Human Trafficking Policy & Research Analyses Project

Conducting Culturally Responsive Evaluation Engagement with Tribal and Native Communities

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Introduction

Indigenous or Native[1] Tribal governments and organizations are forming and managing programs to address the needs of their citizens experiencing human trafficking and related victimization. As Native governments and organizations initiate and grow programs, there is an expectation that they will achieve their desired goals, objectives, and outcomes. In particular, Native governments, programs, and citizens are interested in how cultural or Tribal-based elements, features, and practices are used to create culturally responsive services, referrals, and delivery systems and then incorporated into policies and procedures. Infusing cultural elements requires program developers to rely on the unique practice-based evidence[2] in Native and Indigenous cultures. Simultaneously, program developers must meet funding agencies' programmatic requirements and employ evidence-based practices.[3] Different program evaluation methods can help demonstrate how a Native program is doing during phases of formation, implementation, and maturation.

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[1] We use the term "Native" or "Indigenous" to refer to people who self-identify as Native American, Alaska Native, Native Hawaiian, or Pacific Islander.

[2] Practice-based evidence refers to "a range of treatment approaches and supports that are derived from, and supportive of, the positive cultural attributes of the local society and traditions. Practice-based evidence services are accepted as effective by the local community, through community consensus, and address the therapeutic and healing needs of individuals and families from a culturally specific framework. Practitioners of practice-based evidence models draw upon cultural knowledge and traditions for treatment and are respectfully responsive to the local definitions of wellness and dysfunction" (Isaacs et al., 2005, p. 16).

[3] Evidence-based practices are developed based on (1) the best available research evidence, (2) the population's characteristics, state, needs, values, and preferences, and (3) resources, including practitioner's expertise—all within the environment and organizational context (Satterfield et al., 2009).

Federal agencies increasingly include program evaluation in solicitation announcements[4] and inform applicants about the potential for an evaluation of awarded projects. The program evaluation often is funded separately and structured as a multisite or cross-site evaluation among the awarded cohort. Although applicants are aware of the potential of a program evaluation and their expected participation, submitting a proposal does not equate to a Tribal government's approval of the evaluation as the design and methods are not yet known. At best, it sets in motion the steps for an awarded Tribal-based program to participate and for an independent evaluator to obtain formal permission to conduct a federal agency-sponsored evaluation.

The Administration for Children and Families' (ACF's) Office on Trafficking in Persons (OTIP) administers the Demonstration Grants to Strengthen the Response to Victims of Human Trafficking in Native Communities (VHT-NC) Program. The VHT-NC Program is intended to serve Native Americans (i.e., American Indians, Alaska Natives, Native Hawaiians, and/or Pacific Islanders) who have experienced human trafficking and broadly focuses on three components: (1) project participant[5] outreach and identification, (2) comprehensive case management and service provision, and (3) community training.

The VHT-NC Program notification of funding opportunity included program evaluation participation requirements (see **sidebar**). ACF's Office of Planning, Research, and Evaluation (OPRE), in consultation with OTIP, oversaw the VHT-NC formative evaluation. To ensure a culturally responsive evaluation design, the lead evaluator, RTI International, partnered with American Indian Development Associates, LLC (AIDA) to form an evaluation team with complementary knowledge, skills, and abilities conducting survivor-centered and participatory evaluations and experience working with Native Tribes, communities, and citizens. AIDA's experience developing and administering studies in Native communities informed understanding of the concerns that Native people and Tribes have when researchers miss or skip proper engagement steps. This expertise helped refine the VHT-NC formative evaluation design, materials, protocols, and data collection and resulted in the inclusion of new strategies. The combined evaluation team's strengths facilitated discussions to address Tribal data sovereignty concerns and proactively prevent missteps.

The multisite VHT-NC formative evaluation involved participatory and culturally responsive approaches and was informed by and incorporated the knowledge, values, and traditions of the VHT-NC projects and communities. This brief discusses the guiding principles, methods, and approaches the VHT-NC evaluation team used, including our strategies for Tribal study approval and community engagement.

