

Key Considerations and Best Practices for Tribal Title IV-E Data Collection and Reporting

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Abstract

The Fostering Connections to Success and Increasing Adoption Act of 2008 [P.L. 110-351] authorizes tribes, tribal organizations and tribal consortia to apply for direct funding for Title IV-E foster care and adoption assistance funds. This paper describes the background of this act and provides guidance to tribes or tribal groups in applying. An electronic survey of twenty-

seven tribes and key informant interviews with eight tribal program administrators provides some insight for tribal child welfare administrators and practitioners in how to structure the application and implementation process in their own communities. Two of the administrators have received IV-E planning grants and anticipate direct funding within two years, and one of these has developed a viable data reporting system. According to these preliminary results, data collection and reporting requirements under the Fostering Connections Act present one of the significant challenges for tribal child welfare programs and tribal policy makers. This paper explores this complex issue and provides recommendations to other tribal groups. It is anticipated that, with careful planning and assistance, the Fostering Connections Act will provide an opportunity for tribes to administer culturally grounded services to their families and collect information that tribes themselves will find relevant and useful.

Introduction

The 2008 passage of the Fostering Connections to Success and Increasing Adoptions Act (P.L. 110-351) represents a unique opportunity for American Indian tribes to assert sovereignty through greater responsibility for child welfare service provision to their tribal members and families. The Act mandates that tribes will have the ability to design, implement, and receive funding for Title IV-E foster care and adoption programs. While the passage of the Act presents an opportunity for tribes and tribal child welfare programs, it also entails some challenges. Significant among these challenges is the required data collection and reporting to the Adoption and Foster Care Analysis and Reporting System (AFCARS).

Through discussions with tribal leaders and their Child Welfare Community of Practice members, the National Congress of American Indians (NCAI) Policy Research Center identified data collection and reporting related to Title IV-E implementation as one of the core policy

issues facing tribes. The purpose of this document is to serve as a resource for tribes currently grappling with data collection issues associated with direct Title IV-E service implementation, and for tribes exploring whether or not to pursue direct Title IV-E funding from the federal government. While this document may be useful to a variety of child welfare practitioners and policy makers, the intended audience is tribal child welfare agency administrators and tribal leaders engaged in child welfare decision making for their communities.

The following content was developed in collaboration with an advisory group composed of tribal child welfare agency directors, case managers, policy makers, and experts in Title IV-E and child welfare data collection (See Appendix A for a list of advisory group members). This committee, comprised of 23 members, met in July of 2009 for a two-day “Summit to Address Tribal Data Collection and Reporting Needs Under Title IV-E,” funded by Casey Family Programs.

The paper will begin with an overview of critical issues related to American Indian child welfare and data collection, followed by a discussion of Title IV-E data reporting requirements. Selected tribal agencies share their current experiences and lessons learned in collecting and reporting data, in which important issues in assessing an agency’s capacity to develop program, state, or federal compliant and effective data management processes are discussed. Finally, the paper concludes with recommendations and considerations for stakeholders.

Overview of Critical Issues

American Indian tribes have fought to maintain their inherent and legal right of self-governance since Europeans first came to the Americas. Historically, the attempts to undermine tribal sovereignty, destroy tribal cultures, and force the assimilation of American Indian people through their children were often masked in the language and practice of child welfare. Boarding

schools and forced adoptions of Indian children are only some of the most egregious examples (Unger, 1977; Crichlow, 2003). Throughout the long and complicated relationship of tribal governments to the U.S. federal government, the provision of culturally appropriate services and the collection of accurate data in tribal communities has been an ongoing issue. Because of this, the development of child welfare systems in which tribes provide their own services and collect and report their own data directly to the federal government is critical to the reassertion of tribal self-determination and the preservation of tribal cultures.

American Indian communities have centuries of experience as the subjects of social research, the vast majority of which has been carried out by non-Indian scholars. Native communities have rarely gained from these interactions; more often, researchers have derived the only benefit. Further, such study carried out by non-Indians within Indian communities has often resulted in policies that have been detrimental to Native self-determination and tribal sovereignty (Caldwell, et al., 2005). As Linda Smith (2001) suggests:

The power of research was not in the visits made by researchers to our communities, nor in the fieldwork and the rude questions they often asked... The greater danger... was in the creeping policies that intruded into every aspect of our lives, legitimated by research, informed more often by ideology....It told us things already known, suggested things that would not work, and made careers for people who already had jobs. (pp. 2-3)

There are countless examples of intrusive and inappropriate research projects by non-Indian academics attempting to “understand” Indian life ways. Tribes have largely been unable to get useful information on the needs and strengths of their members from such work. This has been especially true in child welfare. A 2000 study by the National Indian Child Welfare Association (Earle, 2000), found that, at most, 61% of data on tribal children in the National Child Abuse and

Neglect Data System (NCANDS) were being entered into the national database by state or county social services. Child protective cases in which the tribal program, Bureau of Indian Affairs (BIA), or a tribal consortia were the primary service provider were not included in this important and frequently quoted source of national statistics. As Fox (2004) points out, “Since information is collected by state/county rather than by tribal workers... the findings of neglect or abuse are based on the perceptions of non-Native workers who may be unfamiliar with the culture” (p. 79) Data generated when non-Indians unfamiliar with tribal cultures make practice observations are often less accurate, and therefore less useful, than data generated through observations made by culturally grounded American Indian practitioners. This lack of accurate data has negatively impacted the funding for tribal programs and has led to inadequate and inappropriate provision of services (Fox, 2003).

Unfortunately, because of the poor job non-Native researchers have historically done, Native people have sometimes been reluctant to collect data even when it could be beneficial in understanding and documenting needs and best practices of their communities. The Fostering Connections Act presents an opportunity for tribes, through direct control of both services and reporting, to assert an active role in addressing the centuries of destructive child welfare and research practices which have often resulted in American Indian children being separated from their families and cultures.

Title IV-E Data Collection and Reporting Requirements

Federal Data Systems

There are three federal databases that have been linked to child welfare service provision under the auspices of the Department of Health and Human Services’ Children’s Bureau. These are the Adoption and Foster Care Analysis Reporting System (AFCARS), the National Child

Abuse and Neglect Data System (NCANDS), and the Statewide Automated Child Welfare Information Systems (SACWIS). In addition, tribal access to the John H. Chafee Foster Care Independence Program requires use of the National Youth in Transition Database (NYTD). Each of these systems is presented separately.

Adoption and Foster Care Analysis Reporting System (AFCARS)

The Fostering Connections Act identifies AFCARS, as one of the eight requirements American Indian tribes must adhere to in order to operate a Title IV-E program. Through a 1986 amendment to the Social Security Act, and in response to a call for better case-level child welfare data, AFCARS became a mandatory data collection procedure for any state programs operating Title IV-E adoption and foster care services (Brittain & Hunt, 2004). These data are used to inform Congress regarding current child welfare trends and policy needs, to spur planning and program development efforts, and to provide the basis for other research and evaluation. Currently states are required to submit AFCARS data semi-annually. With the passage of Fostering Connections this requirement will extend to tribes who receive direct IV-E funding. A complete list of the adoption and foster care data elements required for AFCARS is found in Appendix B.

AFCARS represents an important step in improving data available on children in care, and through the federal Child and Family Services Review (CFSR) process, many past concerns about data quality and reliability (U.S. Government Accounting Office) have been addressed. While the CFSR process has improved state compliance related to data collection and reporting, the data that are collected through AFCARS currently do not provide a complete picture of the state of Indian child welfare. As tribes begin to develop and implement AFCARS procedures, clear understanding of federal requirements will help ensure that tribes have access to reliable,

valid information on American Indian children. These AFCARS systems must be developed and maintained in-house. As is the case for states currently, tribes will not be eligible to receive federal reimbursement for the operation and maintenance of “proprietary applications software” (45 CFR Subtitle A 95.617, 2002). Programs still will be eligible to receive 50% match funding for approved non-proprietary software.

