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Tribal Strategies Against Violence

Chickasaw Nation Case Study

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EVALUATION OF THE *TRIBAL STRATEGIES AGAINST VIOLENCE* INITIATIVE

CHICKASAW NATION CASE STUDY

1.0 INTRODUCTION

In FY 1995, the U.S. Department of Justice's Bureau of Justice Assistance (BJA) — working in conjunction with the Office of Justice Programs (OJP) American Indian and Alaska Native Desk — developed the *Tribal Strategies Against Violence* (TSAV) initiative. As a federal-tribal partnership, the TSAV initiative was designed to empower American Indian communities to improve the quality of life by fostering strategic planning to identify community problems and implement locally developed partnerships to address those problems. The ultimate purpose of the TSAV initiative was the development of comprehensive reservation-/community-wide strategies to reduce crime, violence and substance abuse.

Seven American Indian Tribes were selected to participate in this BJA demonstration program. These were: the Chickasaw Nation (Oklahoma), Duck Valley Shoshone-Paiute Tribes (Nevada), Fort Peck Assiniboine and Sioux Tribes, (Montana), Grand Traverse Band of Ottawa and Chippewa Indians (Michigan), Puyallup Tribe of Indians (Washington), Rosebud Sioux Tribe (South Dakota), and the Turtle Mountain Band of Chippewa Indians (North Dakota).

1.1 TSAV Evaluation

In July 1997, ORBIS Associates was contracted by the National Institute of Justice (NIJ), U.S. Department of Justice (DOJ) to conduct an evaluation of the TSAV initiative. Four of the seven TSAV sites were selected by BJA to be included in this evaluation study. They were as follows:

- (1) The *Fort Peck Assiniboine and Sioux Tribes*: one of the initial two pilot sites selected by BJA in FY 1995
- (2) The *Chickasaw Nation*: awarded funds under an FY 1996 competitive process
- (3) The *Turtle Mountain Band of Chippewa Indians*: awarded funds under an FY 1996 competitive process
- (4) The *Grand Traverse Band of Ottawa and Chippewa Indians*: awarded funds under an FY 1996 competitive process

ORBIS' primary evaluation tasks were to:

- document how TSAV approaches had evolved at each of the four TSAV sites;
- document how each site had implemented its comprehensive strategies;

- analyze and report how differences in local cultures, physical environments or government structures at the sites may have affected implementation at the sites and may or may not have implications for potential success of TSAV in other American Indian communities; and
- provide useful evaluation findings for tribal and DOJ decision makers as well as other criminal justice stakeholders.

This *Case Study* is one of four completed for the evaluation of the TSAV initiative. It documents the activities implemented by the Chickasaw Nation during its two TSAV grant awards and assesses the program impact at the site. Comparable case studies have also been prepared for the other three TSAV sites. Additionally, a *Cross-site Analysis Report* has been prepared, containing an analysis of TSAV program impacts across the four evaluation sites. That report also presents conclusions about the overall TSAV initiative.

1.2 Framework of TSAV Initiative

In formulating the TSAV initiative, BJA built upon the lessons learned from several past BJA-funded community-based prevention demonstration projects, i.e., the premise that (1) individual/agency actions are necessary but not sufficient to prevent crime and delinquency; and (2) by working together, people can make a difference in the quality of life for themselves, their neighborhoods, and their communities.

The planning model used by BJA for the TSAV initiative was based upon findings from several community policing demonstration projects. This planning model emphasized that:

- a multi-faceted planning team be formed;
- law enforcement and the courts can be engaged as partners;
- target area(s) be identified;
- community representatives be actively involved in the development, implementation, and monitoring of strategies for policing neighborhoods and delivery of other services; effective programs often begin with small, tangible victories and then, using the confidence gained, tackle larger issues; and
- effective programs be implemented with minimal funding generally directed toward staffing of a coordinator/community organizer, organizational overhead costs, and technical assistance.

As stated in the FY 1996 TSAV Program Announcement, the three *goals* of the Tribal Strategies Against Violence initiative were to:

Goal 1: *Improve a community's capability to comprehensively address issues of crime, violence and drug demand reduction*

Goal 2: *Promote community-based program development involving the active participation of youth, community residents, educators, spiritual leaders, businesses, social services, criminal justice representatives and elected officials*

Goal 3: *Develop an effective culturally sensitive program model that can be replicated by other Native American communities*

As identified by BJA, there were also four key local objectives for the Tribal Strategies Against Violence initiative.¹ These objectives were expected to advance individual communities towards the overall three TSAV goals cited above.

- **Establish and/or enhance a diverse planning team and build partnerships** — representative of tribal service providers (i.e., law enforcement and courts, prosecution, social services, education, etc.), spiritual leaders, businesses, community residents and youth
- **Develop and implement cost-effective crime and violence reduction strategies** (including community policing, prosecution and prevention initiatives)
- **Provide youth with alternatives** to substance abuse and gang involvement
- **Enhance local capability to identify public and private resources**

From the onset of planning for, and throughout the implementation of, this demonstration initiative BJA placed great emphasis on TSAV needing to be “a **process** not a project.” This concept was reiterated and repeatedly reinforced by both BJA staff and the staff of its TSAV technical assistance provider, the National Crime Prevention Council (NCPC). *Process, not project* was the underlying theme for much of the training provided to grantees throughout the duration of the initiative.

The Chickasaw Nation TSAV initial grant was awarded October 1, 1996. The TSAV program was initially envisioned by BJA as one 18-month program year, consisting of distinct planning and implementation phases. The planning phase was to cover the first six months, after which time each grantee was to complete its TSAV Implementation Workplan. In actuality, the planning process ended up taking approximately nine months. Each grantee was given \$30,000 for planning purposes, and was asked to organize a five-member TSAV planning team. This team was then provided training by NCPC and BJA staff. After completing its TSAV Implementation Workplan, each grantee was authorized to expend the remaining \$90,000 of grant funds to implement their crime, violence and substance abuse strategies. Although not initially part of the BJA TSAV plan, each grantee was ultimately given a second grant award, this time for 15 months and a sum of \$105,000. Because it still had funds available, the Chickasaw Nation was granted a no-cost extension through December 31, 1999.

¹ There were a total of seven objectives in the FY 96 TSAV Program Announcement; one related to provision of full-time staff to help guide the planning team in development and implementation of a Workplan; another related to provision of technical assistance to core team members by BJA. Neither of these objectives pertained directly to the content of the local programs. Another objective which related to community policing, prosecution and prevention initiatives was, for purposes of facilitating discussion of strategies in this report, subsumed under the second objective cited above.

2.0 CASE STUDY METHODOLOGY

Two ORBIS site visits were made to the Chickasaw Nation — the first in December 1997, which involved three evaluation team members, and the second in November 1999, which involved two evaluation team members. The evaluation activities undertaken for this case study included:

- (1) on-site interviews with affiliated program staff of the Chickasaw Nation, TSAV Core Team members, key municipal and Bureau of Indian Affairs (BIA) law enforcement personnel, TSAV program partners, Chickasaw Nation executive and legislative branch leaders, and other community service providers participating in the local TSAV initiative's planning and implementation;
- (2) review of program documents in BJA's own files as well as of tribal and project documents collected on site; and
- (3) a survey of local TSAV stakeholders, and
- (4) analysis of data from Chickasaw Nation BIA Agency police and State law enforcement data.

3.0 SITE HISTORY AND DESCRIPTION

3.1 Characteristics of the American Indian Tribe

The Chickasaw Nation is a federally recognized, non-reservation American Indian Tribe located in south central Oklahoma. Chickasaw Nation lands, falling under tribal or federal jurisdiction, consist of about 2,610 acres of Federal trust land and an additional 73,753 acres of individually owned allotments which form a tribally affiliated checkerboard area within the Tribe's boundaries. In various tribal documents, the Tribe notes that its service area and jurisdiction are comprised of 7,648 square-miles encompassing five counties (Carter, Garvin, Love, Marshall, and Murray) and covering portions of eight other counties (Grady, McClain, Pontotoc, Johnston, Bryan, Coal, Stephens and Jefferson). Together with the Choctaw Nation, the Tribe also jointly owns several acres of forest land administered by the BIA as part of its trust responsibilities.

The total population for the 13-county Chickasaw Nation service area is about 300,000. Chickasaw Nation tribal members account for approximately 9% of that number. Although a majority of the 35,000 enrolled Chickasaws do reside within that 13 county area, the Tribe also has a relatively large group of non-resident tribal members, many of whom have remained very active in tribal affairs.

The Tribe is currently organized into four administrative/voting districts, with tribal headquarters located in the city of Ada. The Tribe's Administrative complex there consists of offices for the Governor, Lt. Governor and various tribal programs. The Ada complex also houses the offices and chambers of the Tribal Legislature and Tribal Judiciary, as well as the museum and cultural center of the Tribe. Additionally, the Chickasaw Nation maintains regional offices in Ardmore (about 70 miles from Ada), Tishomingo (about 35 miles from Ada) and Purcell (about 52 miles from Ada). Ultimately the Chickasaw Nation hopes to have branch offices so that needed services are available, within a 35 mile drive, to all Chickasaw tribal members residing in the Tribe's service area.

Law enforcement agencies: Agencies with responsibility within the Chickasaw Nation service area include several municipal police departments; 13 county sheriffs departments; the Oklahoma State Highway Patrol; and the Chickasaw Agency BIA Police. The BIA Police have jurisdiction on all allotment trust lands within the Chickasaw Nation area.