> **VHT-NC program evaluation notification of funding opportunity requirements:**
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> "OTIP may fund a formal evaluation of the VHT-NC Program. If applicable, the VHT-NC prime recipient must agree to participate in the formal evaluation and make available program implementation records for VHT-NC–funded activities. It includes activity records from subrecipient(s) and program performance data. … The VHT-NC prime recipient must monitor their own performance and any subrecipient(s). Appropriate staff support must be dedicated to evaluation activities, including data collection, data reporting, and coordination with the evaluator."

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[4] Solicitation announcements may be referred to as a Notification of Funding Opportunity (NOFO), Funding Opportunity Announcement (FOA), or Request for Application (RFA).

[5] We use the term "participants" to refer to people who have been enrolled into and assisted by one of the VHT-NC projects.

Culturally Responsive Evaluation Principles and Approaches

Evaluations must begin by understanding and acknowledging the concerns Tribal governments and Native people have with past research abuses and misconduct by researchers. Data sovereignty is a critical concern for Native Tribes, organizations, and individuals. Evaluators must clearly outline how their evaluation designs address study approvals; community engagement; and data collection, protection, usage, and storage. This includes knowing the extensive measures taken by Native people, organizations, and Tribal governments to establish study regulations that evaluators and researchers should follow (see **sidebar**).

AIDA's knowledge and experience enabled the incorporation of culturally respectful, relevant, and responsive principles for engaging Native Tribal governments and organizations. With this expertise, the evaluation incorporated methods to obtain and review each award recipient's study protocols to ensure the design addressed concerns and followed each participating site's specific steps to obtain evaluation approval, as appropriate.

Acknowledging and showing respect for Tribal sovereignty is essential!

American Indian and Alaska Native Tribes possess inherent authority to determine what evaluations are conducted on their lands, with government programs involving Tribal citizens and other residents. Tribal governments make these decisions in various ways. Some have enacted laws and policies to guide research, evaluation, and other studies to guide decisions about the types of data collected, methods used to collect and protect data, and how data are used. Some have Institutional Review Boards (IRBs), licensing boards, or commissions; others belong to Tribal epidemiology center IRBs; and others rely on their governing Tribal Councils to meticulously review and approve study proposals and designs.

Guiding Principles for the VHT-NC Formative Evaluation

An extensive body of literature and traditional knowledge from Indigenous researchers and evaluators worldwide discuss guiding principles and approaches for culturally responsive evaluation with Indigenous communities. AIDA applied its practice-based methodologies and extensive experience conducting Tribal-specific national and local studies to actively involve Native Tribes, communities, and citizens in the evaluation framework. This approach aimed to facilitate meaningful engagement of project staff, their partners, and the communities they serve. **Exhibit 1** displays the VHT-NC formative evaluation's guiding principles, developed by AIDA, which are described below.

Exhibit 1. Guiding Principles

Place-Based

Nurturing Relationships

Respect for Tribal Sovereignty

Capacity Building and Giving Back

Community-Based and Participatory

Strength-Based

Place-Based: Rich understandings of context and place are critical values in Indigenous evaluation approaches, in contrast to Western-dominant knowledge generation that seeks to advance generalizable knowledge. Research and evaluation that use place-based strategies are mindful of incorporating the richness of local context into design and dissemination without oversimplification.

Our evaluation holistically incorporated place-based strategies in the evaluation planning, engagement approaches with VHT-NC project staff and communities, data analysis, and storytelling (e.g., final report) through the following steps (described in detail in later sections):

- ◈ We prepared internal project profiles to inform our baseline understanding of the projects' community context by documenting Indigenous ties to the land and geography; social, political, and economic structures; culture; language; environment; and historical and contemporary experiences.
- ◈ We held check-in calls with VHT-NC project staff regularly and convened a Community Expert Group (CEG) to deepen our understanding of the community contexts in which the VHT-NC projects were implemented.
- ◈ We developed evaluation questions and data collection instruments to gather insights into the unique place-based contexts for Native communities and human trafficking, including impacts of historical and intergenerational trauma, community strengths, and protective factors.
- ◈ Our final report[6] used storytelling to share important aspects of each community's context while protecting project staff identities by using standard deidentification practices.
- ◈ We prepared site evaluation summaries to honor Indigenous data sovereignty and help the projects disseminate information to their communities.