National child abuse and neglect data system (NCANDS)

AFCARS is not the only data reporting system relevant to tribes pursuing funding through Title IV-E. The National Child Abuse and Neglect Data System (NCANDS) is a voluntary data reporting system that is currently being utilized by all 50 states. NCANDS captures information on the reporting, status and investigation of child abuse and neglect cases. Use of this data system is required for states receiving a State Child Abuse Grant. As stated above, tribes do not directly provide data to NCANDS. As a result, NCANDS data only represents those American Indian children involved in the State child welfare system¹. This represents approximately 61% of tribal abuse cases (Earle, 2000; Fox, 2003) Data elements for the NCANDS system include descriptions of the reported incidence of abuse and neglect, child and perpetrator demographics, and details on the types of services being provided including prevention services. Like AFCARS, the NCANDS system provides valuable information for policy makers and represents a leap forward in child welfare data management, but there are still issues with the underrepresentation of American Indian children, as well as with the accuracy of data that do exist. As with AFCARS, the NCANDS system data is reported to the Children’s Bureau through state reporting systems. A list of NCANDS data elements is found in Appendix C.

¹ Differences exist in the reporting of American Indian children between those States that operate under Public Law 280 and those that do not.

Statewide automated child welfare information systems (SACWIS)

While AFCARS and NCANDS are a set of data elements, SACWIS is a data collection system. More accurately, SACWIS encompasses a number of state-specific data collection systems. For example in Minnesota, the SACWIS system is known as Social Services Information System (SSIS) and is utilized by public human services to capture AFCARS, NCANDS and other case-level data relevant to child welfare. All but ten states² are currently either operating or developing a SACWIS data system. According to the 2003 U.S. Government Accounting Office report, most state officials have felt that the creation of these systems has been beneficial, yet the development, implementation, and maintenance of these systems has often been more onerous than originally thought. Development of a SACWIS system is optional for tribes (as it is for states) but there are some incentives, in the form of higher federal reimbursement rates, for the development of a SACWIS system. For this reason, close attention to the successes and lessons learned from the states with SACWIS systems will be important.

Cost is one of the most prominent considerations when examining the barriers to successful SACWIS implementation. As of 2003, the cost of state SACWIS implementation had totaled \$2.4 billion in funding (U.S. Government Accounting Office, 2003). The federal government offers a financial match at the 50% rate and technical assistance to states developing SACWIS systems. From 1993 through 1997, states were offered 75% rate for the development of a SACWIS system and 50% rate³ for the development of a non-SACWIS, stand alone AFCARS system. Likely the match required to draw down federal dollars will prove cost prohibitive for many tribes. The Children's Bureau is aware of this and in a September 2009 Program

²See the Children's Bureau website < <http://www.acf.hhs.gov/programs/cb/systems/sacwis/statestatus.htm> > for a list of states with SACWIS systems, those in the development process, and those states utilizing a different collection and reporting mechanism.

³ The 50% match rate is still available however it has to be cost allocated across benefiting programs.

Instruction document it states "...if a Tribe will serve a small client population under an approved Title IV-E program, it may not be cost effective to build a large, complex and fully-automated case management system" (Children's Bureau, 2009c, p. 6).

State SACWIS implementation has been in process since 1995 with successes and challenges throughout. State administrators and individuals involved in early SACWIS planning and implementation can potentially serve as a critical resource for tribes. NCAI could serve as a facilitator for tribal programs interested in connecting with state administrators.

National youth in transition database (NYTD)

The Fostering Connections Act also provides for tribal access to the John H. Chafee Foster Care Independence Program. Data for this program is collected through the National Youth in Transition Database (NYTD), a system specifically designed for managing data on independent living and transitional training for young adults. The Administration of Children and Families specifies 11 categories for these services: independent living needs assessment, academic support, post-secondary educational support, career preparation, employment programs or vocational training, budget and financial management, education on housing and home management, health education and risk prevention, family support and healthy marriage education, mentoring, and supervised independent living (Children's Bureau, 2009a). States are required to report NYTD data twice per year. Only tribal programs operating through a state agreement will be required to participate in NYTD.

Fostering Connections Data Requirements

AFCARS reporting is required

Because the Fostering Connections Act amends Title IV-E legislation to include "programs operated by Indian tribal organizations" (Fostering Connections to Success and

Increasing Adoptions Act of 2008, 2008) unless it is otherwise specified, tribes will be required to comply with all regulations currently in place for state IV-E programs. As is the case for states, AFCARS data will need to be reported semi-annually to the Children’s Bureau in electronic form. In April 2009, the Children’s Bureau stated “additional information will be forthcoming on how Indian Tribes can report AFCARS data” (Children’s Bureau, 2009b, Data and Information Sharing sec. para. 2). A September 17, 2009 program instruction document⁴ released by the Administration for Children and Families provides some follow up information, but more specific information will likely emerge as tribes begin the IV-E planning process.

Match funds for the development of a data system

Title IV-E specifies that IV-E agencies can draw down match dollars at a 50% rate for the development, implementation, and operation of an approved automated data management system. This requires that tribes come up with the funding needed to implement a system and then may be eligible for federal match dollars as long as they document and meet the federal requirements. The Children’s Bureau technical assistance document states “if a Title IV-E agency chooses to implement such a system, it is expected to be a comprehensive automated case management tool that meets the needs of all staff involved in foster care and adoption assistance case management” (Children’s Bureau, 2009, Data and Information Sharing sec. para. 3). Tribes have to be able to develop a system that meets the federal requirements for data management in order to draw down federal match dollars. These funds are a reimbursement, not a grant. The September 2009 program instruction document states that federal reimbursement “may be available for either Tribal automated child welfare information system (e.g., SACWIS) or a

⁴ The program instruction document is available at
<http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2009/pi0911.htm>

smaller case tracking application that does not meet the requirements of a State SACWIS system” (Children’s Bureau, 2009c, p. 1). For tribes, this may be a stand-alone AFCARS system.

Little is known about what types of systems will be approved and if funding will be available outside of the standard 50% reimbursement. Many tribes have significant technology infrastructure needs and the availability of tribal funds for developing this infrastructure is limited. The Children’s Bureau has indicated that it may be open to considering a simple spreadsheet data system using a common program like Microsoft Excel (personal communication, NCAI Data Summit, 2009). NCAI and other national tribal organizations such as the National Indian Child Welfare Association (NICWA) along with individual tribal members and leaders will need to advocate for funding, technical assistance to tribes, and accommodations for tribes developing a more comprehensive system that captures AFCARS, and perhaps SACWIS, data. Because the data needs of tribes vary considerably and the kinds of data tribes want to track are often unique from what states track, the data system prototype for tribes needs to reflect these distinct needs.

Current Experiences and Lessons Learned Relevant to Tribal Data Collection

NCAI Survey of Current Experiences

There are 562 federally recognized tribes in the United States (Department of the Interior, 2007). Each of these tribes has a unique political structure, economy, size, geography, culture, and history. Additionally, tribes exist on a vast continuum when it comes to the current state of their child welfare programming, and to their relationships with local, state and federal government entities. Some tribes are already providing IV-E services to their members through an agreement with a state⁵ and have a working electronic data management system. Other tribes have been effectively tracking data with paper and pencil because of the small number of child

⁵ As of 2001, 14 States and 74 Tribes have entered into Title IV-E agreements (Brown, et al. 2004, p. 9).

welfare cases. Some tribes serve thousands of members through IV-E each year, while other tribes will serve less than 50 cases. Tribes are not like states in either the numbers of cases they serve or their infrastructures. This diversity of tribes and tribal programs has to be understood and will undoubtedly impact implementation of IV-E services, including IV-E service data management.

In an attempt to capture a snapshot of current tribal data practices, NCAI sent an electronic survey to all of their Community of Practice members (approximately 250 members). The results, while limited by a small sample size (n=27), reinforce the notion that “one size fits all” is not a useful approach for tribal communities with respect to child welfare data management. Those who responded to the survey indicated that the tribal programs they represent: draw from several funding sources, utilize a variety of data collection systems, and report information to multiple federal, state, and tribal entities.

