



EMPOWERING TRIBAL WORKFORCE DEVELOPMENT

Version 2.0



Indian Country's Policy Recommendations
for the Federal Government

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PHOTO CREDITS

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National
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EMPOWERING TRIBAL WORKFORCE DEVELOPMENT

INDIAN COUNTRY'S POLICY RECOMMENDATIONS FOR THE FEDERAL GOVERNMENT

Compiled and presented by the National Congress of American Indians

*“Flexibility works – enabling tribes to do what we’re good at doing.
We know our problems intimately. We also know the solutions.”*

– Cynthia Lindquist, President, Cankdeska Cikana Community College¹

This brief presents a categorized list of key policy recommendations for the federal government to consider and adopt as it supports tribal nations, Native organizations, and tribal colleges and universities (TCUs) in their design, refinement, and strengthening of their workforce development efforts. It is not an exhaustive list; rather, it features Indian Country’s primary recommendations for actions that the federal government can and should take to empower tribal workforce development.²

NCAI compiled these recommendations over the past three years through: its [research project](#) documenting innovative tribal approaches to workforce development; interviews and surveys it conducted with tribal leaders and workforce development practitioners; a series of tribal workforce development sessions it convened at its conferences; ongoing consultation with its TANF (Temporary Assistance for Needy Families) Task Force and Economic Development, Finance, and Employment Subcommittee; and its ongoing partnerships with the Department of Labor’s Native American Employment and Training Council, the Public Law 102-477 Tribal Workgroup, and the National Indian and Native American Employment and Training Conference.

Tribal Self-Governance and Innovation: The Springboard for Workforce Development Success

Three decades of research by NCAI and others confirms that tribal self-determination/self-governance is the *only* policy that has ever worked in improving Native people’s lives and the quality of life in tribal communities. Nowhere does this finding ring more true than with workforce development. Ultimately, achieving workforce development “success” depends on what *tribal nations do*. Across the country, tribal governments, Native organizations, and tribal colleges and universities are crafting customized solutions to their particular workforce development challenges that: (1) transform the lives of Native people in search of employment and the education, skills, and experience necessary to build rewarding careers; and (2) strengthen tribal nations, governments, and communities in the process. Along the way, they are discarding or modifying one-size-fits-all approaches that may work for governments elsewhere and that offer the bureaucratic path of least resistance for the federal government.

The federal government’s job, then, is to foster a positive environment for *tribal* workforce development by removing the obstacles that obstruct tribal innovation. To accomplish this, the federal government should endow its systems, processes, programs, and funding protocols with the ease and flexibility that tribal nations and communities need to build their human capacity in accordance with their cultural values and community and economic development goals. Public Law 102-477, Public Law 115-93, and Workforce Innovation and Opportunity Act (WIOA) Section 166 represent positive milestones in this regard, but the federal government must fully commit to these advancements, as well as provide tribal nations with adequate financial resources, training, technical assistance, and the freedom to innovate so they can succeed on their own terms.

The Federal Government's Obligations to Tribal Nations

Through treaties between tribal nations and the federal government, a trust responsibility was established in which the federal government “charged itself with moral obligations of the highest responsibility and trust” and is “judged by the most exacting fiduciary standards” in its dealings with tribal nations.³ By virtue of this special trust responsibility, the federal government has a duty to ensure that its workforce development and related programs that serve Native people are: (1) properly administered and supported, and (2) adequately and consistently funded. Notably, the stated purposes of the Indian Self-Determination and Education Assistance Act include providing “for full participation of Indian tribes in programs and services conducted by the Federal Government for Indians and to encourage the development of human resources of the Indian people.”⁴

The seminal Public Law 102-477, which established “477” as a demonstration program in 1992, sought to put tribal nations in the driver’s seat of workforce development. Among 477’s stated purposes is to “serve tribally-determined goals consistent with the policy of [tribal] self-determination.”⁵ Eight years later, in legislation refining the 1992 law, Congress confirmed that 477 participants had:

- “(A) improved the effectiveness of employment-related services provided by those tribes and organizations to their members;
- (B) enabled more Indian and Alaska Native people to prepare for and secure employment;
- (C) assisted in transitioning tribal members from welfare to work; [and]
- (D) otherwise demonstrated the value of integrating employment, training, education and related services.”⁶

Placing tribal self-determination at the heart of tribal workforce development was firmly codified and an entrenched practice when Congress passed the Workforce Innovation and Opportunity Act (WIOA) in 2014. In the Act, Congress asserted – as it had repeatedly done in prior legislation dating back to 1973 – that among the purposes of the Section 166 programs “is to support employment and training activities for Indian, Alaska Native, and Native Hawaiian individuals in order to...promote the economic and social development of Indian, Alaska Native, and Native Hawaiian communities in accordance with the goals and values of such communities.”⁷ The Native programs are the only ones authorized under WIOA with such a statutory purpose.

The Act also specifies that all programs administered under Section 166 “shall be administered in a manner consistent with the principles of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450 et seq.) and the government-to-government relationship between the Federal Government and Indian tribal governments.”⁸

The consultation obligation also is formally recognized by the executive branch of the federal government. Specifically, the stated purpose of Executive Order 13175 is “to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes.” To accomplish this goal, federal agencies must “have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications.”⁹

The Benefits of Tribal Self-Determination in Workforce Development

Robust fiscal and programmatic support of workforce development approaches designed and driven by tribal nations and organizations (i.e., self-determination) is not only a legal and moral obligation that the federal government is duty bound to fulfill, but it is smart policy that provides a strong return on investment in various ways. Consider, for example:

- Sixty-six contractors and compactors, representing at least 225 tribal nations and Native organizations, are

successfully deploying the Public Law 102-477 (“477”) program in their holistic administration of tribal employment, training, education, welfare reform, and related programs, tailored to the unique needs and circumstances of those they serve.¹⁰

- The Office of Management and Budget consistently gives the 477 program one of the highest Program Assessment Rating Tool (PART) ratings among programs under the Department of the Interior-Indian Affairs.¹¹
- In 2019, the U.S. General Accountability Office reported that “Agencies with E&T programs targeted toward Native Americans reported that tribes’ use of authorized plans to integrate employment, training, and related services programs can help manage fragmentation and overlap...With an authorized plan in place, tribes can integrate certain federal funds received by the tribe and coordinate employment, training, and related services across multiple programs that serve the tribe.”¹²
- In FY 2018, among the more than 36,000 Native adults and youth served by 477 programs, 80.7 percent of those who listed Employment or Education as a goal achieved their goals; meanwhile, adult 477 program participants generated an average increase of \$8.25 in their hourly wages.¹³
- 170 tribal nations and organizations currently participate in the WIOA Section 166 program through the Department of Labor (DOL), providing workforce development services to more than 22,000 Native adults and youth.¹⁴
- For the 2018 Program Year, DOL reported that WIOA Section 166 grantees collectively generated a 64.3 percent entered employment rate and 79.2 percent employment retention rate across all of the Native adult and youth clients that they serve.¹⁵

The proof also can be found at the tribal level. Take, for example:

- The Blackfeet Nation’s workforce development arm, Blackfeet Manpower became the country’s first certified Native American One-Stop Center in 2007. Serving 2,200 welfare recipients, Blackfeet Manpower offers “a comprehensive set of services under one roof,” collating, analyzing, and sharing data so its component programs know how individual clients are doing, how well those programs are performing, and how they can perform better.¹⁶
- Recognizing many non-traditional students struggled with career advancement, the Chickasaw Nation established the School-to-Work Program to provide access to higher education and valuable on-the-job experience, seeking to create “a nation of educated and highly trained professionals who can meet the demands of today’s workforce.” Of the program’s 212 successful participants as of 2018, 89 percent had secured full-time employment, and 68 percent worked for the Nation.¹⁷
- Through 477, Cook Inlet Tribal Council merged its job- and career-readiness programs with Child Care, Community Services Block Grant, General Assistance, TANF, and related programs into a unified approach that meets “people where they are and help them help themselves to achieve their endless potential.” In a recent five-year period, this approach has helped 2,000 participants transition from welfare to employment and produced an average increase of \$7.81 in their hourly wages.¹⁸
- Concerned the State of Oklahoma was not adequately preparing its people who were leaving prison for life after incarceration, the Muscogee (Creek) Nation established the Reintegration Program (RIP). Believing all participants are capable of becoming positive, productive citizens, RIP provides a holistic array of culturally based support services before, during, and after their re-entry into society, which has sparked a drop in recidivism from 30 percent to 10 percent.¹⁹
- In 2014, Owens Valley Career Development Center (OVCDC) was struggling to get Tribal TANF clients to meet their mandatory work participation rates. In response, OVCDC staff created a strategic plan that prioritizes participant self-sufficiency, which produced a 16 percent decline in the Center’s cash assistance caseload over a recent three-year period, with caseload closures due to employment and/or excess earnings increasing 15 percent over the same period.²⁰

URGENT POLICY RECOMMENDATIONS



LEGISLATIVE

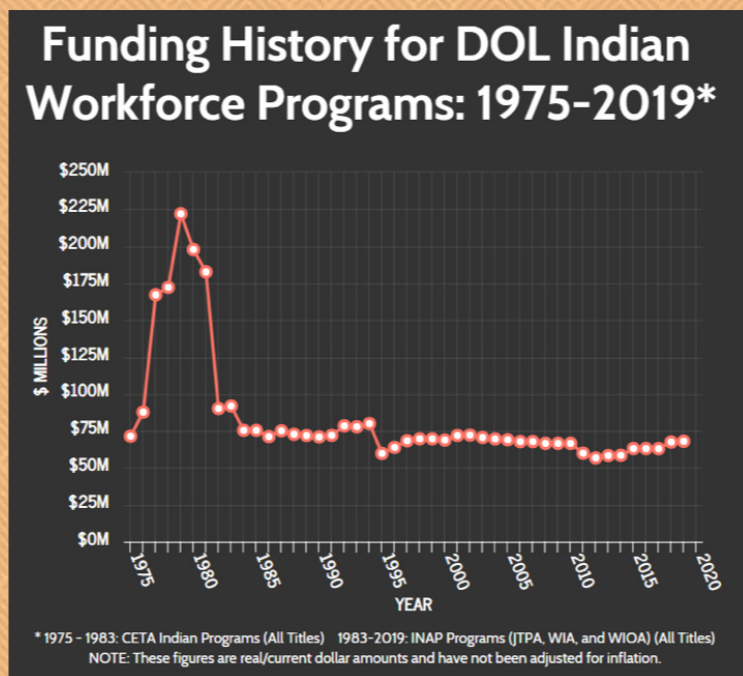
- **Drastically Increase Funding for Tribal Workforce Development in the FY 2021 Federal Budget and Beyond:** Federal funding for the Comprehensive Services Program (CSP) and the Supplemental Youth Services Program (SYS) under Section 166 has utterly failed to keep pace with the increase in the Native population needing these services and the rising costs of education, training, and related services. Since its peak of \$225 million in 1979, federal funding has experienced a precipitous decline to just under \$68 million today (see figure below), even though tribal communities still contend with the most acute and persistent workforce disadvantages of any population in the country.

This decline has come despite the fact the Native population is among the fastest growing in the country, increasing by 30 percent between 2000 and 2017 (compared to 15.7 percent for the overall U.S. population). In addition, Native people's need for training and employment services still far exceeds that of the general population. In 2017, Census data showed a 6.6 percent unemployment rate for the U.S. population overall. In stark contrast, the American Indian and Alaska Native (AI/AN) (single race) population's national unemployment rate was twice as high (12.3 percent), and three times as high (19.6 percent) on tribal lands.²¹ These staggering unemployment rates stem in part from a lack of educational opportunities, evidenced by a college degree attainment rate for the AI/AN population of 14.3 percent nationally (compared to 30.9 percent for the overall U.S. population).²²

Moreover, the costs of education, workforce training, and related services have increased dramatically over the past 15 years. For example, tuition, fees, room, and board have increased by 43.7 percent at two-year higher education institutions, and more than 56.6 percent at four-year institutions (see Appendix A for details).

Given these dynamics, it is imperative that Congress approves (and the Administration supports) significantly increased annual appropriations for tribal workforce development – notably the WIOA Section 166 Program – commensurate with the rapidly growing size of the service population and the rapidly increasing costs of workforce development-related services such as tuition for post-secondary educational institutions.

- **Prevent the Abolishment of WIOA Section 166 Programs or Their Transfer to the State Adult Formula Grant Program:** As part of its renewed commitment to *fully* fund tribal workforce development, Congress must rebuff [unjustified attempts](#) by the Administration or individual members of Congress to transfer WIOA Section 166 programs to the State Adult formula grant program, which would amount to an effective decrease of nearly \$50 million in the already inadequate level of funding support for tribal populations served by 166 grantees.²³ The consequences of eliminating this dedicated funding stream for Indian and Native American Programs under WIOA would be immediate and severe – including increased crime, drop-out, and unemployment rates – and would threaten long-term sustainable employment opportunities, economic growth, and community stability for



Section 166-reliant tribal populations. Congress also must reject the President's recent proposal to eliminate the Department of Labor's Division of Indian and Native American Programs altogether (which provided no facts to justify his position), as this would violate the federal government's trust responsibility to – and obligation to consult with – tribal nations.

- **Continue Congressional Oversight to Ensure Federal Agencies' Proper Implementation of 2017 Workforce Development Law (P.L. 115-93)**: The Senate Committee on Indian Affairs (SCIA) held its [first hearing](#) on this subject in November 2019. SCIA and the House Subcommittee for Indigenous Peoples should continue to exercise their oversight authority to ensure that the federal agencies legally mandated to follow the 2017 Indian Employment, Training and Related Services Consolidation Act promptly initiate and swiftly complete a process to adopt key technical amendments (see below) to the inter-agency MOA governing the Act's implementation.
- **Pass the Native American Business Incubators Program Act (116th Congress – S. 294)**: Congress should pass the Native American Business Incubators Program Act, which establishes a grant program in the Department of the Interior's Office of Indian Energy and Economic Development to create sustainable business incubators that provide collaborative workspace, skills training, and support resources for Native entrepreneurs seeking to developing businesses in Indian Country. The Act also leverages existing resources by requiring interagency coordination and partnerships between business incubators and academic institutions.
- **Pass the Creating Pathways for Youth Employment Act (116th Congress – S. 1551)**: This legislation will provide funding for states, tribal nations, and tribal organizations to create summer youth employment programs and subsidize year-round youth employment opportunities, which is sorely needed in tribal communities across the country.
- **Pass the Tribal TANF Fairness Act of 2019 (116th Congress – H.R. 2128)**: H.R. 2128 amends Part A of Title IV of the Social Security Act to clarify that a tribal government (including a tribal government participating in an intertribal consortium) may lease land held in trust or in fee, at a fair market rate, for the administration of a tribal family assistance grant. It also should increase annual funding for Tribal TANF programs commensurate with the rate of inflation to ensure that the program's actual value does not decrease each year.