Respect for Tribal Sovereignty: Tribes have inherent sovereignty over their lands, their programs, and their citizens. This sovereignty is respected by seeking Tribal approval for any evaluation or research conducted within Tribal lands or about their lands or people. The evaluation followed each Tribal-based site's research approval policies and protocols by preparing and implementing steps to inform the Tribe about the evaluation, explain the design, and gain informed permission to evaluate the VHT-NC project in their community.

Community-Based and Participatory: Indigenous evaluation ethics emphasize meaningful and iterative engagement with the community to incorporate their values, beliefs, strengths, and traditional and contemporary knowledge into evaluation activities. The evaluation integrated a holistic, participatory approach by developing structures for ongoing and meaningful engagement, input, and conversation between the evaluation team, the VHT-NC project staff, and the Native community members that each site nominated to participate in the CEG.

Strength-Based: In the past, research in Native communities frequently disregarded Tribal involvement and concerns for data ownership, management, and usage. Such research failed to be culturally respectful or responsive, often reinforcing harmful narratives and stereotypes and focusing on deficits. Our focus

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[6] The final report is available here: : https://www.acf.hhs.gov/opre/report/demonstration-grants-strengthen-response-victims-human-trafficking-native-communities-0

on Native community strengths, particularly their cultural practices, aimed to empower Indigenous self-determination and promote data sovereignty. The evaluation sought to understand needs and challenges through strength- and solution-based lenses. Project staff and the CEG identified gifts, assets, what works in the community, and strengths to build upon.

Capacity Building and Giving Back: Historically, Native communities have received few benefits from participating in research, contributing to many Native communities' distrust of research and the legacy of *all take—no give* by researchers. Therefore, it is essential for studies in Native communities to intentionally include ways to build capacity and give back to the participating communities.

The evaluation team supported project staff and partners' knowledge through regular feedback and recommendations to apply the data they collect and the formative evaluation findings to their projects. We also provided information about formative evaluation and participatory engagement approaches. Guidance was shared to document measures showing culture as a resource (i.e., how culture is used and incorporated as a project strategy). **Table 1** exemplifies how the VHT-NC projects' cultural activities can be mapped to cultural measures. Additionally, the site-specific evaluation summaries provided to the projects helped to document implementation and facilitate information sharing.

Table 1. Example Cultural Measures Mapped to VHT-NC Project Cultural Activities

	Cultural Measures		
	Immersion	**Healing**	**Services**
Cultural Activities	◆ Native language ◆ Dance and music ◆ Food sharing ◆ Arts and crafts (e.g., beading)	◆ Traditional healing ◆ Native art therapy ◆ Traditional counseling	◆ Talking Circle ◆ Peacemaking ◆ Tribal- or Native-specific services

Nurturing Relationships: Many Indigenous communities' worldviews center on deep communal relationships with each other and our world. Relationship building centered on the evaluation team practicing open communication; shared vision and shared expectations through regular virtual meetings, onsite visits, and review and feedback on project reports; and time and space for discussion with project staff and the CEG.

Culturally Responsive Evaluation Engagement

Tribal approval is vital in the evaluation design phase. Ongoing and meaningful community engagement is also critical to ensuring the evaluation incorporates cultural knowledge and norms and intentionally gives back what is learned to the community. This section describes the steps we took to obtain approvals and participatory strategies to engage with VHT-NC project staff, partners, and communities (see **Exhibit 2**). Several steps occurred concurrently, and responsive guiding principles were woven throughout these engagement pathways.