One of the most notable results of the survey is the degree of uncertainty about pursuing IV-E funding. When asked, “Is your tribe currently planning to apply for the new IV-E program funds for your child welfare program?” 35% of those answering the question indicated being uncertain whether they would apply. Even the 41% who specified that they were planning to apply for direct funding indicated a high degree of uncertainty about the timeline when asked, “If your tribe is planning to apply for direct access to IV-E funding, when are you planning to do so?” Only four of the 16 responses to this question indicated a clear timeline for applying. Much of this uncertainty is likely in reaction to the thorough planning and assessment process that many tribes will need to undertake in order to determine if they have the capacity to provide a full array of foster care and adoption services. Many tribes indicated that they were “still researching the process.”

The survey asked a number of questions designed to determine the current state of data collection and reporting for tribal programs. Of those who replied to the survey, none of the tribal programs indicated that they reported data through a federal reporting system or through a tribally designed system. Two tribes indicated using a state system to report child welfare data. While the inferential value of this information is limited by a small sample size, it does seem to parallel findings in a 2000 study by NICWA (Earle) that surveyed 57 tribal agencies and found that only 3.5% of those agencies reported data to a national system. In most cases, the national systems referenced were Bureau of Indian Affairs or Indian Health Services systems but in some cases tribes were sending AFCARS data to a state which was then including this data in reports to the federal government. The results of this survey suggest that, in general, tribes have limited experience reporting child welfare data to a national system.

NCAI Key Informant Interviews

In addition to survey data, key informant interviews were completed with nine individuals from eight tribal programs. An effort was made to collect information from tribal administrators most closely working with child welfare data issues or IV-E implementation. An additional effort was made to gather information from a diversity of tribal nations. To this end, those interviewed represented tribes ranging in size from approximately 1,800 members (Washoe) to approximately 180,000 members (Navajo). Interviewees came from a geographically and culturally diverse group of tribes at varying levels of IV-E readiness and interest. Two of the tribal programs interviewed received IV-E planning grants and anticipate direct funding within two years while an additional seven expressed interest in IV-E funding but are farther from this goal. This diversity of tribes contributed to a wide range of responses from interviewees in terms of child welfare services they provide. Interviewees also talked about the

strengths and challenges faced by their tribal child welfare programs. It should be noted that this group cannot be seen as representative of all tribal nations. Because many of those interviewed contacted NCAI to provide feedback on the paper, it is likely that those interviewed represent a group of tribes with a strong investment in direct IV-E. For a complete list of tribal interviewees see Appendix D.

Common challenges

Nearly all of those interviewed identified the need to capture child welfare data in the manner expected by ACF as a significant challenge for the organization and individual staff members. The following represent some of the most common challenges cited.

History of exploitation by researchers.

As was noted in the overview, the hesitation of tribal programs to report data on their people to the federal government is based on a long history of exploitation at the hands of non-Indian researchers. Specific steps can be taken to ensure that the data collection and reporting processes required by Title IV-E are beneficial to tribal communities, and improve services rather than continuing the legacy of exploitive and inaccurate social science study in Indian Country. Tribal leaders, tribal child welfare administrators, and national Indian organizations will need to assure that their voices are heard in the data system development and implementation processes. They will also need to feel like their communities' child welfare standards and their efforts to preserve their cultures are respected, and that the data collected is relevant and useful to their needs. Finally, they need to be confident that the information collected is used responsibly to inform program staff and policy makers at tribal and federal levels about Indian child welfare trends. To date, there has been limited ability for tribal voices to be heard in the Fostering Connections Act implementation process, but several organizations

have been working to insure that the tribal perspective is considered including NCAI, NICWA, and Casey Family Programs among others.

Cost.

For many tribes the potential cost of creating a data management system is daunting. While all of those interviewed felt strongly that improved data collection could have a positive impact on service provision, there was a feeling among interviewees that the lack of existing infrastructure could create a situation in which programs needed to devote staff time and match resources into the development of a data system to the detriment of existing services. Several of the tribes interviewed discussed the existing lack of infrastructure. For example, several agencies operated in remote areas without power lines and internet service. These are challenges that tribes cannot easily address without collaboration and accommodation from state and federal governments.

Lack of Understanding of Federal Requirements.

In the interviews, much of the anxiety by respondents about data systems can be attributed to the lack of understanding around federal regulations. Many of those interviewed did not feel that the federal requirements about data collection and reporting have been clearly outlined. One interviewee noted that her program did not have the resources for a comprehensive data system but that she was having difficulty understanding what the minimum requirements were for data reporting. This lack of clarity from ACF has made it difficult for tribes to make informed decisions. Those tribes who received IV-E development grants expressed anxiety about the language in the grant that stipulated tribes have to give back the \$300,000 provided by the grant, if an approvable plan was not in place in 24 months. In these cases, tribes have taken a

leap of faith that they will be able to meet all data management requirements.

Relationships with surrounding counties and state programs.

Interviewees noted strained relationships between their tribal agency and county or state programs was both an incentive to pursue direct funding and a complicating factor. While many interviewees cited positive working relationships with some of the surrounding states, nearly everyone interviewed had struggles with at least one of the surrounding states or counties. This is complicated by the fact that many tribes have relationships with multiple counties and/or states because of where they are located. As a result, receiving reimbursements, tracking members, and providing seamless services in concert with state systems were major challenges that impacted families and occupied time and resources of staff members and programs.

“One size fits all” approach.

To this point, the process of making direct Title IV-E funding available to tribes has been modeled on one utilized with the individual states. While IV-E implementation – and specifically the development of an AFCARS system – on the part of the states provide some helpful lessons for tribal programs, it is critical that policy makers understand tribes and states are very different entities. Prior to AFCARS requirements, every state was already providing child welfare intake and case management services. This will likely not be the case for the vast majority of tribes who will pursue direct IV-E funding.

Common planning strategies.

Despite the many challenges and potential barriers cited, many interviewees felt hopeful about the prospect of direct IV-E funding. Those interviewed, especially those representing programs that have already begun the process of pursuing IV-E funding, offered some useful planning strategies that could assist other tribal programs as they consider whether direct funding

is right for them. These strategies included the importance of starting small, creating or enhancing strong working relationships with states, and pairing internal staff and resources with outside assistance and consultants. Examples of these will be discussed in more detail.

Starting small.

Those interviewed were mindful that the development of IV-E services or a data collection system does not end when direct funding is achieved, but rather is a developmental process. While many programs may want a fully integrated, comprehensive data system for their tribe, resources and time may necessitate that programs first gain a clear understanding of what has to be accomplished in order to comply with federal regulations that includes reporting all AFCARS elements. This process takes time and has to be done in a thorough and deliberate manner. Finding ways to convert existing paper and pencil data collection into electronic form was a top priority for several interviewees. One interviewee noted, “[we are] not sure if we can afford the hardware to get a SACWIS-like system so [we] will probably start with a pared down system that meets minimum AFCARS requirements.” Many tribes interviewed were seeking foundation funding for the development of larger data management systems while working internally to meet basic data requirements. For some smaller tribes, it may never make sense to have a large data management system, but for many others, an integrated system could benefit multiple tribal programs.

Tribal/ State agreements.

While one of the clear benefits of Fostering Connections legislation is the recognition of tribal sovereignty and for tribes to interact with the federal government nation-to-nation, those interviewed also felt that growing and maintaining relationships with states was an important strategy in developing IV-E services. The creation of tribal/state agreements that allowed for IV-

E services to be provided by tribal programs with IV-E funding from states has been an important incremental step for some tribes in developing the capacity for direct IV-E funding and service provision⁶. Those tribes who have tribal state agreements have already begun the process of developing data management systems and have more ability to meet AFCARS requirements. For tribes without tribal/state agreements, this may potentially serve as a developmental step toward seeking direct IV-E funding. Many tribes have gained at least a preliminary understanding of AFCARS requirements through relationships in which tribal data is submitted to states and then reported to the federal government. Because states are aware of the tribe's ability to seek IV-E funding directly, they may have a financial incentive, as well as a legal requirement, to act in "good faith" with tribes around the development of an agreement.