ADMINISTRATIVE

- **Adopt Technical Amendments to the Inter-Agency MOA Governing the 2017 Workforce Development Law (P.L. 115-93) Immediately**: Adopt all amendments proposed by the 477 Tribal Workgroup to the MOA governing federal agencies' implementation of the Indian Employment, Training, and Related Services Consolidation Act, including:
 - (1) **striking language that impermissibly limits the Act's scope,**
 - (2) **changing language that unlawfully cedes DOI Secretarial decision-making authority to other agencies,**
 - (3) **removing the provision that unlawfully limits the MOA's applicability to only certain competitive grant programs,**
 - (4) **striking provisions that encourage delays in reviewing 477 Plans, and**
 - (5) **explicitly declaring that waiver requests may only be denied if they are inconsistent with either the Act or the authorizing statute of the specific program.**

These amendments will help to compel compliance with the law's provision giving tribal nations – *not* the administering federal agency – the right to determine which programs they wish to include in their individual 477 plans.²⁴ For a detailed explanation of the current MOA's fundamental flaws and the technical amendments needed to fix them, click [here](#).

- **Fully Empower the Department of Labor’s (DOL) Native American Employment and Training Council (NAETC):** The NAETC is the WIOA-authorized vehicle to guide the operation and administration of WIOA Section 166 Indian and Native American Employment and Training programs. Under past Administrations, the NAETC has actively advised the Secretary of Labor on how these programs can be managed and supported most effectively. The current Administration, however, has failed to ensure the NAETC’s ongoing functioning or heed its advice.²⁵ To fully empower the NAETC, DOL must:
 - (1) **recommit to holding regular NAETC meetings** (at least twice per year, *as required by law*) so the Council can carry out its important work in a sustained fashion;
 - (2) **actively consult with the NAETC on an ongoing basis and heed NAETC’s advice** regarding the consensus priorities of Section 166 grantees for appropriate program administration; and
 - (3) **ensure the NAETC includes tribal leaders** who can provide critical perspectives on the integral relationship between tribal workforce development programs and other key components of tribal governance.

- **Significantly Increase the Staff of the Department of Labor’s Division of Indian and Native American Programs (DINAP):** Over the past few years, DINAP’s staff has been drastically reduced from 17 positions to just six (with no administrative support staff), making it virtually impossible for DINAP to adequately support the Indian and Native American programs it is obligated to serve. DOL’s Employment and Training Administration (ETA) should immediately increase DINAP’s staff size to *no less than 15 positions* (13 professional positions and two administrative support staff positions) to ensure adequate technical assistance and support for WIOA Section 166 grantees, including many smaller grantees with limited capacity that need targeted assistance navigating DINAP’s rules and extensive reporting requirements.²⁶ It also should ensure that all DINAP professional positions are held by persons with special competence in Native workforce programs.

- **Set WIOA Section 166 Performance Standards in Accordance with Grantees’ Needs and Priorities:** WIOA specifies performance metrics designed to hold grantees accountable for the federal funding they receive. For grantees under Section 166, WIOA states that performance metrics must be negotiated with the assistance of the NAETC and each grantee, “taking into account economic conditions, characteristics of the individuals served, and other appropriate factors” (Section 166(h)(2)). But DOL has strayed from Congress’s intent in WIOA in various ways. With one exception, DOL has never established a performance standard that speaks to the third of the three purposes of Section 166 programs explicitly provided in the law – promoting the economic and social development of tribal communities in accordance with the distinct goals and values of those communities.²⁷ DOL must work with each individual grantee reporting directly to DINAP, using the waiver authority in WIOA Section 166(i)(3) as appropriate, to insure that the performance metrics for each grantee are appropriate for the economic and human environments in which the grantee implements its programs.

- **Remove the Fiscal Constraints that Hamper Tribal Planning and Innovation:** Tribal workforce development programs need adequate funding from the federal government, but equally important is removing the obstacles that inhibit tribal control and flexibility when it comes to how that funding is distributed and used. First, the Department of Treasury should allow all federal departments, including HHS, to distribute funds in advance as is permitted for Public Law 93-638 programs. This should specifically include funding for Tribal TANF and other HHS-supported workforce development-related programs. Tribal nations should be able to draw down their annual program monies for TANF, Child Care, and other HHS-funded programs in their entirety at the beginning of each fiscal year without interruption, exception, or delay.²⁸ At a minimum, they should be able to access at least 75 percent of funds up front once they are deemed available, and the adjusted remaining funds in the final quarter of each fiscal year. The current limitations of quarterly and even three-day drawdowns of funding prevents tribal nations from planning, innovating, and preparing for or responding to crises involving workforce-development related activities and initiatives.²⁹ In addition, federal agencies should remove the arbitrary administrative caps that have no documented basis in fact. Instead, federal agencies should allow tribal nations to negotiate indirect

cost rates (IDCs) with DOI's Interior Business Center (as current law requires) that meet their particular needs and priorities, and then honor those IDCs once negotiated.³⁰

- **Appoint at least one Indian Country representative to serve on the American Workforce Policy Advisory Board:** The recently created [American Workforce Policy Advisory Board](#) within the U.S. Department of Commerce's Bureau of Economic Analysis "advises the National Council for the American Worker...on how the Federal Government can encourage the private sector and educational institutions to combat the skills crisis by investing in and increasing demand-driven education, training, and re-training for American workers."³¹ Given the significant number of Native people in need of education and training in high-demand fields and the hundreds of thousands of Native and non-Native people that tribal governments and businesses employ, at least one Indian Country representative should serve on the Advisory Board to provide a necessary voice to the distinct needs and perspectives of tribal nations.
- **Implement NCAI's Tribal TANF Task Force Recommendations:** The Department of Health and Human Services' Administration for Children and Families (ACF) should implement without further delay the [recommendations](#) of NCAI's Tribal TANF Task Force, given the integral role that Tribal TANF programs often play in tribal nations' workforce development efforts.