Exhibit 2.   Participatory Approaches that Honor Native Knowledge, Strengths, and Gifts

Tribal Engagement and Approval

VHT-NC Project Engagement

Community Expert Group

Evaluation Newsletter

Tribal Engagement and Approval

For most Tribal-based programs, formal Tribal government approval is necessary before project staff can participate in any study (such as an evaluation) that involves data collection on Tribal lands, on Tribal jurisdictions, or with Tribal community members. This applies to IRB-determined human subjects and non–human subjects research. Applying for federal funding that requires award recipients to participate in an evaluation usually triggers internal authorization checkpoints that precede Tribal approval for the actual study. The project award should not be considered formal Tribal approval of the study or participation in an evaluation. Even though submitting a proposal or application implies an agreement to participate, the evaluation design is unknown to applicants and the funding agency at this stage. Post-award, evaluators must obtain Tribal approval of the evaluation design before collecting data. This is in addition to approval from the funding agency, and other regulatory agencies, as applicable, such as the Office of Management and Budget (OMB) and IRBs.

Our Tribal approval and engagement strategies demonstrated respect by following each VHT-NC award recipient's Tribal authority structure (as applicable) and research laws or policies regarding approval procedures, publication, data protection, information sharing, and other provisions.

AIDA developed documentation (collectively referred to as "Tribal-based approval protocols") of the formative evaluation's proposed design to facilitate Tribal approval. This documentation clearly and transparently described essential study information using minimal technical language, including the evaluation goals and data collection, usage, and storage plans (see **sidebar**). This documentation helped to ensure the study followed Tribal research laws, policies, and practice-based protocols.

Tribal representatives responsible for approving the study varied for each Tribe. The evaluation team engaged the VHT-NC project staff at each site to learn about each site's approval processes. Tribal representatives from various sites included a Tribal Council, a Tribal Language and Culture Code Commission, a State Commission on Indian Affairs, and non-profit executives. We then shared the Tribal-based approval protocols with the respective representatives and followed their guidance and steps on respectfully seeking Tribal approval. In some cases, this included meeting virtually or requesting placement on agendas to present the evaluation to the Tribal Council,

Components of Tribal-based approval protocols:

♦ *Evaluation team:* Descriptive information about evaluation partners

♦ *Evaluation goals and questions:* Description of the goals and questions guiding the evaluation

♦ *Data collection strategies:* Types of and methods to collect data

♦ *Data protection:* Protocols for safely securing the collected data, respecting respondents' privacy, and protecting confidentiality

♦ *Community and Tribal input:* Description of participatory approaches

♦ *Reporting of findings:* Plans for dissemination and reporting

♦ *Data archiving:* Methods for archiving de-identified data

subcommittees, or other Tribal representatives. The evaluation team demonstrated patience and respect by accommodating the meeting schedules and availability of the Tribes or organizations when scheduling presentations. In these situations, the process took about 6 months from initial engagement to formal approval. For some sites, additional steps were not required beyond our initial engagement, and only an email acknowledging evaluation approval via application submission and award notification was needed. **Table 2** describes the VHT-NC award recipients' governing structure and the type of approval received.

Table 2. VHT-NC Projects' Governing Structures and Needed Approvals

Number of Recipients	Governing Structure	Approval Type
1	♦ Federally recognized Tribe	♦ Resolution approving evaluation following Tribal research laws and protocols
1	♦ Federally recognized Tribe	♦ Email acknowledging evaluation approval at application submission and award notification
1	♦ State government with state recognized Tribal partners	♦ Letter of approval by the State Commission on Indian Affairs on behalf of the member Tribes
1	♦ Non-profit organization with a Tribal partner	♦ Email acknowledging evaluation approval at application submission and award notification for award recipient ♦ Approval from the Tribal partner organization
2	♦ Non-profit organizations with no direct Tribal government partners	♦ Email acknowledging evaluation approval at application submission and award notification

VHT-NC Project Engagement

The Tribal approval process itself was an iterative participatory evaluation approach. The VHT-NC formative evaluation began after the projects were awarded and began initial implementation. Our first step, before beginning Tribal approval, was to introduce the evaluation to the VHT-NC project directors. We sought their feedback on our evaluation design (e.g., evaluation questions, data collection plans, timeline) and guidance on their Tribal approval procedures. These initial meetings with project directors also supported the development of the CEG (described in the next section).