Judicial systems: There are various judicial systems with jurisdiction within the Chickasaw Nation's 13-county service area include the respective county courts that are part of the Oklahoma State Court system; both eastern and western judicial districts of the U.S. District Court for Oklahoma and the U.S. Attorneys Offices for those judicial districts; the BIA's Chickasaw Agency Court of Indian Offenses (known as the "CFR Court") which has both criminal and civil authority on the Chickasaw Nation trust lands. An additional court system operating within the service area is the Chickasaw Nation Tribal Judiciary. This is an appeals court, of sorts, but it does not hear any individual criminal or civil cases. Rather, it focuses on reviewing the constitutionality of laws passed by the tribal Legislature.

The Chickasaw Nation is unique in several respects, when compared with the other three TSAV sites included in this evaluation study. Specifically, unlike the other TSAV sites:

- (1) The Chickasaw Nation does not have a reservation with defined boundaries within which tribal law enforcement agencies have jurisdiction or tribal legal codes apply.

- (2) Neither Chickasaws, nor Indians as a whole, represent the majority population. Rather, they represent an average of 8.2% of the population in the 13-county Chickasaw Nation service area.

The Chickasaw Nation service area is bisected (north to south) by Highway #35, a busy interstate corridor which, according to local law enforcement personnel, serves as a major drug trafficking link between Mexico and the Central Plains area. The Chickasaw Nation is, therefore, particularly vulnerable to infiltration of an illegal drug market, as well as the manufacturing of controlled substances and the gang activity which so often accompany the presence of drugs. The unfortunate impact of the Tribe's proximity to this drug traffic is reflected in recent arrest data for the area. For example, between 1990 and 1995, the Chickasaw Nation service area's arrest rates (per 1000) for drug-related crimes increased from 0 to 44.8 for Indian juveniles; from 24.6 to 35.1 for Indian adults; and from 23.1 to 35.9 for all ages of American Indians. Arrest rates for drug sales and manufacturing, in particular, rose for Indians of all ages from 2.2 to 4.6, while comparable figures for the population at large actually decreased, from 15.2 to 13.0.

In 1997, 2,047 index crimes were committed within the Tribe's service area, 40.4% of which involved juveniles. Juveniles also accounted for 15.4% of all arrests made within the service area during that year. Indians accounted for 5.9% of the violent crimes.

Approximately 21% of Chickasaw Nation families residing in the Tribe's 13-county jurisdictional area fall below the poverty level. According to the 1990 U.S. Census, the per capita income for Chickasaws was \$6,813.

3.2 Characteristics of TSAV Target Areas

The Chickasaw Nation chose to target most of its TSAV efforts on two communities in particular, namely, the city of Ada in Pontotoc County, and the town of Tishomingo in Johnston County. In the second year, Chickasaw Nation senior centers were added as target sites. These were primarily in the towns of Ada, Ardmore, Tishomingo, Sulphur and Purcell.

Census figures of 1990 placed Pontotoc County's unemployment rate at about 15%. Domestic violence among the county's Indian population was extremely high, as illustrated by the fact that while Indians represent only about 14% of the county population, they accounted for almost half of the 535 women housed in the local Battered Women's Shelter. Data on the city of Ada also reflected problems. Its poverty rate was estimated to be about 23%. In 1997, the Ada school district's dropout rate was 6.3%, the highest in the entire county. Moreover, by 1996 evidence of gang presence in the Ada area had begun to surface and juvenile crime rates were on the rise. At that same time, seniors citizens in Ada (and in Murray County) were increasingly becoming victims of crime and there were few crime prevention activities operating on their behalf. Although statistics were not available, when interviewed in December 1999, the Associate Judge at the Bureau of Indian Affairs CFR Court indicated a rise in cases dealing with Elder abuse (neglect and exploitation).

In Ada, three housing projects, Country Place, Latta (formally known as Campbell Acres) and Woodbrook were the locus of TSAV activities under the program goal dealing with gang violence reduction. The Latta (69 units) and Woodbrook (59 units) housing sites are managed by the Chickasaw Nation Housing Department and have mostly American Indian occupants, while the

Country Place site has only four Indian families. Crime rates in these housing areas had been steadily increasing in the years preceding the TSAV initiative. For example, at the Country Place housing project, between May 1993 and March 1997 there had been 135 disturbances; 41 incidents of vandalism; 30 assaults; 28 larcenies; 25 prowler/suspicious person incidents; 8 burglaries and 2 auto thefts.

Tishomingo, located in Johnston County, had originally served as the traditional capital of the Chickasaw Nation. It, too, is located in a county with a high poverty rate — 33% according to 1990 Census data. Tishomingo itself is a small rural community, with few recreational or alternative activities available for its youth. Between 1995 and 1997, the school dropout rate for Johnston County almost doubled. Incidents of child abuse and neglect were also increasing, having risen from 1.8 (per 1000) in 1985 to 21.7 (per 1000) in 1997, by then one of the highest rates in the state of Oklahoma.

4.0 PROGRAM STRUCTURE AND CHRONOLOGY

4.1 Formal Organization and Structure of the Chickasaw Nation TSAV Initiative

The Chickasaw Nation TSAV program was located within the Tribe's Department of Family Advocacy (DFA), within the Division of Education and Family Services. Program staff consisted of a TSAV Project Coordinator and a TSAV Violence Education Specialist. Until 1999, the DFA Director was directly responsible for supervision of TSAV program staff. However, early in 1999, a Violence Prevention Manager position was created within DFA and that person was given supervisory responsibility for the two TSAV staff.

Grant support for the TSAV staff positions varied over the two grant periods. During the FY 1996 grant period, BJA allowed for full funding of both positions. A contingency for the continuation grant award, however, was that the Chickasaw Nation pick up one-half of the funding for the Project Coordinator's position. The Tribe assumed this expense, using funds from its Child Abuse and Prevention budget.

In addition to the staff, the program was overseen by a Core Team, comprised of the DFA Director, the Bureau of Indian Affairs Police Supervisor, a Tribal Legislator, and the Violence Prevention Manager (who is also based in DFA).

A larger committee also met regularly. It consisted of the TSAV staff, Core Team members, and about six other individuals from various collaborating agencies. Inclusive in this group were the Administrator for the Division of Education and Family Services, the Director of the Chickasaw Nation Housing Department's Drug Elimination Program, the Director of the Ada Family Crisis Center, and the Ada City Police D.A.R.E. officer. This committee participated in TSAV activities, assisted in fund-raising activities, and provided guidance on planning and scheduling specific activities.

During the first year of implementation, TSAV Workgroups were also established to assist with, and oversee, implementation of each of the Workplan goals. Ultimately, however, because these Workgroups met irregularly, their function was by and large subsumed by the same committee of about 12 which was discussed in 4.1 above.

4.2 TSAV Planning Process for the Chickasaw Nation

When the TSAV project was first established, a group of about 30 individuals, called the Expanded Planning Group, was formally established by tribal resolution to design the first TSAV Workplan. By the second year of implementation, this group had become inactive. However, a few members of that group continued to participate on the on-going committee of 12 discussed in 4.1 above.

During the TSAV planning phase at Chickasaw Nation, Oklahoma State Bureau of Investigation (OSBI) and other data were used to identify appropriate goals for the local initiative. Of note is that two major problem areas — namely, domestic violence and substance abuse, and both of which were having serious impacts on the community — were ultimately eliminated as possible areas of pursuit as TSAV goals. Specifically, although domestic violence was seen as a major problem for the Chickasaw Nation, it was decided by the Extended Planning Group that a TSAV goal was not needed to address this issue since there were already several other resources available for that

purpose. Similarly, while recognizing the extent to which substance abuse was contributing to criminal activity in the service area, direct services for drug treatment were eliminated as a possible TSAV strategy since there were already existing HUD-funded drug-elimination programs.

Instead, the planning process at Chickasaw Nation resulted in the decision to focus the TSAV initiative on preventive services for youth. This decision to develop youth-related goals was substantiated by 1980-1990 data, for four of the counties served by the Chickasaw Nation (Grady, Garvin, Carter and Jefferson). These data showed, for example, that juvenile arrests for violent crimes had increased by 100 arrests for every 100,000 youth.

4.3 TSAV Goals and Strategies for the Chickasaw Nation

Three TSAV goals were pursued during the first year of funding. In the revised TSAV Workplan for the second year, because work toward achievement of the first goal (see below) had largely been completed, a new goal was added. That new goal addressed senior citizen victimization. The four Chickasaw Nation TSAV goals were:

Goal 1: *Develop an Alcohol Abuse Prevention Program for Young People Ages 3-10*

This goal was implemented at one specific site — namely, Tishomingo, and was largely completed during the first funding cycle. The Workplan objectives for this goal were to include gathering statistics to verify the goal’s validity; establishing a Boys and Girls Club; and increasing community awareness about alcohol abuse among the youth through community forums, presentations, media campaign and development of community partnerships.

Goal 2: *To Teach Violence Reduction Strategies to Teachers and Counselors to Effectively Deal with PreK - 7th-Grade Students*

This goal was included in the Workplans for both years of the Chickasaw Nation TSAV program, although during the first year, it was limited to only PreK- 4th grades. The Workplan objectives for this goal were to include identifying potential participating schools (and one Headstart program) and developing a Memorandum of Understanding (MOU) between those schools, police, churches and agencies; reviewing and selecting an age-appropriate student conflict resolution package; training teachers on those strategies; arranging for a law enforcement person to provide in-class instruction on the D.A.R.E. curriculum; and providing life skills training to students to build a positive self-image.