LONG-TERM POLICY RECOMMENDATIONS



LEGISLATIVE

- **Amend NAETC's Governing Charter to Ensure Full Council Membership at All Times:** Congress must amend WIOA and, in the process, the charter governing the NAETC to allow Council members who have termed out to remain in their positions until their replacements are seated to ensure full Council membership and operational continuity at all times. Specifically, the language at WIOA Section 166 (i)(4)(B) should be amended to state that "Any member appointed to fill a vacancy occurring before the expiration of the term for which the member's predecessor was appointed shall be appointed only for the remainder of that term. A member may serve after the expiration of that member's term until a successor has taken office."
- **Pass Two Technical Amendments to Section 166 of WIOA:** The amendments – which the President and Secretary of Labor should champion – are as follows:
 - (1) **Remove the application of the performance accountability provisions in the WIOA Section 116 from all funds provided to support Indian and Native American Programs under Section 166:** Replace them with the metrics and standards developed specifically for these programs in consultation with the NAETC in accordance with Section 166(h).
 - (2) **Expand Subsection 166(i)(6) to enable tribal nations or other grantees receiving formula funds from any state for adult, youth and/or dislocated worker programs to negotiate an agreement with the state and the Secretary of Labor:** Such agreements would cover utilization of the funds involved under terms applicable to Section 166 programs. This amendment would foster beneficial tribal-state collaboration in the provision of services to Native people, as the experiences of the Gila River Indian Community and other tribal nations in Arizona have demonstrated.
- **Modify WIOA to Require Native Representation on State Workforce Investment Boards:** WIOA eliminated the mandatory Native seat on state workforce investment boards and instead *allows* a representative of a tribal nation or Native organization to be appointed to a state board. The inclusion of a Native representative on state boards is essential if WIOA programs are to effect positive change in Native communities. The federal

government should require that at least one seat on each state workforce investment board be filled by a Native representative with extensive experience supporting workforce development in tribal communities, particularly in states with significant Native populations.³²

- **Enhance the Ability of TCUs to Support Workforce Development:** In partnership with TCUs, community and vocational colleges, and other higher education institutions that serve Native people, the federal government should increase investments in developmental education and academic bridge programs at those institutions so Native people are better able to succeed in college-level courses and qualify for federal workforce development programs.³³ In addition, the State pass-through for the Carl D. Perkins Vocational and Technical Education Act should be eliminated and a tribal version of the Act established that: (1) appropriates direct funding to TCUs to provide basic adult education and job and skills training, (2) features a broad, inclusive definition of what qualifies as an “industry” under the law, and (3) expands the Act’s parameters to support Native people’s pursuit of four-year degrees. None of these investments should come at the expense of funding provided to tribal nations and other Native-controlled entities providing workforce development services.
- **Enhance the Ability of Native CDFIs to Support Workforce Development:** In tribal communities across the country, Native CDFIs play an instrumental role in efforts to develop tribal workforces and seed new employment opportunities upon which those workforces can capitalize. The federal government can strengthen the ability of Native CDFIs to support workforce development in the following ways:
 - (1) **Make permanent the waiver for the non-federal match requirement for the CDFI Fund’s Native American CDFI Assistance (NACA) Financial Assistance Program:** Congress waived non-federal match requirements for NACA from FY09 to FY13 during the recession. While there have been some signs of recovery in Indian Country, many tribal communities are in persistent poverty counties where ongoing investment and opportunities are necessary. The ability of Native CDFIs to access NACA without a non-federal match is a budget-neutral strategy that has worked well to overcome significant economic barriers; increase the flow of capital and credit to Native businesses, homebuyers, and consumers; and increase workforce training and job opportunities. It should be made permanent.³⁴
 - (2) **Increase funding to Native CDFIs to expand financial education training to tribal government employees and other Native workers residing on and around reservations:** CDFIs have a proven track record of providing such trainings, which enhance the financial capability of the Native workforce, in turn enhancing their ability to build their assets and invest in themselves through higher education, professional development, etc.³⁵ Congress should increase annual funding for technical and financial assistance under the NACA Program to at least \$30 million to address the growing number and needs of federally certified Native CDFIs.³⁶
 - (3) **Develop and implement “plug and play” tribal workforce development loan and technical assistance service models** that Native CDFIs can integrate into their existing product/service delivery models, including educational components for tribal leaders, tribal human resource departments, and tribal enterprise managers.³⁷
- **Fund Tribal Nations to Build Their Capacity to Collect, Analyze, and Manage Data on Their Own Populations:** Accurate data plays a critical role in the success of tribal workforce development initiatives. The federal government has a trust responsibility to invest in tribal nations’ building of their governance capacity. This includes strengthening the data collection, management, and analysis capacity of tribal nations and organizations across the board, notably for the purpose of developing tribal workforces. Congress should invest in the building of their data systems and the training of Native workforce development practitioners and researchers to generate useful local labor market data, as well as data in the related sectors of education, health, infrastructure, and economic development.
- **Pass Legislation Requiring Federal Agency Compliance with Tribal TERO Laws:** Current TERO laws have not been

consistently recognized and followed by federal agencies that either manage or contract for projects or other programs on tribal land, limiting opportunities for employment of qualified tribal citizens and contributing to high rates of unemployment and poverty.³⁸ Congress should pass legislation that requires “federal agencies to recognize and follow the Tribal Employment Rights laws of the Reservation for federal projects and programs occurring on the Reservation, ceded areas, or within a reasonable commuting distance of the Reservation boundaries.”³⁹

- **Expand Career & Technical Education Program Opportunities for Native People:** This should include an expansion of – and significantly increased funding for – the Job Corps program in tribal communities. Such expansion would bolster the ability of Native people to obtain certifications and diplomas in trades such as electrical, carpentry, plumbing, HVAC, and welding that would make them more marketable.⁴⁰
- **Create Tribal Set-Aside for Diversion and Re-Entry Programs:** More and more tribal nations are developing effective diversion and re-entry programs with strong workforce training components to empower troubled tribal citizens to find work and avoid prison – and prepare them to secure employment once they leave.⁴¹ Congress should increase funding for such programs and ensure that it is flexible so that tribal nations and Native organizations can tailor it to their particular needs and priorities.
- **Make Funding for Tribal Vocational Rehabilitation (TVR) Programs Permanent:** The 85 TVR programs across the country must apply for discretionary funding every five years. Among other things, this forces them to compete with one another for financial support, and also inhibits their ability to engage in long-term, strategic planning to maximize program effectiveness. The federal government should amend the regulations governing TVRs to treat them the same as state-administered vocational rehabilitation programs by making their funding permanent.
- **Include a Tribal Set-Aside for All State Block Grant Programs:** Tribal nations and TCUs need access to federal block grant funding that currently goes to states, including Adult Basic Education/GED funding and career and technical education funding.⁴²
- **Invest in and Remove Obstacles to Infrastructure Development and Rehabilitation in Indian Country:** The national systemic problem of physical infrastructure development and neglect is nowhere more severe than in Indian Country. Not only does the federal government need to invest in Indian Country infrastructure development, but the unnecessary obstacles standing in the way of tribal efforts need to be removed to enhance these activities. This will expand the number of direct jobs available in tribal communities, and training opportunities for tribal members to secure those jobs.⁴³



ADMINISTRATIVE

- **Rectify Federal Data Shortcomings that Hamper Tribal Workforce Development Efforts:** The ability of tribal nations, Native organizations, and tribal colleges and universities to create and sustain effective workforce development initiatives depends on their informed understanding of the current tribal workforce and the specific nature and gravity of the challenges they face in developing that workforce. Informing that understanding requires they have reliable, relevant, localized data at their fingertips. However, the federal streams of data currently available are sorely lacking. In particular, the standard definition of unemployment used by the Bureau of Labor Statistics and the Census Bureau requires an “active search for work” within the previous four weeks, a requirement that is irrelevant on many Indian reservations and other areas where Native people who need employment readily know whether jobs are locally available for persons with their qualifications. In addition, the decennial U.S. Census no longer collects the data necessary to accurately detail the socio-economic characteristics and labor force participation and needs of Native people. And the American Community Survey has failed to fill that void. The federal government can address these data shortcomings in the following ways:

(1) Produce the American Indian Population and Labor Force Report: The 2017 Indian Employment, Training and Related Services Consolidation Act transferred the responsibility for producing the American Indian Population and Labor Force Report from DOI to DOL. DOL staff in the Bureau of Labor Statistics, DINAP, and other federal units reportedly have been meeting to discuss how to carry out DOL's new responsibility. However, to date they have not taken any action to involve tribal leaders, WIOA Section 166 grantees, practitioners, or researchers in this effort. DOL and specifically ETA officials must immediately inform NAETC, the Section 166 grantee community, tribal leaders, and other key tribal stakeholders about the internal discussions to date on this report. Further, they should develop and implement a plan that fully involves NAETC and tribal leaders in the design, implementation, and publication of the report.