Engaging with the VHT-NC project staff was a significant component of the evaluation's participatory and culturally responsive approach. VHT-NC project staff were knowledgeable about human trafficking in Native communities, their community's context, and their project implementation. Many VHT-NC project staff were also Native-identifying. Engagement with VHT-NC project staff throughout the evaluation's life cycle ensured these perspectives were incorporated. Further, regular communication helped the evaluation team understand and respond to each site's needs.

The evaluation team met virtually every other month with at least one point of contact from each VHT-NC project. The first meeting introduced the evaluation's initial design and goals to project staff and sought input on this preliminary design. We also sought guidance on applicable Tribal approval protocols and recommendations for CEG members. Following this initial meeting, regular project check-in calls provided an informal opportunity for the evaluation team and project staff to share timely information, such as reviewing progress reports and learning about strengths and challenges. VHT-NC project staff attended two CEG meetings to share their projects with CEG members and to reflect on the interim report findings.

The project check-in calls provided an opportunity to build cultural documentation capacity. Cultural data collection is essential for the VHT-NC projects to show how they meet the culturally responsive objective of using culture as a resource. The evaluation team identified that projects were not fully documenting their cultural activities in their progress reports (often because they were unaware how to). As a result, their efforts were underreported, and ACF was missing key pieces of information about the projects' implementation. After our engagement with staff, some projects modified their documentation practices to name culturally specific activities, categorize them, and link them to a project strategy (as shown in **Table 1**).

The evaluation team was intentional about giving back to the VHT-NC projects. In addition to helping them build their cultural documentation capacity, we provided site-specific summaries with data unique to each site and recommendations tailored to their project implementation.

Community Expert Group

The CEG was a core component of our participatory evaluation approach. Members included Native-identifying representatives from each of the VHT-NC service areas. These Tribal and cultural experts provided guidance and feedback on the evaluation design, implementation strategies, analysis, community context, and interpretation of findings through regular meetings (about three per year) with the evaluation team.

CEG members were identified primarily through VHT-NC project staff recommendations or referrals, and one member was identified through professional networks. The evaluation team developed culturally specific outreach materials and provided them to VHT-NC project staff to share with interested community members. CEG eligibility criteria included Native self-identification that aligned with the Tribes and communities served by VHT-NC projects, knowledge of human trafficking, self-reported ability to participate in conversations about human trafficking, and being at least 18 years of age. These criteria were designed to cultivate accessibility to membership across various experiences without requiring any disclosure of lived experience. Individuals who were interested in participating in the CEG could fill out an online interest form or email the evaluation team directly. All interested individuals were sent a document that outlined more information about the opportunity, including anticipated tasks, expected time commitment, compensation, guiding principles for the work together (see **sidebar**), and

CEG Guiding Principles

♦ Cultivate trust through relationship

♦ Trauma-informed: consent and transparency

♦ Privacy and safety

♦ Inclusive and respectful environment

critical facts about the VHT-NC evaluation. All documents were developed to be linguistically accessible (6th–8th grade reading level) and used culturally responsive imagery or design as informed by VHT-NC project staff. CEG members were compensated at a federally approved hourly consulting rate.

The CEG met virtually approximately three times a year. Each meeting began with an opening prayer led by an AIDA evaluation team member and informal check-ins. Two sessions also included staff from the VHT-NC projects. The CEG meeting agendas were structured around the evaluation's current activities, including data collection, instrument development, and emerging themes in the data analysis (see **Table 3**). The CEG members' expertise in human trafficking and cultural knowledge brought invaluable contributions to this evaluation.