Goal 3: *Mobilize Community to Reduce Severity, Frequency and Duration of Gang-related Criminal Activities*

This goal had three targeted communities, all of which were housing additions in the city of Ada. In the first year, only Country Place housing was a focus of this TSAV goal; in the second year, Latta and Woodbrook Estates housing sites were added. Workplan objectives for this goal were to include collecting statistical data to verify the validity of the goal; conducting a survey to determine the housing residents’ needs; collecting information to profile operative gangs; increasing community awareness; planning and designing interventions, with community involvement using strategies like enforcing curfew laws,

neighborhood beautification, increased police patrols, and speed limit signs. During the second funding cycle, a specific objective for soliciting support and commitment from schools, Ada and BIA police and the tribal Housing Authority was added.

Goal 4: Develop a Plan to Reduce Criminal Victimization of the Chickasaw Nation Senior Citizens

This goal was added to the Workplan during the second TSAV funding cycle. The primary objectives for this goal were to include increase senior citizen awareness of the types of crime to which they are most vulnerable and providing self-defense classes for senior citizens. The TSAV initiative worked directly with the Chickasaw Nation Senior Citizens Centers in Ada and Sulphur. Activities under this goal were to culminate in the establishment of a TRIAD program.

4.4 Budget Information for the Chickasaw Nation TSAV Program

The Chickasaw Nation received two TSAV grant awards.

- □ The first award of \$120,000 was for an 18-month project period (October 1, 1996 - March 31, 1998). Of those funds, \$30,000 were to be used in the first 6 months for Phase 1 (diagnosing assets, obstacles and local priorities) and Phase 2 (determining a strategic plan). The remaining \$90,000 was to be used in the subsequent 12 months for Phase 3 (program implementation.) This 18-month grant ultimately received a 3-month no-cost extension through June 30, 1998.
- □ A second grant award of \$105,000 was then made for a 15-month project period (July 1, 1998 - September 30, 1999.) That grant, too, was ultimately given a no-cost extension, with the final closing date being December 31, 1999.

4.5 Site Monitoring, Reporting and Local Evaluation

TSAV grantees were not required by BJA to submit either a formative or summative evaluation plan as part of their application process. It is noted, however, that in an August 21, 1996 internal memo from DOJ TSAV program staff to the DOJ Director of BJA, the following statement was made: *The Chickasaw Nation will work with BJA, NCPC and local institutions of higher learning, as applicable, to develop an assessment tool to measure project impact.* Despite this language, however, no evidence was found of such a tool being developed; nor was there evidence, through review of either Federal or local records, that BJA ever substantially pursued this issue with the grantee.

No local evaluation was conducted of the program since none was required. It is noted, however, that ORBIS associates' *process evaluation* of the Chickasaw Nation TSAV did, to some extent, serve the purpose of an interim evaluation for the local program. The process evaluation findings and recommendations were summarized in the document, *Chickasaw Nation TSAV Evaluation Site Visit Report #1, June 1998.* Copies of that document were provided to all TSAV sites by the evaluators.

Responsibility for overall monitoring of this grant rested with BJA. This was done through regular phone contact, periodic site visits by BJA and NCPC staff, semi-annual TSAV meetings, and review of the grantee's progress reports. From October 1, 1996, through February 28, 1997, the Chickasaw Nation reports were generally submitted to BJA on a weekly basis. BJA then changed its required submission timeframes to be quarterly and, for the most part, Chickasaw Nation complied with that requirement. During the last year of TSAV funding, Chickasaw Nation's reports were semi-annual, in accordance with BJA's again revised submission schedules.

5.0 IMPLEMENTATION OF LOCAL TSAV STRATEGIES

5.1 Approach to Alcohol Abuse Prevention for Youth in Tishomingo

Chickasaw Nation TSAV strategies related to alcohol abuse and prevention for youth were undertaken in association with the FY 1996 Workplan goal to *Develop an Alcohol Abuse Prevention Program for Young People Ages 3-10 in Tishomingo*. The TSAV Workplan cited 1995 Oklahoma State Bureau of Investigation statistics indicating that statewide:

- □ “Indian youth, who represent 10 percent of the state’s juvenile population, were involved in 22 percent of incidents of drunkenness . . . [and for] all other categories related to illegal substance use, possession or distribution, Indian juveniles accounted for less than 10% of actual arrests.”
- □ “for every year since 1985, alcohol-related arrests *for all juveniles* . . . have significantly exceeded arrests for other drug-related crimes” [emphasis added].

It was the intent of the Chickasaw Nation TSAV partners to gather existing data/statistics on incidents of alcohol abuse among youth in order “to determine the validity of the goal.” While these data were never collected, anecdotal information from persons interviewed on site indicated that alcohol and other drug abuse remained a problem within the Tribe’s service population.

Strategies undertaken to address this problem included increasing awareness about alcohol abuse among youth through coordination with the Ada City Police’s D.A.R.E. officer, and having the BIA Police Supervisor make McGruff and Scruff presentations to local schools and youth groups. The ultimate targeted result under this approach was the establishment of a Boys and Girls Club in Tishomingo. Most of the work toward this target was completed in the first year of the program. The *Chickasaw Nation Boys and Girls Club in Tishomingo* opened on May 24, 1999. [Note: the city of Ada also has a Boys and Girls Club, not affiliated with the Chickasaw Nation.]

The Tishomingo Boys and Girls Club is located on the Murray State College campus. The Club is staffed by a full time Director who is a Chickasaw Nation member. Additional staff during the summer include a part-time Joint Training Partnership Act (JTPA) worker, three Summer Youth Program workers and a workstudy student from the college. The Tribe’s Youth Services Specialist responsible for the Chickasaw Nation Youth Council is also located in the facility.

The focus of the Boys and Girls Clubs is alcohol abuse prevention and provision of alternative youth activities. In November 1999, there were 220 members in the Club, with about 60% of them being American Indian and a 55%:45% ratio of girls to boys. The membership included youth from 6-12 years of age. The Club staff noted to the evaluators that they intended to do more outreach to teenagers.

Administrative oversight of the Tishomingo Boys and Girls club operation rests with the Tribe’s Youth Services Program. Chartered under the state of Oklahoma, the Club initially received a \$50,000 start-up grant from the Boys and Girls Clubs of America, Inc. (BGCA) in order to open the facility. That funding ended in June 1999, and a continuation grant of \$25,000 was then provided by BGCA.

The Board of the Tishomingo Boys and Girls Club board is composed of community members, including two tribal program administrators (the Director of Youth Services and the Director of the Education Department); a local pastor (who is Chickasaw); the owner of the local newspaper; a local businessman; a highway patrolman; and a community member from Sulphur. One of these Board members is also on the Chickasaw Nation TSAV Planning Committee. This Board is responsible for raising funds for the continued operation of the Club. As of November 1999, it had requested \$45,000 from the Chickasaw Nation Legislature to hire an additional staff person.

5.2 Approach to Violence Reduction in Schools

Chickasaw Nation TSAV strategies regarding violence reduction in schools were cited under the FY 1996 TSAV Workplan goal entitled *To Teach Violence Reduction Strategies to Teachers and Counselors to Effectively Deal with PreK - 7th-Grade Students*. In the first TSAV funding cycle, this goal applied only to PreK - 4th-grade students; it was, however, expanded in the second year to include grades 5-7 students. It is noteworthy that the Chickasaw Nation TSAV Workplan did not cite any specific Chickasaw or local data regarding local child-to-child violence. Rather, as documentation, it cited the Child Witness to Violence Project at the Boston [Massachusetts] City Hospital and “disturbing increases in the incidence of child-to-child violence.”

During the first grant year, the primary strategy undertaken was to implement an “age-appropriate conflict resolution” curriculum in the Ada City Public Schools. To accommodate this objective, one TSAV staff member was trained in the Second Step Conflict Resolution Curriculum in order to then train local school staff.

TSAV staff were not ultimately as successful as they had hoped with respect to gaining substantive involvement of the Ada City Public Schools as an active partner in reducing school violence. This was despite the fact that two principals were of Chickasaw heritage. By the end of the first grant period, training on the Second Step curriculum had only been provided to “dorm parents” at the Carter Seminary, a Chickasaw Nation-operated dormitory in Ardmore. No public school had received the training during the first year. By the end of second year, two elementary schools in Ada had permitted the TSAV Violence Education Specialist to conduct presentations at the schools and distribute conflict resolution materials. These presentations were limited to half-day presentations, and were each made only once — as part of the fall teacher in-service programs. Sixty staff participated at one school, 30 at the other. Informational packets containing classroom activities were distributed to the preschool and K-5 teachers and other school staff. Unfortunately, since the first TSAV Coordinator took the Second Step curriculum materials with her when she departed. Thus, the replacement TSAV staff no longer had the benefit of those materials and, instead, had only assorted conflict resolution handouts, activity sheets, etc., provided by the National Crime Prevention Council to distribute to school participants.

Throughout the life of the TSAV funding, problems remained with respect to gaining entry into a broader array of Ada elementary and middle schools. While two additional schools had initially been approached as potential participants, neither ultimately chose to participate — one school did not feel that it had any problems with child-on-child violence, and the other school had apparently initiated its own conflict resolution program. Even the local alternative school was approached by the Chickasaw Nation, since its targeted population is at-risk students (i.e., those who get in trouble at the regular schools). There, too, the administration indicated no need for the training, citing that there had not been any fights that year.

As of November 1999, TSAV staff had conducted no monitoring or follow-up with either the Carter Seminary staff or the staff at the two public schools which had received training. TSAV staff did, however, indicate to the evaluators that they intended to return to the two participating public schools during the Spring 2000 semester to provide follow-up teacher training. No follow-up had yet been planned for staff of the Carter Seminary dormitory.