(2) Conduct systematic review of federal data collection measures: The ETA – in collaboration with NAETC and tribal leaders – should review the agency data collection measures of all agencies producing relevant data on the Native population in order to strengthen the compatibility of data across the federal government and the usefulness of that data to tribal nations and communities.

(3) Enable tribal nations and organizations to challenge the use of federal data in fund allocation procedures: Tribal nations and off-reservation organizations serving Native people should be allowed to challenge data that is not representative of community conditions and propose the use of alternative data, including tribal census data collected by the tribal nation or organization itself. At the same time, the federal government must put in place safeguards to prevent tribal nations and organizations from submitting data that is not consistent with federal standards in order to avoid significant funding inequities among grantees.

- **Establish a Strong Technical Assistance Program for WIOA Section 166 Grantees:** WIOA specifically authorizes a technical assistance program for tribal and off-reservation grantees funded by and reporting directly to DINAP. The statutory purpose of this program is established as “enabling [grantees] to improve the activities authorized [under Section 166].”⁴⁴ For several years, a Section 166 grantee provided that technical assistance, enlisting the support of experienced program directors that traveled to individual grantee sites and offered suggestions as to how grantees could improve their program services and meet ETA requirements. However, the ETA terminated that technical assistance agreement, replacing it with a contracting arrangement that does not provide grantees with adequate technical expertise, an issue compounded by the wholesale reduction in DINAP staff support. Through close consultation with NAETC, the ETA should replace the current arrangement with a strong technical assistance program for WIOA Section 166 grantees, staffed by experienced Native workforce, education, economic development, and social services professionals capable of addressing the wide range of assistance needs of both tribal and off-reservation grantees.⁴⁵ This new program should (among other things):

(1) help grantees understand and navigate the federal requirements for Section 166 grants;

(2) educate grantees about the *full range of services* that tribal grantees can rightfully support using Section 166 funding, as permitted by the law and program regulations;⁴⁶ and

(3) support grantees in utilizing the law’s waiver authority to implement approaches that promote the economic and social development of their communities “in accordance with the goals and values of [those] communities.”⁴⁷

- **Elevate the Native American Employment and Training Council within the Department of Labor:** This should feature (1) the direct involvement of the Office of the Secretary and the Assistant Secretary for Employment and Training in NAETC meetings, and (2) the facilitation of an ongoing, open dialogue with staff in these offices to swiftly rectify issues that inhibit DOL's ability to support tribal innovation in the planning and delivery of DOL-funded workforce development services.⁴⁸ The Secretary of Labor also should convene a summit with NAETC and DOL's Section 166 grantees to collaboratively develop strategies for bringing these programs up to their full potential in the 21st century.⁴⁹

- **Clarify DOL ETA Policy Governing the Designation of Section 166 Grantees to Fully Recognize Their Ability to Deliver Workforce Services in Their Chosen Geographic Service Areas:** WIOA's reference to "competition" in Section 166(c) should *not* be construed to mean that the process used to designate tribal nations and Native organizations as Section 166 grantees is to be conducted in the same way the federal government uses to procure equipment, supplies, and services for its own use. DOL ETA policy should defer to the often unique circumstances and priorities of tribal nations and communities in the designation process, in part by taking into account their past record in delivering such services to Native people in the geographic areas the applicant proposes to serve.
- **Restructure Programs Like YouthBuild to Allow Tribal Consortia to Apply Under a Single Grant:** For a single, small tribal nation, the prospect of administering the YouthBuild Program is daunting given the cost-per-student ratio and limited training opportunities available.⁵⁰ The federal government should revise the eligibility criteria of YouthBuild and similarly structured programs to allow small tribal nations and/or the intertribal organizations that represent them to band together to apply under a single grant.⁵¹ Creating a "Tribal YouthBuild" program featuring increased funding also would enable tribal nations to overcome the fiscal, administrative, and physical infrastructure challenges associated with operating YouthBuild under the existing program. Finally, to better serve tribal communities, the program should be modified to enable tribal entities to target specific Native populations rather than geographies.
- **Add Dental Health Aide Therapist as an Occupation to DOL's Updated Standard Occupational Classification System and Manual:** The position of Dental Health Aide Therapist (DHAT) (a mid-level provider analogous to a nurse practitioner or physician assistant in the medical field) was developed and piloted by tribal nations in Alaska as an innovative solution to the dental provider shortage that existed in the state. For more than 10 years now, DHATs have been providing high-quality, culturally competent, cost-effective, and safe care to the communities they serve. The potential of mid-level providers has been noticed in many places outside of Alaska, including Minnesota, where the state passed legislation (2009) and established its own mid-level provider program. Several other states have passed laws allowing mid-level dental providers, and many more states are in the process of drafting, debating, and considering legislation to establish similar mid-level providers. It should be added as an occupation to the next update of Standard Occupational Classification System and Manual.
- **Compel Federal Agencies to Follow Tribal Employment Rights Laws:** Current TERO laws have not been consistently recognized and followed by federal agencies that either manage or contract for projects or other programs on tribal land, limiting opportunities for employment of qualified tribal citizens and contributing to high rates of unemployment and poverty.⁵² The President should issue an Executive Order calling on all federal agencies to recognize and follow the Tribal Employment Rights (TERO) laws of tribal governments.⁵³
- **Foster Tribal "Innovation" Within the Workforce Innovation and Opportunity Act Section 166 Program:** While the word "innovation" is part of the title of the Workforce Innovation and Opportunity Act, the Act appears to provide no mechanism to foster innovation in tribal workforce programs. The ETA, working closely with the NAETC, tribal government and Native organization leaders, and program practitioners should devise opportunities for Section 166-funded grantees to explore new techniques, particularly oriented towards the development of preventative services for Native people of all ages and the cultivation of self-sufficiency in Native communities over the long run.⁵⁴ DOL should provide seed grant funding for tribal innovation pilot projects from its general funds (*not* Section 166-designated funds for this purpose, and it also should actively seek out other public and private funders to support the effort.
- **Emphasize the Development of Technical Expertise:** Programs offered by federal agencies that are available to tribal schools and tribal citizens should emphasize technology-specific curricula and training. The Administration should provide access to job training initiatives that promote technical skill development for Native people to work in emerging industries – for instance, by expanding the Department of Energy's Energy Education and

Workforce Development programs to include tribal governments, TCUs, and tribal businesses in its education, training, and technical assistance programs that are a critical part of the national effort to create green jobs. Tribal provisions should be included for technical training in all federal agency education and job training programs.⁵⁵