Table 3. CEG Meeting Agenda Items and Outcomes

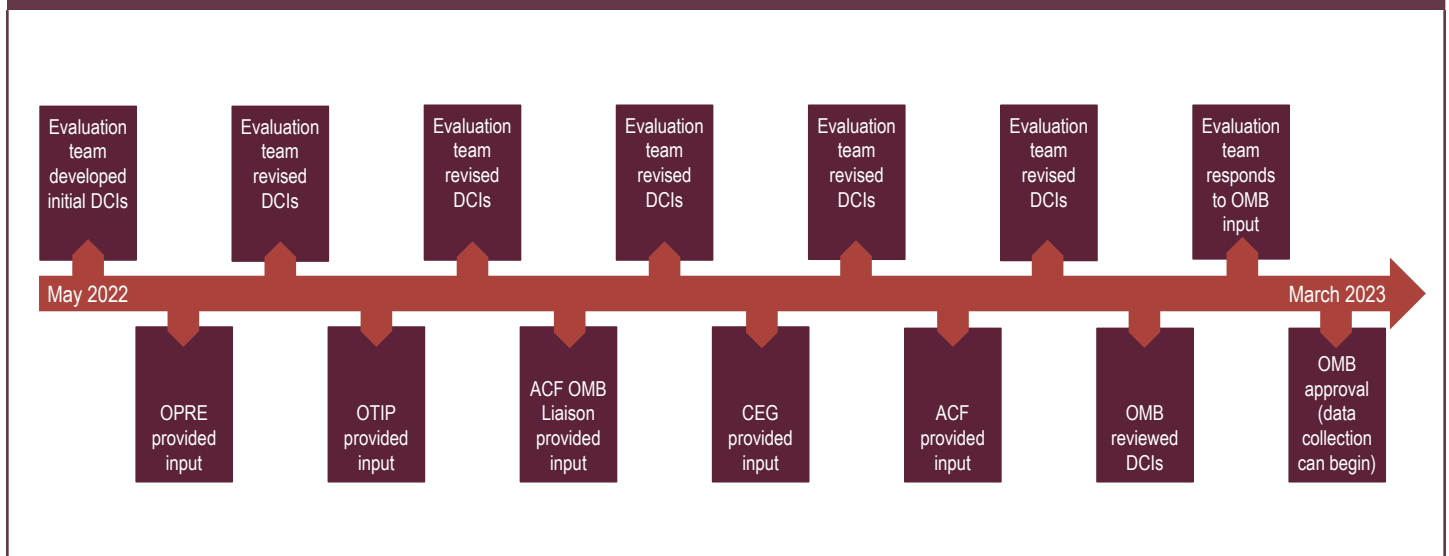| Meeting Dates	Key Agenda Items or Outcomes
March 2022	Introductions, overview of evaluation, overview of VHT-NC evaluation goals and questions, development of group norms, relationship-building activity
July 2022	Overview of each VHT-NC project by a project representative, discussion of data collection instruments for OMB submission
October 2022	Discussions around "culturally responsive" versus "culturally specific," measuring the use of culture in programming, preliminary findings from Year 1 interviews
February 2023	Discussion of additional themes from Year 1 interviews
May 2023	Joint meeting with VHT-NC project staff to provide feedback on interim report findings
October 2023	Observations from the evaluation team and group reflection and meaning-making about site visits
April 2024	Discussion about centering Indigenous context in key data points for the final report
June 2024	Review and feedback on the final report and key takeaways for project funders and communities

Evaluation Newsletter

Based on feedback from CEG members for more frequent communication, the evaluation team developed a semi-annual evaluation newsletter shared via email with the CEG, VHT-NC project staff, OPRE, and OTIP. This supported the evaluation goals to promote transparency, build capacity around evaluation and Indigenous research ethics, and support relationship building. The newsletter shared updates on evaluation progress, profiles of VHT-NC projects, and informal Q&As about CEG and evaluation team members. It also included an 'Evaluation Corner' that described or defined various evaluation practices, such as "formative evaluation" and "culturally responsive evaluation design." See **Appendix A** for example excerpts of the evaluation newsletters.