5.3 Approach to Reduction of Gang-related Criminal Activities

Chickasaw Nation TSAV strategies related to reduction in gang-related criminal activities were pursued under the Workplan goal to *Mobilize Community to Reduce Severity, Frequency and Duration of Gang-related Criminal Activities*. Over the course of the TSAV program at Chickasaw Nation, three housing sites, namely Country Place, Latta and Woodbrook, were made target communities for this goal.

As statistical support for this goal, the initial TSAV Workplan at Chickasaw Nation:

- □ cited Ada City Police statistics from May 1993 to March 1997 relating to the Country Place housing site; these incident reports included “disturbances (135), vandalism (41), assaults (30), larceny (28), prowler/suspected person (25), burglaries (8), and motor vehicle theft (2).”
- □ noted that 35 surveys had been collected from Country Place residents and that those surveys documented a need for “more police patrol, enforcing the curfew law, Block Watch, neighborhood beautification, speed limit signs, and display Children-At-Play signs.”

The Chickasaw Nation Workplans for both TSAV funding cycles stated the intention of “determining the validity of the goal,” by: (a) gathering existing data/statistics on incidents of gang-related criminal activities in the targeted housing sites and (b) conducting surveys of targeted sites’ residents “to discern [their] needs.” Although as evaluators we found no evidence that either of these data collection activities ever occurred, the local TSAV planning team determined that there was sufficient anecdotal information to substantiate the need to expand TSAV’s initial crime-reduction activities at Country Place into two additional Chickasaw Nation housing sites.

This TSAV goal was coordinated with the Chickasaw Nation’s Housing Department’s Drug Elimination Program (DEP) as well as with Ada City Police and BIA law enforcement. TSAV staff participated in monthly community meetings at these sites and provided 80 hours of community policing training to DEP staff and housing residents. Strategies included implementation of Neighborhood Watches, phone trees, graffiti paint-outs, and installation of speed-limit signs and speed bumps in the housing areas. Additionally, at Country Place housing, TSAV staff worked with Ada City Police to initiate a bicycle patrol and stricter enforcement of curfew laws.

At the Latta and Woodbrook housing sites, drug elimination program funds were used to hire an armed/uniformed security company to monitor the housing sites and to equip that personnel with both a vehicle and radio which was monitored by both BIA and local police agencies. Staff of this security company was authorized to make citizens’ arrests — stop and holds — for BIA police. Those cases were then prosecuted through the BIA’s CFR Court.

One additional strategy under this goal was to use the services of a consultant who had expertise on gangs in Indian Country. This individual conducted a two-day workshop designed for four specific

local audiences: law enforcement agents, at-risk youth, school teachers and counselors, and community members in general.

5.4 Approach to Reducing Criminal Victimization of Senior Citizens

Chickasaw Nation TSAV strategies to reduce criminal victimization of senior citizens were pursued under the Workplan goal to *Develop a Plan to Reduce Criminal Victimization of the Chickasaw Nation Senior Citizens*. This was a goal added during the second TSAV funding cycle. Of note is that the Chickasaw Nation Workplan had not cited any statistics to verify that this issue was, in fact, a problem. Rather, the Workplan identified, as an objective, the intention of gathering data/statistics on incidents of crimes against the elderly in order “to determine [the] validity of the goal.” The evaluators were told that, as follow-up to this objective, each Chickasaw Nation senior center conducted a survey of its senior citizens. The survey format was copied from the TRIAD Program manual. Presumably the outcome of these surveys substantiated the need for adding this particular goal to the Chickasaw Nation Workplan. However, no survey findings were made available to the evaluation team, so we cannot confirm survey results.

The evaluation team was, nevertheless, able to collect qualitative data which supported inclusion of this goal in the Workplan. During the November 1999 site visit, TSAV planning team interviewees stated that exploitation of senior citizens was a serious problem in the community. It was further stated that 99% of the perpetrators were family members. Alcohol and other drug abuse were identified as primary co-factors to elderly abuse. Interviewees stated that one elder’s home had been turned into an active methamphetamine manufacturing and sales house. They further noted that a common exploitation tactic was to get elders to co-sign loans — cash from which was then subsequently used for purchasing drugs. The loans were then defaulted on, leaving the senior citizen responsible for payments. Other senior citizen exploitation problems that were noted related to fraud, such as extracting fake charitable solicitations and unnecessary or overly expensive home repairs. Homes of the elderly has also apparently been specifically targeted for graffiti.

Interviewees felt that, as a whole, the community denied existence of senior abuse, unless some drastic event occurred like hospitalization of a victim. Only then were victim support agencies usually notified and asked to become involved. The BIA Police Supervisor stated that locally, in 1999, there had been two federal cases of Senior Citizen exploitation (both involved physical abuse resulting in hospitalization) — one case had been referred by a CFR worker, and the other by the local Indian Health Service (IHS) Hospital.

TSAV strategies for reducing criminal violence on senior citizens were ultimately to have resulted in implementation of a TRIAD program at Chickasaw Nation. This did not, however, occur. What did occur, instead, were two Senior Citizens Safety Walks — one in Ada and another in Sulphur — involving people from all 13 of the Chickasaw Nation’s Senior sites; and presentations by the TSAV Project Coordinator notifying elders at the senior Centers about the types of fraud schemes they should be particularly alert to. While self-defense classes for senior citizens had initially been planned, ultimately these classes were directed at women in general — not just seniors.

5.5 Extent to Which BJA's Objectives for TSAV Were Addressed

As noted in the introduction to this Case Study, BJA's *Tribal Strategies Against Violence* initiative was to help Native American communities address four key local objectives. Each of these objectives is addressed below, as is the extent to which the evaluators found evidence that the objectives had been addressed at the Chickasaw Nation.

1. **Establish and/or enhance a diverse planning team and build partnerships** — representative of tribal service providers (i.e., law enforcement and courts, prosecution, social services, education, etc.), spiritual leaders, businesses, community residents and youth

At Chickasaw Nation, a variety of tribal service providers as well as non-tribal entities participated in TSAV. Of note is that the degree to which non-tribal entities were involved at Chickasaw was far greater than at any of the other TSAV evaluation sites.

The BIA Police Supervisor, the Director of the Department of Family Advocacy, one Tribal Legislator, and the tribal Director of Violence Prevention Programs all remained active members of the Core/Planning Team for the duration of the local TSAV initiative. The Tribe's Drug Elimination Program head also played an important role on the Team mid-way into the program. Moreover, an even broader array of partners (including many non-tribal) were involved in periodic planning and implementation of activities under various goal areas. These included Ada City Police officers as well as BIA Police officers, Youth Services program staff, local charitable organizations, local businesses, and university students. The Chickasaw Boys and Girls Club is illustrative of the diversity in community partnerships. First, the Club itself was housed on the campus of a state college, thus tapping into that academic setting and its various players. Secondly, a local pastor, newspaper owner, and business man all sat on the Club's board of directors.

While some effort was made to involve local schools, for reasons discussed elsewhere in this report, that participation was ultimately more limited than hoped for. The absence of any court-related participants was, in large part, due to the fact that the judges and prosecutor for the local "CFR Court" are itinerant positions staffed by individuals who do not live in the community.

2. **Develop and implement cost-effective crime and violence strategies** (including community policing, prosecution and prevention initiatives)

For the most part, Chickasaw Nation's TSAV efforts undertook short-term (and perhaps intermediate-term) rather than long-term strategies for addressing the Tribe's crime, violence and substance-abuse prevention goals. These efforts had varying degrees of success.

Through establishment of its Boys and Girls Club at Tishomingo, the Chickasaw Nation is providing healthy alternative activities to youth who did not previously have comparable opportunities available. It is hoped that this Club, and in particular its substance-abuse awareness/education activities, will result in decreased substance abuse — now and after the youth have become adults.

Similarly, there is evidence that the efforts among Department of Family Advocacy staff, local law enforcement agencies, and the Drug Elimination Program to collaboratively stem criminal activities in the housing sites has already had some positive effects toward reducing crime. Based on the statements of TSAV partners, increased collaboration with community policing efforts of partner municipal law enforcement agencies at those sites has helped to lesson criminal activities. Furthermore, the lessening of graffiti vandalism in those sites is encouraging and it is hoped that continued monitoring of the presence of gang activity there will enable the communities to even further reduce criminal activity.

The Drug Elimination Program has made substantial improvements to the social structures within the targeted housing sites of Latta and Woodbrook. This had been in place before TSAV and a community policing initiative (e.g., Operation Pride and Protect) was just beginning in Ada at the time TSAV was starting at Chickasaw Nation. The extent to which these collaborations would have occurred anyway, had TSAV not been implemented, is not really known.

As noted elsewhere in this report, the goals aimed at implementing conflict resolution education in the schools and at reducing criminal victimization of the elderly were not that successful. Nevertheless, at the local level these efforts were considered successful enough — or at least promising enough — to continue to try to fully implement them after TSAV funding ended. However, in the absence of any formal agreements — such as Memoranda of Understanding (MOUs) or Memoranda of Agreement (MOAs), there is no evidence that implementation of these activities represents “initiatives put in place” by the Tribe.

3. **Provide youth with alternatives** to substance abuse and gang involvement

As stated above, the Chickasaw Nation Boys and Girls Club at Tishomingo is providing healthy alternative activities for Tishomingo Youth. However, we note that TSAV partners stated that it was not likely that similar programs would be established in the other communities served by the Chickasaw Nation.