Use of Resources.

Another strategy utilized by those being interviewed was to pair existing internal resources such as staff members with knowledge of IT and/or data systems in other tribal agencies with outside resources such as technical assistance consultants. For example, one of the tribes is considering utilizing their TANF data management system as a starting place for a IV-E data management system. This allows them to build upon a system that workers are already familiar with and that is working well for them. Another interviewee was hoping to rely on tribal IT staff from other departments for technical assistance. This would allow them to use staff that the tribe has already invested in. This would also allow the different programs to intersect more seamlessly and create an intersecting data management system that could be used by multiple

⁶ 72% of respondents to the NCAI survey indicated that they did not currently have a IV-E agreement with a state. Those tribes with an existing IV-E agreement (11% of those surveyed) will likely be more prepared to make the leap to direct funding because they will already be providing and billing for many of the adoption and foster care services. The Fostering Connections Act includes a provision requiring states to negotiate in "good faith" to create such an agreement.

programs. By utilizing internal resources, those interviewed felt they could save money, have an integrated system, and build stronger collaborations between programs.

Recommendations for other tribes.

Everyone we spoke with was more than willing to share his or her tribe's story. One of the interviewees described his organization as a "pathfinder" in the IV-E process. This idea of tribes taking the opportunity to pursue direct funding knowing full well that there will be both successes and challenges along the way that could be shared with others was echoed by those interviewed. Many noted that there should be a structure for tribes to share with each other during the early phases of IV-E development. This would help everyone as they go about trying to build strong tribal child welfare infrastructures. Interviewees also noted that federal officials working with tribes needed to hear clearly when regulations or expectations of tribal IV-E programs were not appropriate in the eyes of tribal programs. Many interviewees expressed concern that this legislation, while creating opportunities, may be similar to programs in the past where poor communication, lack of clear expectations, poor cultural understanding, lack of resources and trained personnel, have resulted in poor outcomes for tribal children and families. Advocating for an official committee of tribal leaders and administrators that advises the Administration for Children and Families on Fostering Connections implementation was a suggestion by multiple interviewees. It was also suggested that there be a vehicle for those tribal programs that received IV-E development grants to communicate with other tribes during the planning and implementation phases.

Success Story

One tribal interviewee in particular noted success with the data management process. Francine Jones, Director of Tribal Family and Youth Services for the Central Council Tlingit and

Haida Indian Tribes of Alaska (CCTHITA), shared her agency's successful implementation of a comprehensive, integrated, multi-program data management system. This system was rolled out June 1, 2009 and Jones notes that it is by no means perfect but the process and the system itself may offer one successful model for other tribes interested in creating a large-scale integrated data management system. The following information comes from an interview and follow up emails with Francine Jones.

The data system that was created for CCTHITA centers on tribal enrollment and utilizes a supervisory tree model to ensure that supervisors have access to the case notes and data relevant to all of the case workers they supervise. Case information is integrated across programs and is available in real time. The data system is built around a business mapping process that identifies key decision-making points in the case management process. A centralized intake for all client services programs uses one face sheet to insure that families are not receiving duplicate requests for the same information.

Perhaps more important than the system itself was the development process that CCTHITA went through. It is difficult to place a clear start date to the work of creating a data management system because, as Jones notes, discussions had been taking place at a variety of levels and programs for years prior to officially undertaking the process. Previous data systems created largely by outside IT consultants had offered some means of collecting information for a number of the tribal programs, but the results had been a system that did not meet the needs of their programs. The work of creating an integrated data system that served child care, TANF, social services, child welfare, vocational rehab, child support, and enrollment was energized in 2005 after CCTHITA received a three year grant from the Administration for Native Americans to create an integrated enrollment and case management system.

The current system was developed by addressing gaps and needs in the current systems instead of developing a new system entirely from scratch. Jones notes that the business process mapping that the programs undertook which was facilitated by an IT/human services delivery consulting organization, was perhaps the most helpful stage in the development of the software. This process forced program administrators from across the spectrum of tribal programs to clearly understand and articulate their case management and business processes from intake through case closure. Through this process, a supervisory tree was designed as a core feature of the management system. As Jones noted “techy people don’t talk process” and this process facilitated better communication between IT consultants and program administrators.

Internally, CCTHITA created a “Database Core Team” consisting of one representative from each department in client services. These individuals were given half time release to work specifically on the data system for nearly two years. An implementation team that included managers from Client Service programs served by the data system was created and met regularly to create an efficient Client Service Process. Prior to rollout of the new data management system, a Business System Analyst position was created to serve as an intermediary between program staff and IT staff. Finally, a team of high frequency users from each department was developed to provide a case management perspective to the database technical staff. This team created mock case scenarios that were used to test the functionality of the system. All of these teams remain in existence and continue meeting to discuss implementation and maintenance issues. One of the strengths of the system is that it can likely be adapted to contain all AFCARS fields in anticipation of IV-E direct access.

Lessons Learned

Without a doubt, not all tribes will have the resources, support, or even need to undergo a development process that matches that of CCTHITA. For many tribal programs, simply adapting a paper and pencil data collection system to capture AFCARS elements electronically will meet the needs of case managers. For others willing and able to pursue a comprehensive data system, the work of CCTHITA provides the following helpful lessons:

The importance of planning

As Jones notes “you need to do work before you bring someone in.” With many tribes lacking expertise around data systems, the inclination will be to rely heavily on outside assistance. While this may be a useful strategy, the work of CCTHITA serves as a reminder that developing an understanding of case management processes, building support amongst case workers, administrators, and tribal leaders, and identifying individuals that are able to speak the language of both IT and social work are key development strategies that can take place before outside IT developers are sought out. Caution must be taken to make sure that whoever is brought in from the outside is going to develop a system that meets the needs of your tribal system. They should be able to assist you in adapting a system to meet your current needs and making sure that it is easily modified by your staff as needs change in the future.

Dedicate staff time to database development

Not all tribes will be fortunate enough to receive federal funding for the development of a data system, but the experience of CCTHITA serves as a reminder that prioritizing the creation of a data system can yield positive results. Jones states that the hiring of a Business System Analyst was “one of the best things we ever did.” CCTHITA identified key users and decision makers and provided them with a structure for having input into the creation of the data system.

This process served them well in the development and will mean that their staff will be more prepared to fully implement the system. Tribes have huge demands on their time but dedicating staff to data management upfront will pay off in the long run by having a functional system that takes less time for all staff and meets program needs.

Training is critical

Jones said that training has been a critical aspect of implementation. This training has focused on several elements of the data management process. Prior to the rolling out of the new data system, each employee was provided a policy and practice manual for the database that will serve as a guide for troubleshooting as well as a means of standardizing the data input. All client service employees received training in case management, clinical documentation, case noting, service plans, and the database system. In addition, all client services supervisors received formal training on the utilization of the supervisory tree. Since the launch of the system, several trainings have addressed the lack of comfort that many workers have with both the process of data collection and creation of reports. CCTHITA chose to “freeze” the data system for the first year so that changes were not constantly being made. Jones notes that this decision has been both beneficial and frustrating. It ensures that the development of the data system is not a moving target with constantly changing processes, but it has also meant that challenges discovered after rolling the system out will not be addressed until a year later. Perhaps the most critical lesson learned is that staff training should be ongoing and not just a onetime event. This recognizes that all staff members learn at a different pace, and that as the “bugs” get discovered in the system, training is needed to bring everyone up to speed. Approaching training as a developmental process rather than a onetime event helped to make the implementation process more successful.

Recommended Strategies

The following recommendations emerged from discussions that took place at the “Summit to Address Tribal Data Collection and Reporting Needs Under Title IV-E,” as well as through feedback collected via survey and personal interviews. These recommendations are based on information currently available. With this in mind, data collection and reporting issues for Title IV-E will be continually evolving, new regulations will emerge and lessons learned will be gathered from those communities pursuing direct funding and the creation of a data system.