- **Initiate Mandatory Cultural Competency Training for All Federal Agency Staff Working on Tribal Workforce Development:** This training – which should be provided by tribal workforce development experts – is particularly critical for mid-level managers. It should include a general education about Indian Country, tribal nations, and tribal sovereignty as well as instruction about tribal best practices/innovations in workforce development to demonstrate the efficacy of tribally led workforce development, and how the federal government can and should play a supportive role in such efforts.⁵⁶
- **Support the Documentation and Dissemination of Best Practices Under 477, WIOA, Tribal TANF, etc.:** The federal government should document – or provide funding for others to document – innovative approaches and best practices crafted by tribal nations and Native organizations in order to shorten the learning curve for their peers who are seeking to strengthen their workforce development efforts.
- **Foster Closer Collaboration between Tribal Workforce and Economic Development Initiatives:** The Administration should launch a joint examination by tribal leaders, workforce development practitioners, and federal agency managers to examine the regulations and policies of programs in Commerce, Education, Health and Human Services, Housing and Urban Development, DOI, DOL, Treasury, and the Small Business Administration that support tribal economic development and tribal workforce development to insure that these programs work in tandem to stimulate the development of tribal economies and build the human capacity needed to drive that development. The federal government also should exempt activities and funds spent on integrated economic and workforce development planning and operations from restrictions on expenditures, program reporting, and accountability requirements that are focused primarily on the skill development of individual participants.

ENDNOTES

¹ Cynthia Lindquist, President, Cankdeska Cikana Community College, conference call, May 13, 2016.

² In this brief, the term “tribal workforce development” inclusively refers to all Native-led or Native-controlled efforts to develop the Native workforce both on and off tribal lands, whether those efforts are undertaken by tribal governments, Native non-profit organizations, or tribal colleges and universities.

³ *Seminole Nation v. United States*, 316 U.S. 286, 297 (1942).

⁴ Pub. L. No. 93-638, 88 Stat. 2203, 2203 (1975).

⁵ 25 USC 3401, Section 2 (<https://www.bia.gov/sites/bia.gov/files/assets/bia/ois/ois/pdf/idc1-033995.pdf>)

⁶ Indian Employment, Training, and Related Services Demonstration Act Amendments of 2000, Section 1102 (<https://www.bia.gov/sites/bia.gov/files/assets/bia/ois/ois/pdf/idc1-033995.pdf>)

⁷ Workforce Innovation and Opportunity Act of 2014 (P.L. 113-128), 29 USC 3221, Section 166(a)(1)(C) (<https://www.law.cornell.edu/uscode/text/29/3221>, accessed December 7, 2019).

⁸ Workforce Innovation and Opportunity Act of 2014 (P.L. 113-128), 29 USC 3221, Section 166(a)(2) (<https://www.law.cornell.edu/uscode/text/29/3221>, accessed December 7, 2019).

⁹ Exec. Order No. 13175, 65 Fed. Reg. 67,249 (Nov. 6, 2000).

¹⁰ See NCAI Resolution #REN-19-025: Supporting Immediate Amendments to the Inter-oAgency MOA Governing the Indian Employment, Training and Related Services Consolidation Act of 2017 to Ensure Its Full and Proper Implementation, June 2019, p. 1 (http://www.ncai.org/attachments/Resolution_TwUzdFCppwmoNI-JTjhLgvqNLegonLGuwPBdESjdrZPjBpfolSVz_REN-19-025%20FINAL.pdf, accessed January 6, 2020).

¹¹ *Ibid.*

¹² U.S. Government Accountability Office (GAO). Employment and Training Programs: Department of Labor Should Assess Efforts to Coordinate Services Across

Programs. Report to the Permanent Subcommittee on Investigations, Committee on Homeland Security and Governmental Affairs, U.S. Senate. GAO-19-200, March 2019, pp. 26-27.

¹³ Government Performance and Results Act (GPRA) data (FY 2018), Division of Workforce Development, U.S. Department of the Interior, 2018.

¹⁴ Data provided by Duane Hall, Lead Federal Project Officer, Division of Indian and Native American Programs, U.S. Department of Labor, September 5, 2019.

¹⁵ Data provided by Duane Hall, Lead Federal Project Officer, Division of Indian and Native American Programs, U.S. Department of Labor, December 20, 2019.

¹⁶ NCAI Partnership for Tribal Governance. Tribal Workforce Development: A Decision-Framing Toolkit. Washington, D.C.: National Congress of American Indians. 2018, p. 11 (http://www.ncai.org/ptg/WDEV_TOOLKIT.pdf, accessed December 5, 2019).

¹⁷ *Ibid.*, p. 31.

¹⁸ *Ibid.*, p. 11.

¹⁹ *Ibid.*, p. 27.

²⁰ *Ibid.*, p. 9.

²¹ Poverty rates tell a similar story: In 2017, the U.S. Census Bureau reported that 25.4 percent of single-race American Indian and Alaska Native people were in poverty, the highest rate of any major racial group. For Indian reservation areas, the American Indian and Alaska Native poverty rate was a staggering 37.9%. In comparison, the nation’s overall poverty rate was 13.4% in 2017.

²² American Community Survey (ACS) five-year estimates, 2013-2017 (<https://www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2017/5-year.html>, accessed December 17, 2019).

²³ NCAI. *Winds of Change: Protecting our Nations and People into the Future* (Indian Country FY 2020 Budget Request), February 2020, p. 93 (<http://www.ncai.org/NCAI-FY20-BudgetReport-PREVIEW.pdf>, accessed November 3, 2019)

²⁴ See Public Law 115-93 (December 2017), 131 STAT. 2027, Section 5(a) (<https://www.congress.gov/115/plaws/publ93/PLAW-115publ93.pdf>, accessed December 6, 2019).

²⁵ Between 2017 and 2019, NAETC's 17-member Council gradually declined in size as sitting members termed out and DOL failed to solicit nominations to seat their replacements. For several months during that period, there essentially was no NAETC when the Council's remaining five members termed out and were not replaced in a timely fashion.

²⁶ Consistent with this language, ETA provides individual tribal governments with Section 166 WIOA funds, for both the Comprehensive Services Program and the Supplemental Youth Services program, totaling as little as \$28,000 annually. Of the 71 tribal nations and tribal consortia funded by and reporting directly to DINAP, 18 have total annual grants for Program Year 2018 of less than \$100,000; 62 have annual grants of less than \$500,000. The special nature of tribal governments and the size of the grants makes the Indian and Native American programs unique within WIOA.

²⁷ There is no other program in WIOA that has this unique purpose. In addition, Section 166 programs operate in different environments than do state-administered WIOA programs. Their client bases and the typical employment prospects of program clients also are different. The economic environments in tribal communities are often different. These factors, together with the lack of appropriate quantitative information on the circumstances of the individual grantee programs, make the development of a statistical model to establish performance standards for Section 166 grantees, including the one developed under Section 116(b)(3)(A)(viii) of WIOA, not "practicable" (Section 166(h)(2)).

²⁸ According to one former tribal workforce development practitioner, "Because of the way funding is done, we're not getting the funds on time. It's interrupting the effectiveness of 477 on our reservation" (Eileen Briggs, Former Executive Director, Tribal Ventures, Cheyenne River Sioux Tribe, conference call, May 13, 2016).

²⁹ Workforce Development Roundtable, U.S. Senate Committee on Indian Affairs, December 3, 2015.