4. **Enhance local capability to identify public and private resources**

During the course of its TSAV funding, the Chickasaw Nation generated \$50,000 in start-up funding for its Boys and Girls Club and an additional \$25,000 in continuation funds for the Club. As a result of Chickasaw partners’ involvement with the local TSAV initiative, and thus exposure to new information about potential grant programs — Federal in particular — numerous other potential funding resources had also been identified. For example, the Chickasaw Nation had obtained DOJ funds to support a new Domestic Violence Shelter in Ada — to serve both American Indian and non-Indian victims. Other DOJ funding was also being sought for a Youth Violence Prevention program. Final funding decisions about the latter grant, as well as about several other pending tribal applications, had not yet been made when the local TSAV program ended.

6.0 TRANSFORMATIONS AS A RESULT OF TSAV

As several criminal justice researchers predicted at the onset of the TSAV initiative, there is, thus far, little or no statistical evidence documenting TSAV's impact on crime or violence. (Refer to Section 6.3 for discussion of the statistical data that is available.) In the absence of much quantitative data, qualitative data were relied on for the most part to assess what transformations, at the community level, may have occurred as a result of TSAV. There were two sources for that qualitative data: (1) interview data collected during the last site visit to Chickasaw Nation and (2) survey data collected as Chickasaw Nation was closing its TSAV grant. Each is discussed separately below.

6.1 Interview Data

During the final evaluation site visit to the Chickasaw Nation, local TSAV Core Team members were asked to provide their assessments of the effect that TSAV had had on the Chickasaw Nation and participating local communities. Listed below are the primary changes in the community which Team members attributed to their TSAV initiative.

- The establishment of the Boys and Girls Club was cited by many interviewees as a major accomplishment of the Chickasaw Nation TSAV initiative.
- Increased collaboration and interaction among the Tribe and local agencies and organizations in the community were attributed to the existence of TSAV. Specifically, Core Team members cited that Ada City law enforcement and the Tribe were working more closely. They also noted that the Tribe and civic organizations — such as the Kiwanis Club and the local Women's Club — had developed a more sound relationship, especially through activities like the graffiti paint-outs and other joint volunteer efforts. Core Team members noted that “a lot of doors have been opened.”
- Although shortcomings were cited with respect to getting Ada Public Schools to participate in TSAV, Core Team members felt that some degree of a relationship had been initiated and that “things are starting to happen with the schools.”
- Interviewees felt that TSAV had increased non-Indian community awareness of the Chickasaw Nation and its tribal members; this had occurred as a result of TSAV staff presentations as well as joint citizen participation in activities such as HOOPS, paint-outs, etc.
- More control of gang activities and reduction in gang presence were attributed to the TSAV-initiated increase in security at housing sites and activities like paint-outs.
- Increased community awareness of the need for substance abuse prevention programming and resultant programs were also attributed to TSAV efforts. It was noted that, in general, non-Indian/Indian community relations and interactions had increased. Before TSAV, while some cooperation had existed between BIA and Ada Police, the community itself had not been involved. Now it is seen as more active and participatory.
- An improved sense of “empowerment [in the community] to be imaginative and to grow in areas we wanted to go in” was also cited as a TSAV accomplishment. Core Team members noted that they now feel that community members, like those in the housing sites, perceive themselves as “more empowered” as a result of the community policing efforts like Neighborhood Watch, etc.

Core Team members also felt that certain programs and activities which now operate within the community were attributable to TSAV, despite the fact that those programs and activities were not

specifically associated with the TSAV Workplan nor necessarily a result of TSAV-specific activities. Interviewees stated that through Core Team members' participation at TSAV workshops they had become aware of, and successfully pursued, certain new resources and collaborative opportunities. Specifically:

- □ The local health facilities, owned and operated by the Tribe, are now training nurses in conducting exams of rape victims. This, too, was attributed to TSAV since it was from DOJ staff that Core Team members received with rape examination information which were then used to initiate this new strategy.
- □ Increased tribal interagency collaboration regarding the issue of domestic violence was attributed to participation in TSAV — i.e., the new tribal Office of Violence Prevention and the Chickasaw Nation Legislature's initiative on domestic violence prevention and intervention, with a specific cultural overlay.

6.2 Survey Data

During the summer and fall of 1999, as TSAV programs began to close their projects, a survey was conducted of TSAV Core Team members and other stakeholders. The survey design was modeled after a survey used in the evaluation of DOJ's *Comprehensive Communities Program*. [A copy of the survey is attached.] The objective of the survey was to gauge TSAV stakeholders' perceptions about:

- (1) what the serious crime, violence and quality of life issues were in the community and the extent to which the local TSAV initiative had addressed those issues;
- (2) the intent and ultimate outcomes of the TSAV program;
- (3) obstacles to successful implementation of TSAV activities;
- (4) decision-making processes utilized in planning and implementing TSAV locally; and
- (5) which local partners had, or had not, been involved in the TSAV initiative and reasons for any non-involvement of potentially key players.

It should be noted that there were some problems in getting respondents to fully complete the survey. This was particularly true with respect to survey items #8-12 which related to *partnership involvement* (#5 in the above listing.). Due to the low level of completion on those items, no analysis of responses is included for that topic in the survey discussion below.

Twenty-three (23) persons were identified by the TSAV Core Team as being stakeholders in the Chickasaw Nation TSAV initiative. These individuals, some of whom were on the Core Team, included TSAV staff, other DFA staff, representatives of the BIA CFR Court, local and BIA law enforcement representatives, representatives of municipal and BIA health and social services agencies, public school representatives, other tribal programs staff (housing, education, substance abuse, etc.). Each of these 23 individuals was asked to complete the survey. Of those 23, 18 returned their survey forms.

Effectiveness in Addressing Local Concerns. Survey respondents were asked how effective they thought TSAV had been in addressing certain local concerns. Areas about which respondents felt TSAV had been most effective were:

- building community awareness about violence,

- generating community involvement,
- planning specific programs for dealing with crime and violence, and
- improving services among partner agencies.

These responses bolster the evaluators' own findings that the TSAV initiative has laid a good foundation for building an informal coalition of individuals from various Chickasaw Nation programs and local municipal agencies — such as the police. By the end of the TSAV grant, many partner entities had seen the value in continuing numerous activities that had been initiated by TSAV — such as the graffiti paint-outs, the safety runs/walks, etc.

The concerns about which TSAV were seen as having been least effective were:

- reducing drunk driving,
- reducing drug use,
- improving community policing, and
- reducing gang activity.

These responses indicate that the TSAV partners recognize that they have only begun to scratch the surface with respect to tackling certain problems facing the Chickasaw Nation community. The issues of drug use and gang activity illustrate these circumstances. As was also stated frankly by the DFA Director, TSAV focused on gang prevention efforts, rather than gang intervention strategies, because “we’re not ready to do that, and may never be.” Thus, at the end of the program, some of the more serious problems in the Ardmore housing sites had not yet been substantively addressed. The uniformed and armed security services of the Drug Elimination Program had, however, been implemented in the housing sites. Additionally, the evaluators were told that effort was being made to identify funding so as to be able to extend activities like the Neighborhood Watch into additional housing sites.

Remaining Adult Crime and Violence Issues. Survey respondents were asked what they regarded as the single most serious *adult* crime/violence problem still facing the Chickasaw Nation community at the conclusion of the TSAV program. They were also asked the extent to which they thought those problems were being addressed. Nine of the respondents identified alcohol abuse as being the most serious problem still facing the community. Most of those respondents indicated that they thought the issue was being addressed by some program or resource. Four respondents felt that use of illegal drugs was the most serious problem. Three of those respondents indicated the problem was being addressed.² It should be noted that addressing these particular problems had not been a direct focus of the Chickasaw Nation TSAV program, since those problems were seen as already being addressed by other tribal or community agencies.

The only survey item choice that no respondent viewed as still being a serious problem was *adult* gangs. Whether the TSAV program activities — e.g., community awareness presentations, gang prevention presentations to youth, graffiti paint-outs, etc. — had a direct impact on this perception is uncertain, particularly given the ambiguity of attitudes concerning the seriousness of youth gangs as a problem (see next paragraph).

² To a lesser extent, the following problems were seen as being still existent in the Chickasaw Nation. In descending order of perceived seriousness, these were drunk driving and traffic accidents, child neglect, child sex abuse, family violence, illegal drug dealing, child abuse, property crimes other than theft, sexual assault, and theft.

Remaining Juvenile Crime Issues. Illegal drug use by youth and underage drinking were rated cumulatively by all respondents as the most serious *juvenile* problems still facing the community.³ Most respondents also felt these problems were being addressed locally (not necessarily by TSAV). In addition, each of three respondents specifically identified family violence and youth gangs, respectively, as the most serious problems associated with juveniles. As a whole, however, when all partners' responses are considered in answer to the question of whether juvenile gangs were "no problem," "some problem" or a "big problem" facing the Chickasaw Nation community, juvenile gang concerns were rated the lowest. This discrepancy in perception regarding the seriousness of juvenile gangs, may stem from their having indeed been a problem earlier, but that now, at least according to BIA police, the operative youth gangs have largely been inactivated by local policing efforts. Furthermore, this discrepancy seems to verify the uncertainty of the local TSAV partners in amassing enough evidence to substantiate youth gangs as a local problem.