As has already been noted, the diversity of tribal communities is so great that no single approach will fit all communities. For those tribal child welfare programs that are interested in pursuing Title IV-E funding and developing a data system that meets reporting requirements, the following general framework may be useful. Although the process delineated below tends to be sequential, the steps may be overlapping or sometimes need to be performed in a different order.

Assess Need and Readiness

- Become educated about IV-E data collection and reporting
- Assess tribe's current capacity and need

Build Support

- Build political and grassroots support
- Create a community of invested stakeholders
- Contact advisors at the national level with experience in data system development

Planning

- Strategize resource development
- Identify data system "point person"
- Develop a data system implementation plan

Apply for Direct IV-E and Create Data System

- Apply for direct Title IV-E funding through the Fostering Connections Act
- Work closely with IT partners to develop a system that meets organizational needs
- Test system and provide feedback as a committee
- Train workers
- Collect data and report

Ongoing Assessment and Modification

- Reassess data system and training needs frequently
- Develop strategy for technology maintenance
- Participate in a national conversation about the needs of tribal child welfare programs around data collection and reporting

Assess Need and Readiness

Become educated about IV-E direct funding data collection and reporting

The possibility of direct IV-E funding represents a dramatic shift in child welfare policy and, while many tribes have been advocating for direct funding for years, both child welfare administrators and tribal leaders will need to develop a thorough understanding of the Fostering Connections legislation and the requirements related to data collection and reporting. Resources will be emerging through the Administration of Children and Families, the National Indian Child Welfare Association, the National Congress of American Indians and other organizations. Perhaps the most helpful resource for many tribal programs will be other tribes. As tribes begin to pursue direct funding and begin to create compliant data systems, the lessons learned from these endeavors will be invaluable for other tribal communities beginning the process.

Assess Tribe's Current Capacity and Need

Tribes with a clear vision of the capacity of the child welfare program to meet the needs of the community will be better positioned to provide services and to effectively document that service provision. Direct IV-E funding is an exciting proposition for many tribal programs, but a thorough evaluation of the program's readiness to provide these services and collect the necessary data is critical before choosing to access these funds. Program evaluation and community needs assessments may be useful tools for this initial assessment. Program managers should take a close look at the experience and skill of the staff, the current services being provided, and the capacity of other departments and agencies involved in the child welfare process (tribal court, tribal health, education, foster homes, etc.).

The following ten questions may serve as a useful guide for those programs.

1) What services are currently being provided?

Program administrators should develop a comprehensive list of the services currently being provided by the tribal program. This list should include child welfare/foster care services as well as court services, health services, and any other programs that would be impacted by IV-E data collection.

2) What data collection systems or processes are currently in place?

Tribal programs may be already reporting data to foundations, the federal government through Title IV-B, state departments of human services, Bureau of Indian Affairs, and/or other sources. For some programs there is already an electronic data collection platform being utilized. Experiences with data collection and reporting as well as current infrastructure to enhance data collection should be assessed and documented.

3) What services will be provided with direct Title IV-E funding?

For many tribal programs, Title IV-E funding will allow the program to expand services within the sphere of foster care and adoption. Program administration and staff should brainstorm a list of new services, based on the needs of the community, and then determine the capacity of the tribe to collect data on these services. Prevention programs and culturally based treatments may also be expanded through IV-E funding and may require unique data collection processes.

4) How will services be provided?

Tribal programs should consider how services could best be provided. Will the program utilize a mainstream model of service delivery? Will the program utilize culturally based models? Will service provision draw on both paradigms? Data collection often drives the services being provided so for those programs interested in providing culturally based services it will be important to consider how these services will be assessed and the most effective method

to bill for them. Taking into account how other tribal programs have built around traditional cultural models of service delivery and how those programs have collected data may be helpful in making decisions about how to proceed.

5) What resources exist that could be used to develop a data system?

One of the most important aspects of deciding whether to move toward a tribal IV-E data system is how the tribe will pay for it. What are the available resources to help pay for development and operation of a data system? Will the child welfare program be able to rely on internal tribal funding? What is the potential and/or the desire for the tribe to form a consortium with other tribes to develop a common IV-E data system and reduce the individual costs for all participating tribes? Will in-kind sources of funding be able to be drawn upon for a portion of the resources? Are grant writers in place to assist the program in obtaining external funding either from state or federal grants or from foundations? Does the tribe have experience with using match funding? What is an estimate of how much IV-E federal reimbursement can be drawn down to support the data system? What technical assistance is needed? This will vary depending on the tribe's experience with data systems, the size of the program, and what services are offered. Where can technical assistance that meets the needs of the tribe be secured? What is a reasonable cost given the array of services you need? These are all critical questions to ask when assessing the existing resources. IV-E funding formulas can be confusing so working with someone reputable who has experience with the process will be helpful.

6) What level of support exists for Title IV-E implementation and data collection?

Successful IV-E implementation and data collection will require support from several sources. Are there champions for the child welfare program within the tribal council who are interested in learning about this opportunity? Are both child welfare administrators and program

staff supportive of the increased service provision and responsibility? Do families, elders, and community leaders – including those currently involved in the child welfare system – understand the change and support it? Is there a tribal court and, if so, do the court staff members understand federal law and tribal code related to foster care and adoption? These are only some of the key players that should understand and support IV-E implementation and IV-E data collection.

7) What level of collaboration exists between key tribal organizations?

Tribal organizations outside of the child welfare program will not only need to support a move towards direct IV-E funding, they will need to be equipped to effectively collaborate on cases and on data collection and reporting. Key partners include tribal courts, law enforcement, schools, accounting, information technology, and others. Again, lay the foundation for this collaboration prior to undertaking IV-E and make sure partners continue to understand and support the program through all phases of implementation.

8) What data do you have to capture?

Program staff will need to understand the required data elements within AFCARS as well as any other federal systems to which the program will report data. Depending on the type of services being provided, this may include NCANDS or NYTD data as well. Tribes may also want to consider a system that will collect and report required Bureau of Indian Affairs (BIA) data.

9) What data do you want to capture?

In addition to the required elements, programs will need to have discussion about the data elements that they would like to see collected that may not be required by outside funders. Are there culturally based services being provided that would need to be captured with other data elements? Are their definitions of key child welfare terms that will need to be changed to fit the

values of the tribe? Would the program like to capture ICWA compliance through the data system? Is there administrative or management data that would be useful to help the program advocate for tribal resources to support child welfare services? Are there service delivery issues that additional data could help you evaluate? These and other questions need to be considered.

10) Who will oversee the development of the data system?

Will a data system need to be developed from scratch or can an existing system be built upon? Will a committee be created to oversee the development and implementation of a data system? Who are the important stakeholders on this committee? Will the child welfare director oversee this process? Do you want to designate paid staff time to work specifically on this project? Will a vendor be relied upon to inform the development? Is there another tribe with relevant experience who could be consulted to provide ideas? NCAI, NICWA and other organizations may also be of assistance in providing tribally based information through written materials, training, and other kinds of technical assistance.

Build Support

Build Political and Grass Roots Support

Fostering Connections presents tribal communities with a tremendous opportunity and it will be critical for child welfare administrators to educate and build support at the tribal council and community levels. Elders can play an important role in speaking to the importance of cultural practices in child welfare. Many programs will need financial and political support from their council members. These tribal leaders can also provide advocacy and political strength in interactions with the federal government. When discussing the Fostering Connections Act with these tribal leaders, it is important to ensure that they understand the issues around data collection and reporting.

Create a committee of invested stakeholders

Once support has been built amongst active community members, elders, tribal leaders, directors of key agencies, and within the child welfare workforce including middle management, it is critical that a formal committee is established to represent these stakeholders. An identified IT person should be involved from the beginning. The committee should have decision-making authority regarding data system development. If possible, designate a staff member who will have significant work time assigned to manage this process.

