

Feasibility of Tribal Administration Of Federal Nutrition Assistance Programs

May 19, 2016

Presentation Outline

- Background
- Research Design and Methodology
- Research Limitations
- Research Findings
- Discussion

Background - Legislation

Section 4004 of the Agricultural Act of 2014 (P.L. 113-79) authorized this study to:

“determine the feasibility of the Tribal administration of Federal food assistance programs, services, functions, and activities (or portions thereof) in lieu of State Agencies or other administering entities.”

Background – Research Objectives

Objective 1: Identify services, functions, and activities associated with administering nutrition assistance programs, in whole or in part

Objective 2: Consult with ITOs to determine their interest in administering the programs

Objective 3: Understand the readiness of ITOs to administer these programs

Objective 4: Identify statutory or regulatory changes, waivers, or special provisions that would be needed for ITOs to administer each nutrition program, in whole or in part

Study Design and Methodology

Multi-method approach guided by Tribally Driven Participatory Research principles

- Document review and interviews
- Tribal consultations and outreach
- Survey sent to all Tribes
- Site visits to some Tribes

Research Design and Methodology: Administrative Requirements

- Document reviews and interviews with FNS national and regional staff
- Summarized:
 - Organizational structure
 - Administration at Federal, State and local levels
 - Key legislative requirements
- Primary focus on SNAP, School Lunch, School Breakfast, and Summer Food Service Program
 - Also outlined WIC, CACFP, FDPIR, and TEFAP requirements

Research Design and Methodology: Tribal Outreach and Consultations

- Consulted and conducted outreach with Tribes in summer and early fall of 2014
- Completed 3 teleconference consultations
- Held discussions with Procurement Technical Assistance Centers leadership
- Operated booths at two national conferences

Research Design and Methodology: Survey

- Developed collaboratively with FNS and Tribal stakeholders
- Web and paper survey sent to 566 Federally recognized Tribes
- Fielded 20 weeks; 116 Tribes responded

Research Design and Methodology: Site Visits

- Protocol developed collaboratively with FNS and Tribal stakeholders
- 13 site visits between April and August 2015; 16 Federally recognized Tribes including 3 Alaska Native Villages
- Interviewed Tribal leaders and program managers

Research Limitations

- Abbreviated research timeline:
 - Limited our focus to four key programs
 - Limited our ability to conduct formal consultations
 - Did not permit much notice for scheduling site visits

Research Findings

- Tribal Characteristics
- Tribal Interest
- Tribal Experience
- Key Challenges

Findings: Size of Tribes Participating in the Study

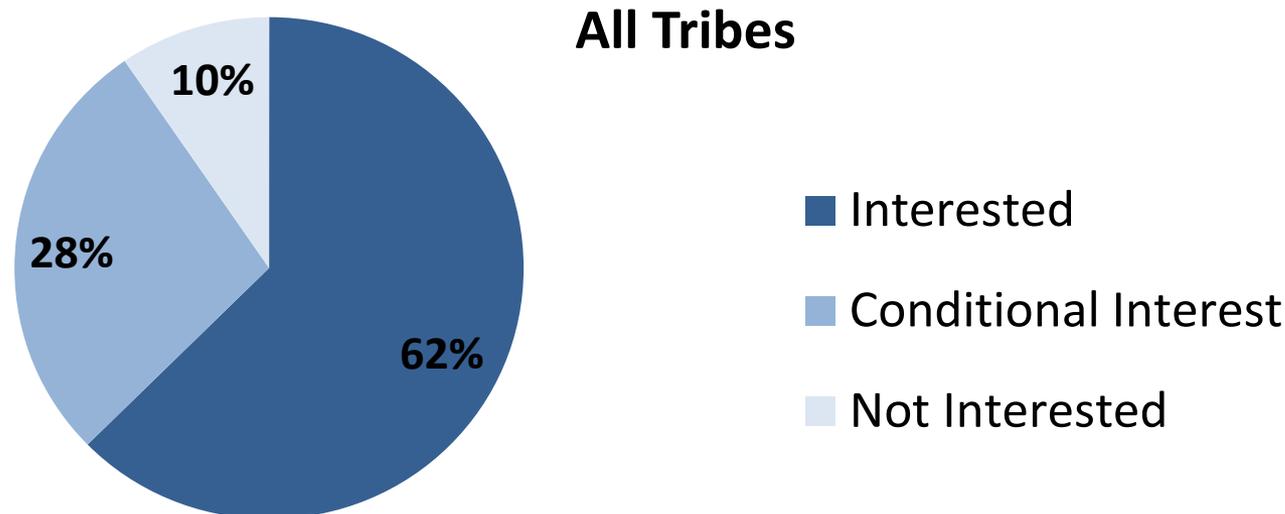
Size (Members)	Survey Respondents		Site Visit Tribes	
	Number	Percent	Number	Percent
Small (<1,000)	65	56.0%	8	50.0%
Medium (1,000-4,999)	37	31.9%	5	31.3%
Large (5,000+)	14	12.1%	3	18.8%
Total	116	100%	16	100%