³⁰ Margaret Zientek, Co-Chair, 477 Tribal Workgroup, conference call, February 5, 2016.

³¹ American Workforce Policy Advisory Board, U.S. Department of Commerce website (<https://www.commerce.gov/americanworker/american-workforce-policy-advisory-board>, accessed December 8, 2019).

³² Tribal Leader Briefing Book, 2015 White House Tribal Nations Conference, NCAI, p. 32

³³ *Ibid.*

³⁴ *Ibid.*, p. 42.

³⁵ Cora Mae Haskell, Asset Development Coordinator, Four Bands Community Fund, email correspondence, June 7, 2016.

³⁶ Demand for the Native American CDFI Assistance Fund has long significantly outweighed the supply of NACA funds. According to the U.S. Department of the Treasury's CDFI Fund, there were \$33.6 million in applications from 53 Native CDFIs for the NACA program for Fiscal Year 2018 (NACA Program Award Book FY 2018, 2018, p. 5). Meanwhile, in 2017 the Federal Reserve Bank's Center for Indian Country Development estimated the unmet funding need for Native CDFIs applying through the NACA program at \$48 million (Kokodoko, Michou, Findings from the 2017 Native CDFI Survey: Industry Opportunities and Limitations, Federal Reserve Bank of Minneapolis, Working Paper No. 2017-04, Minneapolis, MN, 2017).

³⁷ Gary Mejchar, Program Manager, First American Capital Corporation, email correspondence, June 6, 2016.

³⁸ Tribal Leader Briefing Book, 2015 White House Tribal Nations Conference, NCAI, p. 31; NCAI Workforce Development Survey, March 2016.

³⁹ Affiliated Tribes of Northwest Indians Resolution #15-08, "Calling for Congressional Hearings on the need to Require all Federal Agencies on Recognize and Adhere to Tribal Employment Rights Laws when Hiring for Federal Projects on Reservations," 2015, p. 2 (<http://www.atntribes.org/resolutions/calling-congressional-hearings-need-require-all-federal-agencies-recognize-and-adhere>, accessed August 9, 2016).

⁴⁰ Alex Yazza, Jr., Former Executive Director, Owens Valley Career Development Center, email correspondence, December 2, 2015. Such program expansion would be of particular benefit to Native youth/young adults who have not obtained their high school degrees to gain a high school equivalency diploma/certificate plus invaluable on the job experience.

⁴¹ Workforce Development Roundtable, U.S. Senate Committee on Indian Affairs, December 3, 2015.

⁴² Workforce Development Roundtable, U.S. Senate Committee on Indian Affairs, December 3, 2015; NCAI

Workforce Development Survey, March 2016.

⁴³ Ibid.

⁴⁴ WIOA Section 166(i) (5), 2014 (<https://www.govinfo.gov/content/pkg/PLAW-113publ128/html/PLAW-113publ128.htm>, accessed December 8, 2019)

⁴⁵ Ideally, this new program should include direct financial support for one or a consortium of organizations, including current grantees. Those staffing the technical assistance effort should have the necessary experience, along with the ability to provide assistance at individual grantee sites as well as at multi-grantee training workshops.

⁴⁶ There is a real need for experienced practitioners to spend significant time in the field helping grantees that are struggling, in part because they have been hamstrung by word-of-mouth “policies” that have been fabricated by federal agency representatives or the grantee’s own staff over the years, policies that keeps many grantees from spending money for worthwhile initiatives. For example, repeated references by DOL staff to the Comprehensive Services Program (CSP) as an “adult” program has kept urban grantees from doing anything for youth with their Section 166 CSP money. There is no age limit for services under the CSP and never has been.

⁴⁷ WIOA Section 166(a) (1) (C), 2014 (<https://www.govinfo.gov/content/pkg/PLAW-113publ128/html/PLAW-113publ128.htm>, accessed December 8, 2019)

⁴⁸ WIOA Section 166(i) (4) explicitly provides that the NAETC provide advice to the Secretary of Labor. However, the Council has only rarely had the opportunity to directly dialogue with the Assistant Secretary for Employment and Training, and even more rarely with the Secretary of Labor (<https://www.govinfo.gov/content/pkg/PLAW-113publ128/html/PLAW-113publ128.htm>, accessed December 8, 2019).

⁴⁹ Tribal Leader Briefing Book, 2015 White House Tribal Nations Conference, NCAI, p. 32 (http://www.ncai.org/conferences-events/ncai-events/2015_WHTNC_Briefing_Book_Final.pdf, accessed August 9, 2016).

⁵⁰ NCAI’s Fiscal Year 2021 Indian Country Budget Request advocates for maintaining YouthBuild Program funding at a minimum of \$89 million, consistent with WIOA Section 171; it also requests Native youth receive program support from this funding pool commensurate with their percentage of the eligible participant population as well as their identified needs (publication forthcoming).

⁵¹ NCAI Fiscal Year 2017 Indian Country Budget Request, (http://www.ncai.org/resources/ncai%E2%80%90%20publications/10_FY2017_economic_development.pdf, accessed August 1, 2016).

⁵² Tribal Leader Briefing Book, 2015 White House Tribal Nations Conference, NCAI, p. 31; NCAI Workforce Development Survey, March 2016.

⁵³ For more info, see NCAI Resolution MSP-15-034, passed in 2015 (<http://www.ncai.org/resources/resolutions/calling-for-all-federal-agencies-to-recognize-and-adhere-to-tribal-employment-rights-laws-for-federal-projects-on-or-near-reservations-tribal-lands-and-ceded-areas-of-each-tribe>, accessed July 20, 2016).

⁵⁴ The current set of program services, originating in Section 302 of the Comprehensive Employment and Training Act of 1973, essentially created a “second chance” system designed to serve those who had already encountered difficulties in joining or rising within the labor force to overcome their handicaps. This orientation is still very relevant for many members of our tribal nations and communities. At the same time, there is no “first chance” set of services to enable tribal nations and communities to prevent the occurrence of these problems. An analysis of Census Bureau data over the two-decade period from 1990 to 2010 shows relatively minimal progress in moving the Native population from their very disadvantaged position with respect to the key economic indicators of unemployment and poverty. While many thousands of Native people benefit from “second chance” services to become more self-sufficient, others fall behind and take their places. In the WIOA Section 166 environment, for example, “second chance” services start no earlier than age 14. Grantees serving off-reservation communities have been led to believe that they cannot serve youth because Labor has labeled the Comprehensive Services Program an “adult” program when that program does not have and never has had any age restriction. Working with children and youth at earlier ages to encourage habits and aspirations that can insure them an economically productive future are regarded as some other program’s business. There are models of cradle-to-adulthood services, some supported by private philanthropies. Yet these remain almost entirely unknown to the tribal nations and organizations participating in federally-funded workforce development programs. DOL’s longstanding approach of supporting workforce programs only in “silos” of their own must end.

⁵⁵ Tribal Leader Briefing Book, 2015 White House Tribal Nations Conference, NCAI, p. 32.

⁵⁶ NCAI Workforce Development Survey, March 2016.