Contact advisors at the national level with experience in data system development

Organizations such as the National Indian Child Welfare Association (NICWA), the National Resource Center for Child Welfare Data and Technology, the newly created National Resource Center for Tribes, other resource centers within the National Child Welfare Training and Technical Assistance Network, and other national level organizations will be critical partners in the development of a tribal child welfare data system. The Administration for Children and Families has regional offices that can serve as important contacts as well. For a map of the states in each region, as well as regional office contact information, see:

http://www.acf.hhs.gov/programs/oro/regions/acf_regions.html

Planning

Strategize Resource Development

Data systems can be very expensive and, while agencies developing approved systems will be able to draw down a match to help offset the cost, resources in the form of in-kind and cash will be necessary for the development and maintenance of the software and technology infrastructure, for staff training, and for other related expenses. A sustainable plan for funding the data system should be developed at this stage.

Identify data system “point person”

A staff person should be assigned to be the central contact between the committee of stakeholders and any IT organizations. This person can also serve as a point of contact for child welfare staff members with questions about data issues and can provide initial and ongoing training related to the data system.

Develop a data system implementation plan

The committee of stakeholders with help from national advisors should utilize this stage to develop an implementation plan for a data collection and reporting system that includes a plan for identifying and utilizing technical assistance. Elements of these plans can be used in the application for direct Title IV-E funding.

The committee of stakeholders, with assistance from the national level advisors, should begin looking at specific data elements at this stage. Those elements required by AFCARS are listed in Appendix B. For those programs that are interested in creating a data system that is integrated with other departments, and for those programs that are looking to capture child welfare data outside of the required elements, such as culturally specific data, this stage represents an important opportunity to develop a system that meets the needs of the tribe as a whole. Keep in mind that you may want to take an incremental approach and add to system capacity overtime.

Apply for Direct IV-E and Create Data System

Apply for direct Title IV-E funding through the Fostering Connections Act

Direct IV-E funding should be sought once core assessments have been done, political support is in place, and a strong committee of stakeholders is engaged in developing the data

collection and reporting process. Elements of the data system implementation plan can be utilized in the direct IV-E funding application.

Work closely with IT partners to develop a system that meets organizational needs

A data system vendor should be contacted only after significant planning and development work has been done. Model Indian child welfare data systems are in existence and the organizations that developed them may be useful first contacts when trying to find an IT organization that will best serve the needs of the tribe. The experiences tribal child welfare agencies have had with technology consultants, specifically data systems vendors, have been varied and offer some important lessons for agencies seeking outside guidance when creating a data management system. It is strongly advised that tribal child welfare administrators begin the process of creating a data system not by contracting with a vendor, but by establishing a clear vision for service provision and data collection practices *before* consulting with these for-profit entities. Several tribes with experiences contracting with for-profit vendors found that their lack of preparation beforehand resulted in a system that did not fully meet their needs in spite of the significant cost and expertise of the vendors (personal communication, NCAI Data Summit, 2009). Some of these programs actually had to start all over again because the system they purchased was either inadequate or was too difficult for staff to use.

Once you have done an initial evaluation of your needs and you do want to consult with data system vendors, the following are key considerations.

Do selected vendors have experience in child welfare?

It is important that vendors understand the intricacies of child welfare case management, and associated data reporting. References should be made available and should reflect this experience. Vendors should understand foundational concepts related to Indian child welfare,

especially tribal sovereignty, and should be willing and able to craft data systems compatible with culturally grounded services. If some, but not all, individuals working with the vendor have child welfare experience and experience with tribes, it is appropriate to insist that those staff members be involved in the project.

Does the vendor understand tribal and regional differences?

While elements of state systems have been duplicated by other states, each individual state system is unique. This will certainly need to be the case for tribal programs as well. Vendors will need to understand legal, cultural, economic, and other differences among tribal programs. Even amongst the small group of interviewees for this project, the differences in infrastructure, size, legal realities, and culture were dramatic.

How much flexibility does the vendor's data management system have?

Many tribal programs will be pursuing a system that will collect required AFCARS information as well as data related to unique community standards and services. For these tribal programs, a "one size fits all" system will not be appropriate and the degree to which a vendor can craft an adequately flexible system needs to be considered. The presentation of a prototype will be important to see in order to make a final decision. Vendors should be willing to demonstrate a live, currently functioning system that is similar in focus to the proposed tribal child welfare system and should be able to clearly demonstrate how this system could be changed to meet the tribe's changing needs, and to estimate the system's cost.

How will the work with the vendor be impacted by the restrictions on federal reimbursement for proprietary systems?

As was noted above, the ACF prohibits the use of federal reimbursement for proprietary software and single source "commercial off the shelf" (COTS) products. This does not mean that

these products cannot be utilized, but understanding how systems created by vendors are impacted by these regulations will be critical.

Will the vendor make a commitment to provide ongoing training and follow up?

One of tribes interviewed for this paper noted that their agency worked with a for-profit vendor who created a data system but did not provide any follow up or training to the organization. This situation is likely not unique to this one individual tribal program. Obtaining a formal commitment regarding follow up services and training is advised.

Test system

Once a model system has been developed, it will be important to test the system to determine if it truly meets the needs of the program. Child welfare staff and other committee members should participate in this process because they will be the staff members who utilize the system on a daily basis. This is an opportunity to see how “user-friendly” the system is to those who will use it most often. The prototype should be specific to your program and not a generic model.

Once the testing phase is complete and the committee has approved the model or prototype, the data system can be further developed for implementation and then made operational. Changes and upgrades will undoubtedly need to be made once the system is in service and staff can provide feedback for improvement based on real life usage.

Train workers

One of the most critical steps is effective training of workers. This training should cover the data collection and data entry procedures as well as core content on the need for accurate information and services that are informed by good data. Training should not be seen as a one-

time event. Proper supervision and encouragement related to data collection will be critical and should be incorporated into the ongoing program development efforts.

Collect Data and Report

After workers have been properly trained, it will be possible to begin collecting case-level data. This process will undoubtedly include frustrations for workers and administrators but represents an important step in the growth process of the data system. AFCARS data will need to be reported semi-annually.

Ongoing Assessment and Modifications

Reassess data system and training needs frequently

Staff, partner organizations, and community members should be able to provide feedback related to data collection processes. These stakeholders' feedback should be used to inform changes to the system as well as future training. It may be important to limit how often the system is modified to once or twice per year to avoid constant changes to the system that staff need to relearn.

Develop strategy for technology maintenance

Data system development is only one piece of the data collection and reporting process. It is important that tribal child welfare programs with sophisticated data systems have competent IT staff available to provide maintenance, upgrades, and troubleshooting.

Participate in a national conversation about the needs of tribal child welfare programs around data collection and reporting

In order for the implementation of Fostering Connections legislation to be a success, tribal leaders and administrators will need to assert a strong voice in the process. This advocacy will require active participation by tribal communities and active listening by the federal government. It will be essential that the tribal voice is heard specifically around data collection

and reporting issues. The National Congress of American Indians is one potential vehicle for ensuring that those in charge of creating standards for data reporting have a clear understanding of the needs and desires of tribal nations.

Conclusion

As has been discussed previously in this paper, and as is evident to many people in Indian Country, Native children and families are better served and achieve better outcomes when tribal agencies, rather than state or county ones, provide the child welfare services they need. When tribes utilize their specific cultural strengths and resources in child welfare service delivery to members, they can ensure that assistance coming to families in need is provided in a culturally relevant and meaningful manner. Tribal agencies engaging in this manner of child welfare practice are far more likely to successfully engage families in a collaborative process for addressing identified needs than are their public counterparts.

When tribal agency administrators have access to accurate and culturally-valid data on the people who receive their services, it will be easier for these administrators to determine the efficacy of their programs, and point them to areas for potential improvement. Thus, data reporting systems, if crafted according to the tribe's specifications, can serve not only as a means to securing Title IV-E reimbursement, but also as a feedback mechanism for tribal agencies to hone their ability to meet the needs of their people.

