percent (31 out of 35 UICs; 31 out of 35 local government offices) of the program directors contacted by the study team participating in the proposed telephone interview. A couple of factors contribute to this optimistic prediction: First, the study is focused on barriers and facilitators to service use among a vulnerable population; because service providers are dedicated to seeing that their clients' needs are met, they are likely to be willing to discuss systemic challenges that keep their clients from maximizing their potential. Second, and with respect to the Urban Indian Centers, little is yet known about the services and supports these organizations are providing to low-income urban AI/AN. We believe directors of these centers will be vested in seeing that their efforts on the behalf of the urban AI/AN community are broadly recognized. Finally, because our questions aim to discover how a system of care is or is not meeting the needs of a particularly vulnerable population, they are not personally sensitive. Consequently, potential interviewees are unlikely to refuse to participate because of any perceived "sensitive" information being touched upon during the interviews. To help ensure high response rates 1) program directors will receive advance information about the study and interview through an invitation letter signed by Commissioner Sparks and Dr. Goldstein; 2) interviewers will be thoroughly trained in the protocol and objectives of the study, including methods to address objections or concerns; and 3) the study team will be highly flexible in scheduling interviews at the convenience of the program directors. For those UICs or offices that decline to participate, Westat will work with both ANA and OPRE to identify suitable substitutes. For example, we have identified a dozen UICs in California, and will initially select two or three of these to be interviewed. Should one of these UICs decline, we will review those remaining on the list and select a closely matching substitute (e.g., a UIC that is located in the same general geographic region or that offers similar services and programs).

While we expect to obtain a high level of responses, care will be taken in the analyses and reporting to acknowledge that the data are not representative of the universe of Urban Indian Centers, local governmental programs or the low-income AI/AN population. Although the information has limitations, information obtained from respondents will be a valuable contribution to knowledge about and potential responses to challenges faced by service providers and individuals and families.

#### **B4. Tests of Procedures or Methods to be Undertaken**

The interview guides have not been tested prior to this submission, although team members have collaborated to ensure that these guides cover the main topics of interest to the study. The study team has also received feedback on these guides from members of the study's Technical Working Group, a panel of experts in the area of urban American Indian/Alaska Native issues (see table in Section B5, below). Importantly, for this study the guides are not intended to serve as verbatim survey instruments – our experience has demonstrated that interviewees may need questions reworded slightly in order to provide a relevant answer; in addition, and quite common to qualitative research, participants may introduce new topics to the discussion that are relevant, but that the study team had not anticipated prior to going on site. The interview guides thus provide a basic structure for team members to follow, but interviewers may use non-standard follow-up questions, as permitted by 44 USC, 5 CFR Ch. 11 (1-1-99 Edition), 1320.3.h: Definitions, *Information*.

## B5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

The information for this study is being collected by Westat, a research consulting firm, and its subcontractors, on behalf of the US Department of Health and Human Services (HHS). With HHS oversight, Westat is responsible for the study design, data collection, analysis, and report preparation. Key input to the design was received from the following individuals:

### ***Westat Team***

Cynthia Helba, Corporate Monitor, Westat  
 Cynthia Robins, Project Director, Westat  
 Monica Tsethlikai, Independent Consultant  
 Walter Hillabrant, Consultant, SSI, Incorporated

### ***Department of Health and Human Services***

Anne Bergan, Interim Project Officer, Office of Planning, Research, and Evaluation  
 Naomi Goldstein, Director, Office of Planning, Research, and Evaluation  
 Lori King, Project Manager, Administration for Native Americans  
 Lillian Sparks, Commissioner, Administration for Native Americans

***Table 2 Members of the Technical Working Group***

<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
Sarah Kastelic	National Indian Child Welfare Association (Chief of Staff)
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

The HHS project officer, Anne Bergan, has overseen the design process and can be contacted at:

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