Quality of Life. Cumulatively, poverty was rated the highest in terms of what major quality of life issues still faced the community. Along with this the high youth drop-out rate and low educational achievement rates were cited as the next most serious problems affecting quality of life, obviously affecting poverty. When asked to state what was the one most serious problem, respondents were split between unemployment (N=5), poverty (N=4), and low educational achievement (N=3). Most felt poverty and low educational achievement was being addressed, but were split evenly as to whether unemployment was being addressed.

Expectations of TSAV Impact. TSAV partners were also surveyed about the extent to which the TSAV program had met their expectations — in terms of impact on crime, violence and substance abuse in the community. Cumulatively, the responses indicated that the TSAV program had met their expectations "somewhat more than expected." Only one individual noted that the program's impact was "less than expected."

Obstacles to Implementation. The survey also asked respondents about obstacles to successful implementation of their local TSAV initiative. At the Chickasaw Nation, the five most serious obstacles identified related to the ability to:

- TSAV staff/partner turnover,
- get partners to adhere to responsibilities in Workplan,
- find funds for activities that were planned as part of the TSAV Workplan,
- deal with changes in tribal governmental leadership, and
- get partners to think beyond their own areas of focus and view problems across turf lines.

What could have been done differently. When asked to identify what they might have done differently in implementing the TSAV program, the Core Team responses provide good insight into lessons learned. The TSAV staff specifically responded indicated that they would have followed the TSAV Workplan more closely, noting that they should probably have asked for a copy of it and other documents earlier than they did. (That remark being in reference to the previous Director having taken all TSAV documents with her when she left, leaving few if any files for the new incoming staff.) Other team members noted that they could have solicited more community

³ To a lesser extent, the following problems were noted as still existent in the community. In descending order of perceived seriousness, these were curfew violations, theft, vandalism, child sex abuse, drunk driving, and child abuse.

involvement (including more tribal government involvement). Other respondents responded saying that they could have started the TSAV process with fewer, but more concise, and clearer goals — as one individual noted, a “more concrete plan of action.”

One Core Team member noted that it would probably have been advantageous to have had more people involved during the implementation, not just the planning, process. Another stated it would have been better to get “more commitment from team players before implementing.” These statements reflect the fact that there was an initial TSAV planning group of approximately 35 individuals (including Core Team and TSAV staff); but when they shifted from the planning phase to the implementation phase, commitment from partners waned.

Despite these reservations about involvement of partners, when asked about any conflicts among partners that might have affected their decision-making, the vast majority indicated that little or no conflict had occurred. The few instances of conflict which were mentioned, were also credited for having ultimately improved the decision-making process, rather than impeding it. One individual cited the local schools as being a source of “a lot of conflict that impeded decision-making.”

6.3 Crime Data

Specific and reliable crime statistics specific to the TSAV target sites and strategies — e.g., gang-related criminal activity — were not attainable by the evaluation team. Nor were other comparison data on crime or violence incidence rates from the beginning of the Chickasaw Nation TSAV program (October 1996) to the end of the program (December 1999) available to the evaluators.

However, juvenile and adult arrests comparison data — for the period 1996-1998 — were obtained. These data from the *Uniform Crime Reports 1995-1998, Oklahoma State Bureau of Investigation* (OSBI) are discussed on the next two pages. These data were obtained from the Chickasaw Nation Department of Planning and Statistics which had begun collecting data from various sources to aid its planning efforts. However, these data, while addressing the 13-county Chickasaw Nation service area, were for the population at-large, and not Chickasaw or Indian specific.

It should be noted also that because these data represent the broad 13-county Chickasaw Nation service area, in contrast to the TSAV target sites which were specific housing areas or specific populations in small towns (e.g., youth and senior citizens), the data present no useful value for assessing the impact of TSAV strategies. Given that statistical data specific to the targeted sites does not exist, the OSBI data on the next pages are included here because they represent the only statistical crime data available.

Table 1. Juvenile Arrests By Categories

Categories	1996	1997	% Change	1998	% Change	% Change 1996-1998
Total	2,449	2,654	8.4%	2,674	0.8%	9.2%
Index Crimes	804	828	3.0%	755	-8.8%	-6.1%
Drug Related	136	175	28.7%	177	1.1%	30.1%
Alcohol Related	255	265	3.5%	312	18.2%	22.4%

Among juveniles in the Chickasaw Nation service area, total arrests increased by 9.2% from 1996 to 1998. For that same period, index crime offenses decreased by 6.1% for juveniles. Drug-related and alcohol-related juvenile arrests increased within that period at the rates of 30.1% and 22.4%, respectively.

For the reasons noted in the beginning of this section, it should be remembered that any observed changes in *juvenile* arrest rates in the Chickasaw Nation service area for the period 1996-1998 are likely to reflect factors other than TSAV activities. Since no strategies were specifically directed at interventions in juvenile crime or violence, except for the addition of security in the three housing sites, it would be difficult to attribute any changes to specific TSAV activities.

Table 2. Adult Arrests By Categories

Categories	1996	1997	% Change	1998	% Change	% Change 1996-1998
Total	14,487	14,610	0.8%	14,966	2.4%	3.3%
Index Crimes	1,415	1,219	-13.9%	1,375	12.8%	-2.8%
Drug Related	1,438	1,814	26.1%	1,973	8.8%	37.2%
Alcohol Related	6,744	6,819	1.1%	6,490	-4.8%	-3.8%

Among adults in the Chickasaw Nation service area, total arrests increased by 3.3% from 1996 to 1998. For that same period, index crime offenses among adults decreased by 2.8%. Alcohol-related arrests also decreased by 3.8%. However, the number of drug-related offenses among adults increased by 37.2%.

Because of the caveats discussed in the beginning of this section, it should be remembered that any changes in *adult* arrest rates in the Chickasaw Nation service area for the period 1996-1998 are likely to reflect factors other than TSAV activities. With the exception of armed security added to the three housing sites, since no other strategies were specifically directed at interdiction of adult crime or violence, it is difficult to attribute any changes to specific TSAV activities.

Table 3. All Ages Arrests By Categories

Categories	1996	1997	% Change	1998	% Change	% Change 1996-1998
Total	16,936	17,264	1.9%	17,640	2.2%	4.2%
Index Crimes	2,219	2,047	-7.8%	2,130	4.1%	-4.0%
Drug Related	1,574	1,989	26.4%	2,150	8.1%	36.6%
Alcohol Related	6,999	7,083	1.2%	6,802	-4.0%	-2.8%

The total number of arrests in the Chickasaw Nation service area increased by 4.2% from 1996 to 1998. For that same period, index crime offenses and alcohol-related offenses both decreased by

4% and 2.8%, respectively. The greatest increase was in drug-related offenses which increased within that period by 36.6%.

As noted elsewhere, it should be remembered that any observed changes in the *total* arrests rates in the 13-county Chickasaw Nation service area for the period 1996-1998 are likely to reflect factors other than TSAV activities.

We note that total Index Crime statistics for each of the 13 counties were also obtained. However, there were no significant changes reflected in index crime rates for the two counties in which targeted sites were located.

In the absence of reliable and valid statistical impact data, interview data did elicit some comments about perceived impacts on crime and violence at Chickasaw Nation. In December 1999, the Drug Elimination Program Director stated that, as a result of instigating the security program, crime (alcohol infractions, graffiti, gang-related incidents, etc.) had been reduced by 75%. (No statistics were provided to substantiate that statement.) Additionally, according to the BIA Police, the number of gangs in Ada had been reduced and only the Native Kings (a.k.a. Native Mob) remained operative in the housing areas. Other interviewees stated that while housing residents continued to be “hit” by Native Kings’ gang graffiti, the absence of identifying graffiti from other gangs (such as the Crips — whose local leadership had been incarcerated) indicated that gangs, other than the Native Kings, no longer operated in Ada. The BIA police stated that as of December 1999, six Crips Gang members involved in drive-by shootings had been arrested and/or incarcerated and one of those members had subsequently been killed in prison.

7.0 IMPLEMENTATION ISSUES AND INTERPRETATION

7.1 Site-specific Factors that Facilitated Implementation of TSAV

The TSAV initiative at Chickasaw Nation was facilitated — at least for programmatic matters — by having strong support from both the Chickasaw Nation Executive Branch and the Chickasaw Nation Legislature. The Executive Branch provided half the salary of the TSAV Project Coordinator during the second year, and according to interviewees also augmented both TSAV staff members' salaries with tribal funds. Further, it was the evaluators' understanding that the Executive Branch had agreed to keep both staff members on the payroll after TSAV funding had ended. Support of the Legislature was reflected by participation of three tribal legislators in the TSAV training workshops sponsored by BJA and NCPC. Moreover, one legislator was consistently active on the Core and Planning Teams. Interviewed during the final evaluation site visit, this individual stated that as far as TSAV was concerned, "I don't see the process going away, don't see the door closing" on the violence-reduction and awareness-building activities that were initiated through the TSAV program.

7.2 Site-specific Factors that Inhibited Implementation of TSAV

There were several factors that the evaluators believe negatively affected implementation of the Chickasaw Nation TSAV initiative. These factors either set back the schedule for implementation of planned activities or prevented successful completion of a particular goal/approach. Specifically:

- (a) *Absence of sufficient community-specific data.* The Tribe's lack of Chickasaw — or even Indian — specific data was problematic from the onset of Chickasaw involvement with the TSAV initiative. To begin with, this lack of Indian-specific data presented certain problems with respect to the site's TSAV goal setting. Recognizing this shortcoming, the Tribe's initial TSAV Workplan included, under most goals, the *intention of* generating statistics "to validate the goal." [In most instances, it appears that this generation of statistics did not ultimately occur.]