The Fostering Connections Act creates an opportunity for tribes, in keeping with their nation-to-nation political relationship with the federal government, to access Title IV-E funds directly from the federal government. This opportunity to exercise sovereignty does not come without significant challenges, not the least of which is the requirement that tribes develop data collection and reporting systems capable of reporting AFCARS data at a minimum. The

development of technology infrastructure and data systems is a significant undertaking, and tribes should be well aware of the costs and effort necessary to carry out this development.

Development of required data collection and reporting abilities, and the technology infrastructure to support them, will, for many tribes, require extensive internal planning. In addition to internal planning, tribes should communicate with one another and with national American Indian organizations about the challenges faced in developing their data capabilities. Tribes will be able to influence policy development in this area more effectively if they network and present a united front to advocate for their needs and voice their concerns with the federal government. In doing so, they will pave the way for higher degrees of success for other tribes in establishing their own IV-E programs with direct federal funding and creating data collection systems that meet agency and community needs.

References

- Brittain, C. R., & Hunt, D. E. (Eds.) (2004). *Helping in child protective services: A competency-based casework handbook* (2nd ed.). Oxford: Oxford University Press.
- Brown, E. F., Limb, G. E., Clifford, C. A., Munoz, R. & Whitaker, L. S. (2004) Using Tribal/State Title IV-E agreements to help American Indian tribes access foster care and adoption funding. *Child Welfare*, 83(4) 293-316.
- Caldwell, J.Y., Davis, J.D., Du Bois, B., Echo-Hawk, H., Shepard Erickson, J., Goins, R.T., Hill, C., Hillabrant, W., Johnson, S.R., Kendall, E., Keemer, K., Manson, S.M., Marshall, C.A., Running Wolf, P., Santiago, R.L., Schacht, R. & Stone, J.B. (2005). Culturally competent research with American Indians and Alaska Natives: Findings and recommendations of the first symposium of the work group on American Indian research and program evaluation methodology. *American Indian and Alaska Native Mental Health Research: Journal of the National Center*, 12(1), 1-21.
- Children's Bureau. (2000a). *Technical Bulletin #6*. Retrieved August 1, 2009, from <http://www.acf.hhs.gov/programs/cb/systems/afcars/techbulletin/tb6.pdf>
- Children's Bureau. (2000b). *Technical Bulletin #7*. Retrieved August 1, 2009, from <http://www.acf.hhs.gov/programs/cb/systems/afcars/techbulletin/tb6.pdf>
- Children's Bureau. (2009a). *About NYTD*. Retrieved August 30, 2009 from http://www.acf.hhs.gov/programs/cb/systems/nytd/about_nytd.htm
- Children's Bureau. (2009b). *Considerations for Indian Tribes, Indian Tribal Organizations or Tribal Consortia Seeking to Operate a Tribal Title IV-E Program*. Technical Assistance Document. Retrieved August 1, 2009 from http://www.acf.hhs.gov/programs/cb/laws_policies/tribal_considerations.htm#part4
- Children's Bureau. (2009c). *Program Instruction*. Retrieved November 1, 2009, from http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2009/pi0911.htm
- Crichlow, W. (2003). Western colonization as disease: Native adoption and cultural genocide. *Canadian Social Work*, 5(1), 88-107.
- Department of the Interior (2007). Indian entities recognized and eligible to receive services. Retrieved from the United States Bureau of Indian Affairs <http://www.loc.gov/catdir/cpso/biaind.pdf>
- Earle, K.A. (2000). *Child abuse and neglect: An examination of Indian child welfare data*. Retrieved June 20, 2006 from the National Indian Child Welfare Association website http://www.nicwa.org/resources/catalog/research/2000/02.Child_Abuse.pdf.

- Fostering Connections to Success and Increasing Adoptions Act of 2008, Pub. L. No. 110-351 (2008).
- Fox, K. E. (2004). Are they really neglected? A look at worker perceptions of neglect through the eyes of a national data system. *First Peoples Child & Family Review*, 1(1), 73-82. Retrieved August 1, 2009, from http://www.fncfcs.com/pubs/vol1num1/Fox_pp73-82.pdf
- Fox, K. A. (2003). Collecting data on the abuse and neglect of American Indian children. *Child Welfare*, 82(6), 707-726.
- Geen, R. (2009). The Fostering Connections to Success and Increasing Adoptions Act: Implementation issues and a look ahead at additional child welfare reforms. Child Trends Working Paper. Retrieved on August 10, 2009, from http://www.childtrends.org/Files//Child_Trends-2009_02_10_FR_NewCWPaper.pdf
- Goldberg, C. (n.d.). Questions and answers about Public Law 280. Retrieved August 24, 2009 from Tribal Court Clearinghouse website at <http://www.tribal-institute.org/articles/goldberg.htm>
- National Indian Child Welfare Association (2008). Recommendations for improving child abuse and neglect data and services for American Indian and Alaska Native children Retrieved at <http://www.icctc.org/NICWA%20report1.pdf>
- Unger, S. (1977). *The destruction of American Indian families*. New York: Association of American Indian Affairs.
- United States Government Accounting Office. (2003). *Most states are developing statewide information systems, but the reliability of child welfare data could be improved* (Report number 03-809). Retrieved August 1, 2009, from the GAO website <http://www.gao.gov/new.items/d03809.pdf>
- United States Government Accounting Office. (2005). *Indian Child Welfare Act: Existing information on implementation issues could be used to target guidance and assistance to states* (Report number 05-290). Retrieved July 12, 2006 from the GAO website <http://www.gao.gov/new.items/d05290.pdf>.
- United States Government Accounting Office. (2002). *Tribal TANF allows flexibility to tailor programs but conditions on reservations make it difficult to move recipients into jobs* (Report number 02-768). Retrieved August 10, 2009, from the GAO website <http://www.gao.gov/new.items/d02768.pdf>

Resources

Children's Bureau information on federal reporting systems:

<http://www.acf.hhs.gov/programs/cb/systems/index.htm>

National Resource Center for Child Welfare Data and Technology:

<http://www.nrccwdt.org/>

National Congress of American Indians Child Welfare Community of Practice:

<http://childwelfare.ncaiprc.org/>

National Indian Child Welfare Association Government Affairs and Advocacy:

<http://nicwa.org>

Child Welfare Information Gateway: Information Systems and Data

http://www.childwelfare.gov/systemwide/info_systems/

The Fostering Connections Resource Center

<http://www.fosteringconnections.org/>

The National Resource Center for Tribes

<http://www.nrc4tribes.org/>

Appendix A

Advisory Group Members

Participant	Organizational Affiliation
Mary Ann Akers	Indian Child and Family Resource Center
Louise Brady	Sitka Tribe Social Services
Julie Chang	Child Welfare League of America
Thomas Cody	Navajo Nation Division of Social Services
Priscilla Day	University of Minnesota Duluth
Lucille Echohawk	Casey Family Programs
John Fluke	Child Protection Research Center, American Humane Association
Kathleen Fox	National Indian Child Welfare Association
Sarah Hicks	National Congress of American Indians Policy Research Center
Mary Iannone	Face2Face Software
Francine Jones	Tribal Family & Youth Services Department, Central Council of Tlingit & Haida Indian Tribes of Alaska
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Susan Smith	Casey Family Programs
Dave Thorsen	Child and Family Services, State of Montana