Key Data Points Supporting a Funding Increase in Section 166 WIOA Comprehensive Services Program

31.4%

- Increase in total size of American Indian/Alaska Native-only population between 2000 and 2018¹

Nearly Twice
As High

- Unemployment rate of American Indian/Alaska Native-only population compared to rate for total population²

Nearly Twice
As High

- Poverty rate of American Indian/Alaska Native-only compared to rate for total population³

42.1%

- Loss in purchasing power due to inflation for funds provided through Section 166 Comprehensive Services Program in 2019 compared to 2000 price levels⁴

43.7%

- Increase in the cost of tuition, fees, room, and board for two-year public colleges and universities from 2001-2002 to 2017-2018⁵

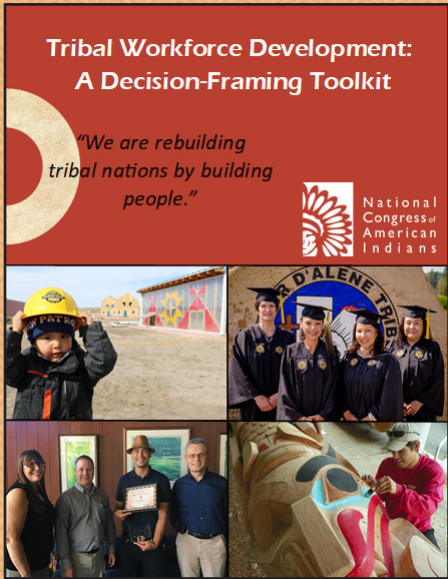
56.6%

- Increase in the cost of tuition, fees, room, and board for four-year public colleges and universities from 2001-2002 to 2017-2018⁶

NOTES

1. U.S. Census Bureau, 2000 Decennial Census and 2018 Population Estimates (the 2018 number from the Census Bureau's Population Estimates Program has been adjusted to make it comparable to the count in the 2000 Census)
2. U.S. Census Bureau, 2018 1-Year American Community Survey (ACS) estimates
3. U.S. Census Bureau, 2018 1-Year American Community Survey (ACS) estimates
4. U.S. Department of Labor, Section 166 Comprehensive Services Program allocation table; Bureau of Economic Analysis, GDP Price Deflator applicable to state and local government expenditures
5. U.S. Department of Education, National Center for Education Statistics
6. U.S. Department of Education, National Center for Education Statistics

NCAI TRIBAL WORKFORCE DEVELOPMENT RESOURCES



TRIBAL WORKFORCE DEVELOPMENT: A DECISION-FRAMING TOOLKIT

NCAI designed this toolkit for tribal leaders, workforce development practitioners, and other key decision-makers responsible for tackling the daunting and complex task of evaluating, refining, expanding, and in some cases, completely overhauling the workforce development approaches for which they are responsible. The toolkit seeks to frame and inform strategic decision making by tribal policy makers at a foundational level by providing them a comprehensive lens through which they can identify, develop, and implement effective, sustainable workforce development solutions tailored to their distinct needs and ends.

“INNOVATION SPOTLIGHT” CASE STUDIES



Confederated Salish and Kootenai Tribes



Coeur d'Alene Tribe



Gila River Indian Community



Ysleta del Sur Pueblo

To join NCAI's workforce development email listserv, please email workforcedev@ncai.org and put **“SUBSCRIBE”** in the subject line.

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ABOUT THIS BRIEF

NCAI is committed to maintaining this brief as a living, evolving document through ongoing input from tribal leaders and workforce development practitioners and feedback from federal policymakers. To share your thoughts and suggestions with NCAI, please contact Ian Record, Vice President of Tribal Governance and Special Projects, at irecord@ncai.org.

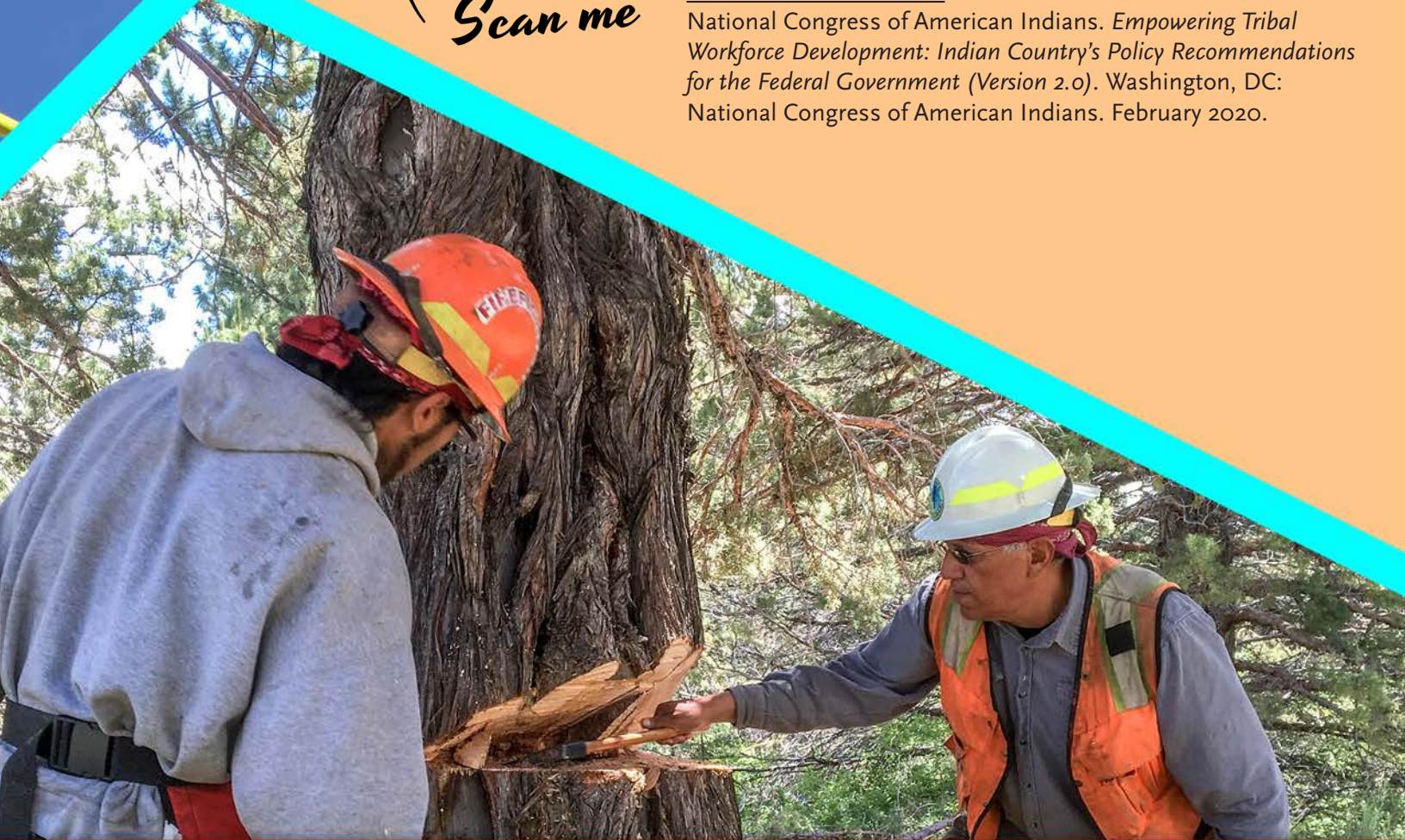


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To access the digital version of this brief, a list of related resources that provide further context and details about the brief's recommendations, and more information about NCAI's tribal workforce development initiative, please visit: www.ncai.org/ptg/workforce-development.

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