Furthermore, because the Chickasaw Nation operates without a specific geographic base and in non-Chickasaw-specific communities (or even majority Chickasaw Nation communities), strategies developed under the TSAV initiative had to address the broader community at large, including non-Indians and members of other Tribes. Lacking its own tribal police and a tribal court system with criminal and civil jurisdiction, the Chickasaw Nation is unable to obtain tribal-specific law enforcement or adjudication data. Thus, it must coordinate with other jurisdictions (e.g., municipal and BIA police) to obtain whatever data are available which may or may not relate to Chickasaw-specific criminal behavior. To date, the Chickasaw Nation's Planning and Statistics Department has used OSBI data specific to the Tribe's service area; but these data still are not specific to Chickasaw Nation membership.

For reasons discussed above, it was virtually impossible for the Tribe to measure the extent to which its own tribal members benefitted from TSAV. In fact, the overall evaluability of the Chickasaw Nation TSAV, as an American Indian initiative, was hampered as a result of this absence of data.

(b) *Appropriateness of TRIAD model.* Little progress was made on the goal directed at reduction of criminal victimization of Chickasaw Nation Senior Citizens. One of the primary reasons for this may have been the Tribe's choice of trying to put into place a TRIAD program. The TRIAD model requires considerable up-front planning and preparation to involve key stakeholders. This did not occur at Chickasaw Nation. Moreover, critical types of commitment needed from key stakeholders on TRIAD never came about at Chickasaw Nation. As noted, by the TRIAD manual, "the engine that drives TRIAD is the SALT (Seniors and Lawmen Together) Council . . . chiefs of police, seniors and sheriffs working together for the benefit of seniors . . . SALT Councils typically include representatives of the police departments, the sheriff's office, American Association for Retired Persons (AARP) and other senior organizations, Retired Senior Volunteer Program (RSVP), social service agencies, hospitals, the business community, clergy and other agencies involved in or interested in helping the elderly." The Chickasaw Nation itself doesn't have the leverage needed to bring many of those key stakeholders (outside the Tribe's immediate purview) together in the type of joint collaboration implicit in the TRIAD model. Thus, the TRIAD approach may have been unrealistic from the onset. TRIAD involves structural organizational change, and not just provision of services or activities for seniors. Nevertheless, based on interview data, it appears that TSAV partners regarded TRIAD as a potential 'program' at Chickasaw Nation, and never really saw the necessity of the types of collaboration discussed above.

(c) *Lack of high-level involvement of partner representatives.* The Chickasaw Nation TSAV initiative lacked sufficient involvement of high-level representatives from law enforcement agencies and courts with respect to the site's Planning and Core Team efforts. Rather, the involvement of law enforcement and courts was largely *activity* focused. While police officers did participate in various TSAV-sponsored activities, the Chickasaw Nation did not use its TSAV initiative as an opportunity to build new types of relationships with police departments — relationships which would benefit and permeate a wide array of future tribal undertakings on behalf of its citizenry. In this sense, TSAV was not used as a *process* for creating changes in relationships among community institutions. While collaborations were developed for purposes of conducting TSAV activities, there is no evidence — such as MOUs — of the TSAV grant having fostered more systemic changes among collaborating agencies.

(d) *Setbacks establishing Boys and Girls Club.* Problems were initially encountered in locating a proper facility for the Boys and Girls Club in Tishomingo. The facility originally proposed (which was part of the Tishomingo Community Center complex) met with opposition from some segments of the Chickasaw community. The tribal elders, in particular, were opposed to the site as a youth club since the facility had originally been targeted for use by senior programs. These community objections caused some setback in progress. Progress was also slowed by delays in obtaining non-profit 501(c)(3) status for the Club, and in completing the necessary building renovations for the Club site. Additionally, the Tishomingo community — e.g., businesses, organizations, individuals — were not as forthcoming as hoped with respect to providing financial support for the Boys and Girls Club. This necessitated the Club's Board to seek funding elsewhere in order to ensure continued operations. This situation was in marked contrast to many other Boys and Girls Clubs' experiences, in which substantial community support via donations is usually obtained.

(e) *Workplan design.* Unlike some of the other TSAV sites, much of Chickasaw Nation's Workplan dealt with planning, rather than with implementation. For example, the Workplan included conducting surveys, collecting statistics and verifying problems in order to make certain that a goal was appropriate. Objectives and activities which were not 'planning' in nature, tended to be the opposite extreme — namely, very concrete activities, like paint-outs, self-defense classes, rather than *strategies* aimed at making changes in community institutions (except for schools) or creating better cooperation between institutions/agencies. This type of Workplan design was one of several factors which the evaluators believe reinforced the local perception of TSAV being a DFA *program*, rather than a community-wide *process* for establishing formal, on-going partnerships among key stakeholders involved in crime and violence prevention.

(f) *Events external to TSAV.* When a woman was killed immediately following a TSAV-sponsored Senior Violence Prevention meeting, senior citizens began approaching TSAV staff even more frequently about safety issues and risks facing that segment of the community.

7.3 Placement of TSAV Program Within Tribal Government Structure

Throughout the duration of TSAV funding at the Chickasaw Nation, oversight of the initiative was lodged within the Department of Family Advocacy under the Tribe's Division of Education and Family Services. In the opinion of the evaluators, placing TSAV in that location of the tribal organizational structure had direct impact on the extent to which TSAV was ultimately (1) locally regarded as a program rather than a *process* and (2) minimally institutionalized by the Tribe at the conclusion of DOJ funding.

Initially TSAV staff were directly supervised by the Director of Family Advocacy. Early in 1999, supervisory responsibility shifted to the manager of the Violence Prevention Programs (a newly established office also under the Director of DFA). This program consolidated all DOJ-funded programs, i.e., TSAV, STOP Violence Against Indian Women, and Victims of Crime Act (VOCA) under one umbrella but ultimately under the oversight of the DFA Director.

Unlike the other TSAV sites that are part of this evaluation, at Chickasaw Nation there were no *formal* TSAV partnerships established across tribal and other agencies for the purpose of continuing problem-solving on crime, violence and substance abuse issues. Participation from the Drug Elimination Program was the one possible exception to this. Yet even in that case, despite the fact that the HUD-sponsored Drug Elimination Program was a substantive partner in the TSAV gang-related goal, no formal mechanisms were institutionalized to ensure that those collaborative efforts would continue beyond the TSAV funding period. TSAV program staff specifically noted, during the on-site interviews, that stronger partnerships would have benefitted certain of the TSAV goals; for example, the Senior Citizens goal would have benefitted from participation of Division of Health Systems staff, such as the local Community Health Workers.

The evaluators feel that this lack of formal institutionalization of TSAV partnerships is due, in large part, to TSAV's placement within the narrow programmatic setting of the Department of Family Advocacy. This placement of the initiative led key potential stakeholders to perceive TSAV as just another DFA project, rather than as a process for the purpose of establishing formal relationships

between the Chickasaw Nation and other agencies, such as the Ada City Police or the Ada City Public Schools.

Not surprisingly, therefore, the Chickasaw Nation TSAV initiative tended to be largely associated with the individuals hired by the grant and the specific activities they undertook — like the graffiti paint-outs, Neighborhood Watch, etc. — rather than as the initiator of community-wide collaborative undertakings. As noted by the TSAV Project Coordinator, “the critical players are not in place for TSAV or CAPS [Community Analysis and Planning Strategies] follow-up. There are no MOUs or MOAs in place.” Thus, neither institutionalization of a problem-solving process nor maintenance of partnerships across various community institutions was an outcome.

Viewing TSAV as a project, rather than as a means to foster systemic changes among the Nation and agencies (e.g., city or county) that can assist in stemming crime, violence and substance abuse, was in the evaluators’ opinion compounded by the unique circumstances of Oklahoma Tribes. Specifically, in the absence of reservations, Tribes in Oklahoma (except Osage) do not have clearly defined or substantial jurisdictional areas over which either tribal and/or BIA law enforcement or courts exercise authority. Moreover, most Oklahoma Tribes do not have their own civil/criminal/juvenile courts, and most do not have their own law enforcement forces.

7.4 TSAV As a Planning Model for Other American Indian Tribes

Chickasaw Nation administrative staff indicated that they felt BJA’s expectations were unrealistic with respect to being able to get a broad array of individuals and programs involved in TSAV planning and implementation. Not surprisingly, therefore, as was true at other TSAV sites, in most cases Chickasaw Nation’s TSAV Workgroups existed on paper only. As the Chickasaw Nation DFA Director noted, “We had to improvise as we went along with every goal and activity. Only people directly involved in activities showed up [at meetings].”

Based on interview data collected, an additional flaw in the TSAV design may have been the type of planning process in which sites were initially trained. Similar to statements made by other TSAV sites, the Chickasaw Nation TSAV Project Coordinator felt that BJA’s CAPS model (on which regional training workshops were held between October 1998 - March 1999) was far more effective and useful than the training TSAV sites initially received to develop their local Workplans. Had training of the CAPS type been provided at the onset of TSAV, the Director felt that local TSAV stakeholders would have benefitted far more and the evolution of TSAV at the local level would have ultimately been more consistent with BJA’s desired outcome.

7.5 Turnover in TSAV Staffing

As at the other three TSAV sites participating in the evaluation, the Chickasaw Nation experienced some TSAV staff turnover. The first TSAV Project Coordinator served from February 1997 to February 1998, at which time she resigned for reasons unrelated to TSAV. The position then remained vacant for three months. The other program staff member, namely the TSAV Field Specialist, was terminated in March 1998, shortly after the first Director's departure.