Designing Federal Evaluations Using Participatory and Indigenous Strategies

Participatory engagement approaches are closely aligned with Indigenous evaluation strategies. As such, evaluation involving Native communities ideally incorporates meaningful project and community engagement from conception to final reporting and allows for learning, reflection, and flexibility throughout. However, federal regulations, such as the Paperwork Reduction Act (PRA),[7] can be barriers to this approach. PRA compliance requires that federally sponsored data collection that involves 10 or more people must be reviewed and approved by OMB. This process often takes at least 6 months from initial submission to OMB, and once instruments are approved, revising them requires new approval, which can be another lengthy process. Although this significantly limits the ability for iterative design and responsiveness (e.g., to new information, community input, or other external input) and flexibility, it is possible to engage Tribes, Native community members, and project staff in evaluation of federal programs or initiatives. It is essential to know all required approval processes and to map them out with opportunities for project and community engagement. **Exhibit 3** provides an example of the iterative design and approval process for the evaluation's site visit data collection instruments, which required OMB approval. It is also important to be transparent with the projects and communities about the approval processes and potential limitations to the evaluation's participatory engagement.

Exhibit 3. Iterative Design and Approval Timeline for Site Visit Data Collection Instruments (DCIs)

May 2022 — March 2023

Top row: Evaluation team developed initial DCIs → Evaluation team revised DCIs → Evaluation team revised DCIs → Evaluation team revised DCIs → Evaluation team revised DCIs → Evaluation team revised DCIs → Evaluation team responds to OMB input

Bottom row: OPRE provided input → OTIP provided input → ACF OMB Liaison provided input → CEG provided input → ACF provided input → OMB reviewed DCIs → OMB approval (data collection can begin)

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[7] For more information about the PRA, see https://pra.digital.gov/.

Summary

As Native Tribes, programs, and communities develop and implement programs responsive to community issues of victimization and violence, evaluation of these programs is critical to demonstrate their effectiveness, uplift cultural healing practices and strengths, and support continual quality improvements. Evaluation of Tribal programs and with Native communities requires intentional design strategies to ensure the approaches respect Tribal data sovereignty and incorporate their traditional and contemporary knowledge, beliefs, and values through participatory and culturally responsive approaches.

The following are important considerations when planning for evaluation that involves Native communities:

◈ For non-Native organizations, partnering with Native or Indigenous organizations or consultants is a culturally responsive practice and is strongly encouraged. Non-Native evaluation team members are still responsible for knowing and understanding Indigenous and culturally responsive evaluation principles.

◈ Even if program evaluation is a required component of an award, Tribal engagement and approval (as directed by Tribal regulations) is still required before evaluation begins.

◈ Evaluation teams must be aware of other approval processes (e.g., federal agency, OMB), including timing and length, and intentionally build in opportunities for project and community engagement to continually inform the evaluation.

◈ Giving back to the projects and communities participating in the evaluation and sharing their knowledge, strengths, and gifts is critical. Doing so honors their sovereignty, time, and efforts and hopefully will help build trust and begin to right the many wrongs that have harmed Native communities in the name of research.

References

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This brief was developed as part of the formative evaluation of the VHT-NC Program. Broadly, the goals of the evaluation are to understand the context in which the VHT-NC projects are implemented, the projects' goals, and the paths they take to achieve their goals, using a participatory and culturally responsive approach.

The VHT-NC formative evaluation is part of the Human Trafficking Policy and Research Analyses Project, which aims to advance the scope of knowledge and data around human trafficking by identifying priority areas for learning, and conducting a series of studies that can immediately impact practice. All studies are overseen by the ACF Office of Planning, Research, and Evaluation (OPRE) in collaboration with OTIP, and conducted by RTI International. The VHT-NC formative evaluation is also conducted in partnership with American Indian Development Associates, LLC.

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