

STRUCTURE

Alaska Native and American Indian Interoperability in Action

Cook Inlet Tribal Council relies on the 477 program to ensure the best possible benefits for those seeking education and employment in the Anchorage area. Challenges abound, but the potential for success is infinite.

By Lisa Rieger

BY THE TIME SANDRA, an Alaska Native single mother, enters the 477 Tribal TANF program at Cook Inlet Tribal Council, she is at her wits' end. She is living with her two children, 8 and 10, in unstable housing, has no job skills and suffers from addiction issues. However, once she arrives at 477 Tribal TANF, she encounters a virtually seamless, easily accessible service delivery system that encompasses rental housing assistance, childcare, job training and education, job search and substance abuse support, in addition to temporary wage assistance. What's more, she doesn't have to fill out countless applications—one form is adapted to several services to minimize wait time, so she is able to begin CITC's retail training program even as she waits for temporary financial assistance to begin. Sandra receives childcare and bus passes to allow her time and transportation to attend the career training program, as well as access to a priority substance abuse assessment. Thanks to the CITC's employment search assistance, she may land a job before her TANF benefits kick in. Meanwhile, she gets the opportunity to work with staff members who, like her, have ties to a village in rural Alaska and can relate to her in various ways, so she feels comfortable accepting their help. She and her children begin to thrive.

Above is a typical scenario at CITC, a non-profit tribal organization that serves as the primary education and workforce development center for Native people in the Anchorage area. Through a coordinated interdepartmental effort and continuous refinement of its programs and case management practices, CITC has put the key elements of interoperability to work for Alaska Native and American Indian people.

Interoperability comes naturally for Alaska Native and American Indian people, as it is consistent with their holistic, integrated ways of life. For more than two decades, tribes, tribal organizations and the federal government have been working together to improve the provision of client-focused services by combining funding silos via a little known yet highly

successful federal program known as "477."

Public Law 102-477 created the 477 program in 1992 as a demonstration project to allow tribes to exercise their governmental authority to "integrate the employment, training and related services they provide in order to improve the effectiveness of those services, reduce joblessness in Indian communities and serve tribally determined goals consistent with the policy of self-determination" [25 U.S.C. §3401]. Administered by the Office of Indian Energy and Economic Development at the Department of the Interior (DOI), the 477 program provides a critical foundation for maximizing the effectiveness of programs serving Native people. The law allows the consolidation of funding streams from the DOI, Department of Health and Human Services

and Department of Labor into an integrated employment, supportive services and training program with a single budget and single reporting system. In short, it increases cooperation among agencies, reduces administrative burden and maximizes federal dollars where they are most needed.

Since its inception, tribes and tribal organizations working under the 477 program have successfully combined programmatic funding for Temporary Assistance for Needy Families (TANF), job training, job placement, childcare and related funding, while coordinating accounting and reporting mechanisms. The streamlined funding for 477 plans, through the contracting provisions of the Indian Self-Determination Act, has been essential to the success of 477. This flexibility facilitates the creation of culturally appropriate programs and releases program funding for direct client services by eliminating administrative redundancy, while still adhering to the Government Performance Results Act's accountability standards. This combination of flexibility and strict accountability has also led to improved client services, better usage of program staff, use of a single intake system, more uniform treatment of clients, significant reduction in administrative

burden, use of a single budget and improved cash flow.

However, one of the most significant outcomes of the 477 program is increased self-determination for participants as well as for tribes and tribal organizations. In contrast to many federal tribal programs that are based on an assumption of tribal dependence and incapacity, 477 puts tribes and tribal organizations in direct control of all aspects of their employment programs serving their own people. This ensures services are provided to clientele in a manner that is respectful, culturally sensitive and best-fitting the needs of the community.

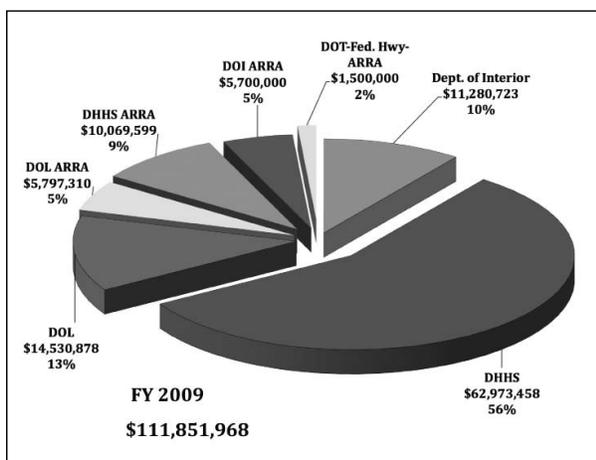
The success and importance of the 477 program to participating tribes and tribal organizations cannot be overstated. In 2004, the Office of Management and Budget gave 477 the highest PART (Program Assessment Rating Tool) rating of any program administered in DOI Indian Affairs. During the past fiscal year, 264 tribes and tribal organizations operated 62 separate 477 plans. In FY09, nearly \$112 million was funded to tribes and tribal organizations implementing 477 plans.

Overcoming Obstacles, Recognizing Potential

In recent years, tribes have had to fight the "re-silo-ization" of the program as federal agencies have demonstrated difficulty sharing responsibility for monitoring programs. As a result, program growth has been limited, and the true capacity of 477 has yet to be realized.