Both positions remained vacant until May. During that hiatus, obviously minimal TSAV activity occurred. Then, when the positions were refilled, job responsibilities associated with the positions were modified. Specifically, while the first TSAV Coordinator had focused her attention on the conflict-resolution education goal, and the Field Specialist had focused his attention on the gang awareness and prevention goal, job responsibilities became reversed. Since the new Coordinator's prior experience was as a law enforcement officer, he chose to focus his effort on the gang-related goal and the senior citizen-related goal. The Field Specialist position, on the other hand, was renamed, and became a Violence Education Specialist. The new staff member assuming this position, took responsibility for implementing the conflict resolution education goal.

These changes in personnel, and subsequent reversal in assignments for TSAV staff, not only disrupted continuity of project implementation, but also had lingering effects on project progress. With respect to the conflict resolution education goal, progress was less than anticipated each year as a result of TSAV staff not coordinating with school officials at the critical junctures in order to ensure appropriate scheduling of teacher training.

An additional, but unrelated, problem associated with staff turnover at Chickasaw Nation was that the first Coordinator took with her, at the time of her departure, all TSAV grant files, including the grant application, TSAV Workplan, all reports to BJA, a TSAV-purchased conflict resolution curriculum, and even the telephone. Needless to say, these circumstances created certain problems for the new TSAV staff with respect to subsequent implementation of the TSAV Workplan. The new staff operated without a copy of the Workplan for nine months and with few local records of previous TSAV activities.

7.6 Involvement of Law Enforcement and Courts in TSAV Partnership

With respect to law enforcement involvement in TSAV, the Chickasaw Nation TSAV program was quite successful. Relationships were developed between TSAV staff and both municipal and BIA law enforcement agencies, especially in relation to activities under the Gang Prevention and Intervention goal. For example, law enforcement personnel participated in increased patrols in the Country Place, Latta and Woodbrook public housing sites. Two officers in particular — one with the BIA Police and another with the Ada City Police (who also is the husband of the TSAV Violence Education Specialist) — were credited by Core Team members as having been very active in TSAV efforts related to gang prevention and intervention.

With respect to the court system, the Chickasaw Nation was markedly different than its counterparts at other TSAV sites. The Tribal Judiciary at the Chickasaw Nation does not serve in the same capacity as Tribal Courts do at other sites. Specifically, the Judiciary does not prosecute criminal, civil or juvenile cases. Rather, cases of that nature, involving American Indians or incidents committed on Chickasaw Nation property/lands, are prosecuted in the Bureau of Indian Affairs'

(Chickasaw Agency) Court of Federal Regulation, commonly known as the CFR Court. This difference in Tribal Judiciary versus Tribal Court function presented a different backdrop for the TSAV initiative at the Chickasaw Nation. Moreover, of particular noteworthiness is the fact that neither the Chickasaw Nation Tribal Judiciary nor the CFR Court was formally involved in the Chickasaw Nation TSAV partnership. While personnel of both entities may have periodically participated in certain TSAV activities, such as the graffiti paint-outs or Senior Citizens' Safety Run/Walk, their relationship under TSAV was informal at best. Not surprisingly, therefore, there has been no institutionalization of a partner relationship among court, law enforcement, and tribal entities as a direct result of a TSAV presence at the Chickasaw Nation.

7.7 Local Tribal Governance Factors

Unlike some of the other sites, the Chickasaw Nation TSAV was not affected by any instability brought about by changed political circumstances associated with tribal elections. Throughout the TSAV project period at Chickasaw Nation, the tribal administration remained stable. The current Tribal Governor has been in office for 19 years. In this respect, Chickasaw Nation was unique among the TSAV sites. Membership in the Tribal Legislature³ also remained relatively consistent, with the 1999 election resulting in turnover of just one seat in the 21-seat legislature body.

7.8 Jurisdictional Issues

Oklahoma Tribes (with one exception) do not have reservations or land held in trust, on behalf of the Tribe, by the federal government. At Chickasaw Nation, this lack of a land base over which they could exert, as a sovereign American Indian Tribe, jurisdictional powers in criminal and civil cases presented certain constraints with respect to Chickasaw Nation's ability to orchestrate the type of partnerships and cross-agency collaborations implicit in the TSAV design. In the absence of its own police force and in the absence of a Tribal Court that handles civil, criminal or juvenile court cases involving tribal members, the TSAV model may have had fundamental impediments from the onset for the Chickasaw Nation. Of necessity, it was primarily non-tribal agencies that had to be approached about participation. Although BIA police and other municipal agencies were involved as much as possible, the extent to which the Chickasaw Nation TSAV initiative could become a process for problem-solving across multiple tribal criminal justice-related entities was minimal. This factor alone may, in large part, explain the extent to which TSAV was regarded less as a *process* and more as a local program of DFA focused on specific violence prevention activities.

7.9 TSAV Lessons Learned Unique to this American Indian Tribe

One lesson learned was that the placement of a local TSAV initiative, within the tribal structure, may have significant effects on the extent to which TSAV is able to bring about systemic change and facilitate community-wide partnerships. Had the TSAV program at Chickasaw Nation been housed within the Chickasaw Nation's Planning and Statistics Department, as opposed to at a program level within DFA, TSAV staff might have been better able to transform the problem-solving processes employed by various branches of tribal government and key outside agencies. The Planning and Statistics Department is more likely to have a broader perspective in regard to the potential benefits of long-range problem-solving through cross-agency collaboration.

³ More commonly called Tribal Councils among other Tribes.

Another lesson learned from this site relates to the quality of the TSAV Workplan that was developed. Despite the fact that BJA sent a letter to the Chickasaw Nation noting that [its] “TSAV Workplan is an excellent model which will help guide others as they build their initiative,” the evaluation team felt that the Workplan’s lack of *strategies*, and instead its heavy focus on either planning or very specific activities, probably ultimately served as a detriment to the project. The very fact that the program staff was able to operate for nine months without any copy of the Workplan would indicate that the Workplan itself was neither seen as a working document, nor as a source of day-to-day management guidance. This situation might also simply imply that, despite BJA’s consistent emphasis on the importance of the Workplan, TSAV sites did not find the Workplan particularly significant or useful.

8.0 FUTURE DIRECTIONS AND DEGREE OF INSTITUTIONALIZATION

8.1 TSAV Partnerships Created and Sustained

For purposes of this evaluation, a distinction has been made between formal and informal partnerships.

With respect to formal partnerships, there is no evidence of any having been established at Chickasaw Nation. No Memoranda of Understanding or Memoranda of Agreement were developed, either across tribal agencies or with criminal justice-related entities beyond the purview of tribal jurisdiction. In fact, at Chickasaw Nation, TSAV stakeholders largely characterized their collaborative process as having been focused on joint participation in activities rather than on any type of long range joint planning.

Nevertheless, the evaluators did find that a number of informal partnerships were created and appear to be sustained now that TSAV funding has ended. The most effective partnerships of this nature were with local BIA and Ada City Police Departments, and with the Chickasaw Nation's Drug Elimination Program. Representatives from these entities not only participated on the Planning Committee but also in implementation of specific TSAV activities — e.g., armed security and police monitoring of targeted housing sites. Local law enforcement officers participated in certain Senior Citizen crime prevention activities and graffiti paint-outs. They blocked off roads for the TSAV-sponsored 5K Fun Run/Walk which took place in conjunction with the Tribe's Red Ribbon (Violence Prevention) Week. Police bicycle patrols and canine units participated in Crime Prevention Day activities. As a reciprocal gesture, TSAV staff and Core Team members have served as counselors and other staff at the Drug Elimination Program's youth camps.

Informal partnerships with other entities, such as local businesses, were also established. For example, the Chickasaw Nation's radio station donates door prizes for TSAV activities in addition to publicizing volunteer events such as the graffiti paint-outs. The Tribe's Trading Posts also donate door prizes. The Tribe's Senior Center and Wellness Center have donated fruit to participants in the Fun Run/Walk. Local theaters and restaurants have donated free passes for door prizes at TSAV-sponsored events. These types of collaborations have been fruitful and appear to be supported as worthwhile ventures for continuing in the future.

8.2 Institutionalization of TSAV as a Tribal Problem-Solving Process

Throughout implementation of TSAV, BJA staff stressed the importance of TSAV being viewed locally as a "process, not a project" that would be institutionalized, as a formal or informal partnership, across agencies by the conclusion of DOJ funding. As a comprehensive problem-solving *process* for addressing crime, violence and substance abuse, the Chickasaw Nation TSAV initiative has not met that BJA expectation. However, the Chickasaw Nation TSAV partners do feel that they have built a good foundation for collaboration by having initiated numerous joint activities with non-Indian groups/agencies with which they had not previously worked. It is hoped that these TSAV-sponsored collaborations will lead to more formal, on-going partnerships between the Chickasaw Nation and various criminal justice-related and community entities.

At the time of the evaluators' October 1999 site visit, neither the tribal government nor DFA had committed funds to institutionalize a TSAV-like function within the tribal structure. DFA

Administrators did state, however, that they hoped to use new federal funds, for which they had applied, to maintain the TSAV functions as well as the two TSAV staff members. Of particular interest to the DFA Director was maintaining support for the community policing efforts in the housing sites and expanding those efforts into tribal housing sites in Ardmore, Tishomingo and Purcell — each of which has serious crime problems. In a July 2000 telephone conversation with the Program Manager of DFA, the evaluators were informed that neither TSAV staff member was still employed by the Tribe and that no action had yet been taken by the Tribe to carry on the TSAV function.