Appendix B

AFCARS Data Elements

Adoption Data Elements	Foster Care Data Elements
State	State
Report Period Ending Date	Report Period Ending Date
Record Number	Local Agency (FIPS Code)
State Agency Involvement	Record Number
Child's Date of Birth	Date of Most Recent Periodic Review
Sex	Date of Birth
Child's Race (American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or other Pacific Islander, White, Unable to Determine)	Sex
Hispanic or Latino Ethnicity	Race (American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or other Pacific Islander, White, Unable to Determine)
State Agency...special needs	Hispanic or Latino Ethnicity
Primary basis...special needs	Has Child Been Clinically Diagnosed with Disability (ies)
Type of Disability- Mental Retardation	Mental Retardation
Type of Disability- Visually or Hearing Impaired	Visually or Hearing Impaired
Type of Disability- Physically Disabled	Physically Disabled (Child)
Type of Disability- Emotionally Disturbed	Emotionally Disturbed (DSM-IV)
Type of Disability- Other medically diagnosed condition	Other Medically Diagnosed Conditions Requiring Special Care
Mother's year of birth	Has Child Ever Been Adopted?
Father's year of birth	If Yes, How Old Was Child When Adoption was Legalized?
Mother married	Date of First Removal from Home
Date of Mother's termination of parental rights	Total Number of Removals From Home to Date
Date of Father's termination of parental rights	Date Child Was Discharged from Last Foster Care Episode
Date adoption legalized	Date of Latest Removal from Home
Adoptive parents' family structure	Removal Transaction Date
Year of birth (Adoptive Mother)	Date of Placement in Current Foster Care Setting
Year of birth (Adoptive Father)	Number of Previous Placement Settings During this Removal Episode?
Race (Adoptive mother) same categories as above	Manner of Removal from Home for Current Removal Episode
Hispanic or Latino Ethnicity (Adoptive Mother)	Physical Abuse (alleged/reported)
Race (Adoptive Father) same categories as above	Sexual Abuse (alleged/reported)
Hispanic or Latino ethnicity (Adoptive Father)	Neglect (alleged/reported)
Relationship- Stepparent	Alcohol Abuse (parent)
Relationship- Other relative	Drug Abuse (parent)
Relationship- Foster parent	Alcohol Abuse (child)
Relationship- Other non-relative	Drug Abuse (child)
Child was placed from	Child's Disability
Child was placed by	Child's Behavior Problem
Monthly subsidy	Death of Parent(s)
Monthly amount Adoption assistance- IV-E	Incarceration of Parent(s) Caretaker's Inability to Cope Due to Illness or Other Reason

Abandonment
Relinquishment
Inadequate Housing
Current Placement Setting
Out of State Placement
Most Recent Case Plan Goal
Caretaker Family Structure
Year of Birth (1 st Principal Caretaker)
Year of Birth (2 nd Principal Caretaker)
Date of Mother's Parental Rights Termination (if applicable)
Date of Legal or Putative Father's Parental Rights Termination (if applicable)
Foster Family Structure
Year of Birth (1 st Foster Caretaker)
Year of Birth (2 nd Foster Caretaker)
Race of 1 st Foster Caretaker (same categories as above)
Hispanic or Latino Ethnicity of 1 st Foster Caretaker
Race of 2 nd Foster Caretaker (if applicable) (same categories as above)
Hispanic or Latino Ethnicity of 2 nd Foster Caretaker (if applicable)
Date of Discharge from Foster Care
Foster Care Discharge Transaction Date
Reason for Discharge
Title IV-E (Foster Care)
Title IV-E (Adoption Assistance)
Title IV-A
Title IV-D (Child Support)
Title XIX (Medicaid)
SSI or Other Social Security Benefits
None of the Above
Amount of Monthly Foster Care Payment

Appendix C

NCANDS Data Elements

REPORT DATA

1. Submission Year
2. State/Territory
3. Report ID
4. Child ID
5. County of Report
6. Report Date
7. Report Source
8. Report Disposition
9. Report Disposition Date
10. Notifications

CHILD DATA

1. Child Age at Report
2. Child Date of Birth
3. Child Sex
4. Child Race
5. Child Hispanic Ethnicity
6. County of Residence
7. Living Arrangement
8. Military Family Member
9. Prior Victim

CHILD VICTIM DATA

1. Maltreatment-1 Type
2. Maltreatment-1 Disposition Level
3. Maltreatment-2 Type
4. Maltreatment-2 Disposition Level
5. Maltreatment-3 Type
6. Maltreatment-3 Disposition Level
7. Maltreatment-4 Type
8. Maltreatment-4 Disposition Level
9. Maltreatment Death
10. Alcohol Abuse-Child
11. Drug Abuse-Child
12. Mental Retardation-Child
13. Emotionally Disturbed-Child
14. Visually or Hearing Impaired-Child

15. Learning Disability-Child
16. Physically Disabled-Child
17. Behavior Problem-Child
18. Other Medical Condition-Child
19. Alcohol Abuse-Caretaker(s)
20. Drug Abuse-Caretaker(s)
21. Mental Retardation-Caretaker(s)
22. Emotionally Disturbed-Caretaker(s)
23. Visually or Hearing Impaired-Caretaker(s)
24. Learning Disability-Caretaker(s)
25. Physically Disabled-Caretaker(s)
26. Other Medical Condition-Caretaker(s)
27. Domestic Violence
28. Inadequate Housing
29. Financial Problem
30. Public Assistance
31. Post Investigation Services
32. Service Date
33. Family Support Services
34. Family Preservation Services
35. Foster Care Services
36. Removal Date
37. Juvenile Court Petition
38. Petition Date
39. Adoption Services
40. Case Management Services
41. Counseling Services
42. Day Care Services-Child
43. Educational and Training Services
44. Employment Services
45. Family Planning Services
46. Health-Related and Home Health Services
47. Home-Based Services
48. Housing Services
49. Independent and Transitional Living Services
50. Information and Referral Services
51. Legal Services
52. Mental Health Services
53. Pregnancy and Parenting Services for Young Parents
54. Respite Care Services
55. Special Services-Disabled
56. Special Services-Juvenile Delinquent
57. Substance Abuse Services
58. Transportation Services
59. Other Services

PERPETRATOR DATA

1. Perpetrator-1 ID
2. Perpetrator-1 Relationship
3. Perpetrator-1 as a Caretaker
4. Perpetrator-1 Age at Report
5. Perpetrator-1 Sex
6. Perpetrator-1 Race
7. Perpetrator-1 Hispanic Ethnicity
8. Perpetrator-1 Military Member
9. Perpetrator-1 Prior Abuser
10. Perpetrator-1 Maltreatment-1
11. Perpetrator-1 Maltreatment-2
12. Perpetrator-1 Maltreatment-3
13. Perpetrator-1 Maltreatment-4
14. Perpetrator-2 ID
15. Perpetrator-2 Relationship
16. Perpetrator-2 as a Caretaker
17. Perpetrator-2 Age at Report
18. Perpetrator-2 Sex
19. Perpetrator-2 Race
20. Perpetrator-2 Hispanic Ethnicity
21. Perpetrator-2 Military Member
22. Perpetrator-2 Prior Abuser
23. Perpetrator-2 Maltreatment-1
24. Perpetrator-2 Maltreatment-2
25. Perpetrator-2 Maltreatment-3
26. Perpetrator-2 Maltreatment-4
27. Perpetrator-3 ID
28. Perpetrator-3 Relationship
29. Perpetrator-3 as a Caretaker
30. Perpetrator-3 Age at Report
31. Perpetrator-3 Sex
32. Perpetrator-3 Race
33. Perpetrator-3 Hispanic Ethnicity
34. Perpetrator-3 Military Member
35. Perpetrator-3 Prior Abuser
36. Perpetrator-3 Maltreatment-1
37. Perpetrator-3 Maltreatment-2
38. Perpetrator-3 Maltreatment-3
39. Perpetrator-3 Maltreatment-4

Appendix D

Interviewees

Interviewee	Tribe and Department
Louise Brady, Director	Sitka Tribe of Alaska Social Services
Tamie Finn, Director	Leech Lake Band of Ojibwe Child Welfare Program
Suzanne Garcia, Assistant Counsel	Washoe Tribe of Nevada and California
Francine Jones, Director	Tlingit & Haida Tribal Family and Youth Services
Travis Platero, Senior Programmer/Analyst	Navajo Nation
Malissa Poog, Manager	Shoshone-Bannock Health and Human Services
Wilfred Yazzie, Principal Social Worker	Navajo Nation Children and Family Services