Findings: Tribal Experience Running Nutrition Programs

Nutrition Program	Tribes Responding to Survey				
	Small	Medium	Large	All Tribes	
				No.	%
Elderly Nutrition Program	24.6%	70.3%	85.7%	54	46.6%
FDPIR	16.9%	40.5%	71.4%	36	31.0%
Summer Food Service Program	15.4%	29.7%	50.0%	28	24.1%
WIC	4.6%	32.4%	64.3%	24	20.7%
Child and Adult Care Food Program	10.8%	29.7%	35.7%	23	19.8%

Findings: Tribal Interest

- Tribes reported interest in and benefits to administering nutrition assistance programs
- Tribes expressed that Tribal administration of nutrition programs represented further recognition of Tribal sovereignty



Findings: Tribal Interest by Program

	Tribes Expressing Interest on Survey				
Program	Small (%)	Medium (%)	Large (%)	All Tribes	
				Number	Percent
SFSP	69.7%	71.4%	54.6%	49	68.1%
SNAP	36.4%	60.7%	63.6%	36	50.0%
School Lunch and Breakfast	36.4%	32.1%	27.3%	24	33.3%
Other	54.6%	64.3%	72.7%	44	61.1%

Findings: Tribal Experience

- Tribes have relevant experience operating Federal, State, and Tribal programs, for example:
 - Financial and auditing governance policies
 - Program activities like determining eligibility, program outreach, managing caseloads
- Tribes indicated that they have sufficient resources to operate their current programs

Findings: Tribal Experience

- Experience with program activities varies by Tribe size

Program Activities	Tribes Reporting That They Provide Program Activities				
	Small	Medium	Large	All Tribes	
				No.	%
Deliver actual services	50.0%	88.2%	92.3%	58	73.4%
Produce reports to a State or Federal agency	50.0%	85.3%	100%	58	73.4%
Determine participant eligibility	46.9%	82.4%	100%	56	70.9%
Conduct outreach	37.5%	88.2%	100%	55	69.6%
Manage caseloads	31.3%	73.5%	84.6%	46	58.2%

Findings: Workforce and Operations

- Generally, survey and site visit data show that Tribes are adequately staffed to operate current programs
- Tribes reported low staff turnover rates
- Two-thirds of Tribes collect data on employee performance
- Hiring merit-based staff for SNAP certification was a key legislative challenge

Findings: Infrastructure

- In general, Tribes reported adequate physical and technical infrastructure for current programs
- 44 percent use a competitive bidding process for IT services
- Tribes reported the need to expand infrastructure to accommodate new services
- Tribes reported challenges connecting to State data systems

Findings: Key Challenges Anticipated by Tribes

Expected Challenges	Small (%)	Medium (%)	Large (%)	All Tribes	
				Number	Percent
Lack of Financial Resources	47.6%	45.7%	23.1%	51	44.0%
Insufficient Technological Infrastructure	33.3%	31.4%	0%	32	27.6%
Insufficient Physical Infrastructure	31.8%	28.6%	15.4%	34	29.3%

Findings: Recommendations from Tribes

- Congress amend the Indian Self Determination and Education Act to include nutrition assistance programs
- Assist Tribes to obtain competitive pricing for WIC and SNAP EBT
- Create a regional office structure that more closely aligns with the distribution of Tribes nationally

Discussion and Questions?