Despite the obstacles, however, the 62 different 477 programs run by tribes and tribal organizations across the country that are currently in operation provide a wide range of viable case studies of interoperability. For example:

- » The TANF program implemented by the Sisseton Wahpeton Sioux Tribe has reduced the rate of welfare recipients who return to welfare during a 12-month



Funding stats: PL 102-477 national tribal funding and federal agency sources (Source: DOI)

period from over 30 percent in Fiscal Year 2001 to 6 percent in Fiscal Year 2006. The tribe attributes this success largely to its PL 102-477 requirement that all welfare cash assistance recipients attend the tribe's Professional Empowerment Program.

- » The Citizen Potawatomi Nation has leveraged its 477 dollars to create employment and training opportunities through tribal economic development. For instance, it owns a warehouse grocery store and, through 477, is able to provide its members with training opportunities that can result in lifelong careers.

Development of a 477 plan by a tribe entails:

- » Identifying tribal employment and training goals
- » Identifying programs to be integrated into the plan
- » Explaining the delivery and integration of services to tribal members
- » Identifying expected results, statutes, regulations and procedures that may need to be waived by a federal department for successful execution
- » Approval by the tribal government.

Tribes integrate program requirements imposed by law or regulation into the proposed 477 plans, and approval of such plans by the DOI, in consultation with the other agencies, depends on this inclusion.

The 477 program provides a successful federal structure to de-silo funding and programs and maximize efficiencies in accounting, reporting and provision of services. Combining funding sources from different agencies into a cohesive program can conflict with individual program and agency guidelines for accountability. However, reduced accountability is not a necessary result. As the

477 program has demonstrated, with sufficient oversight and technical assistance, program goals exceed expectations and achieve client-focused results, and self-determination for agency and client alike, without sacrificing individual program integrity.

CITC's programs serve the Cook Inlet Region, which has an Alaska Native/American Indian population of more than 40,000, or approximately 40 percent of the Native population of the state of Alaska. These programs address many of the myriad social, economic and educational challenges faced by Alaska Native people. For example, Alaska Native students are twice as likely to drop out of school as their non-Native peers, 33 percent of Alaska's unemployed are Alaska Native people, and almost 20 percent of Alaska Native people have incomes below the federal poverty line—nearly three times the rate of non-Natives. CITC is the sole provider of TANF and Bureau of Indian Affairs Welfare Assistance for Alaska Native/American Indian families in Anchorage.

CITC's mission is to build human capacity by partnering with individuals to establish and achieve both educational and employment goals that result in lasting, positive change for themselves, their families and their communities. CITC began its 477 program 18 years ago, developing synergies between job training and education, childcare and temporary wage assistance over the years. At CITC, the more recent steps to interoperability included process mapping to standardize intakes and consolidate departmental information needs into one release-of-information form. This organizationwide release was necessary due to the restrictions of FERPA, HIPAA and 42 CFR-2. While essential for protection of personal information, these laws and regulations create significant barriers to information sharing across departments and sometimes do not serve our participants well. Integrated case management by teams comprised of case-workers from each department—Recovery



Services, Employment and Training Services, Education, and Child and Family Services—ultimately provides the wraparound services leading to greatest participant success. (For more on information sharing and confidentiality regulations, see page 37.)

Thanks to 477, which is consistent with CITC's values and has been essential to CITC's success, CITC has been able to leverage its funding to increase effectiveness and innovation. CITC's employment and training programs are based on the premise that effective solutions to workforce development require integrated approaches to ensuring job readiness, training and placement.

CITC's programs involve active cooperation among schools, social services agencies, job trainers, state and federal agencies, Native and non-Native for-profit employers, and CITC-owned microenterprises—all of which create opportunity for participants. CITC has been able to put more than 1,200 people to work each year and effectively reinvest TANF savings in its programs. From 2004 through 2008, CITC's employment and training programs served 17,345 Natives with career counseling and job placement services, emergency financial assistance, case management, crisis intervention and training information to move participants into employment and toward self-sufficiency.

CITC has effectively transformed TANF and welfare assistance from the conventional entitlement-based programs to programs that enhance self-determination and accountability for the organization and our participants.

The 477 version of interoperability offers one plan, one program and one report for education and employment, all carefully designed to meet both client needs and federal funding guidelines. When a client enters CITC's doors, he or she signs up for TANF and job readiness simultaneously. Coordination of case management (TANF, job readiness and childcare assistance) allows

for maximum accountability at both the participant and program levels. There is no duplication of services because all the service providers are aware of each other's roles and contributions. The familial nature of many relationships in the Native community lends itself to a comprehensive and holistic approach to such services. In addition, developing and maintaining good relationships with state and municipal providers assists in the seamless provision of services.

Interoperability is more than colocation and integrated funding. For tribes and tribal organizations, treating the person and family as a whole is the key to helping ourselves and our clients make the shift from entitlement to accountability and dependence to self-determination. Having and using the freedom to be creative and accountable constitutes a shift at the macro level from dependence to independence, as important to the tribes as to the individuals served. The partnership between agency and tribe, tribe and individual, leads to fulfilling unlimited potential.

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