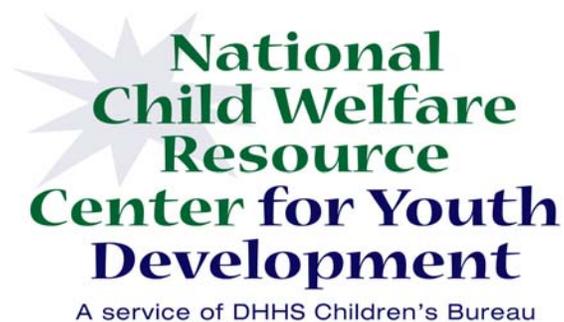


Tribal Youth Transitioning To Adulthood

Current Status of Independent Living Services Provided to Indian Youth

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Overview of the Issues

Since passage of the Foster Care Independence Act (FCIA) and implementation of the John H. Chafee Foster Care Independence Program (CFCIP) in 1999, services focused on preparing youth for a successful transition from foster care to adulthood have become a critical component of child welfare service delivery for both States and Indian Tribes. With increased funding for independent living activities and greater flexibility to decide whom to serve, States have increased the overall level of independent living services provided to young people during the past seven years. Tribes have also developed their own independent living programs to directly serve tribal youth as several States have chosen Tribes to serve as providers for independent living activities under CFCIP. Although the extent to which tribal youth have accessed independent living services remains unclear, the contention can be made that more tribal youth have received CFCIP funded benefits and services since the enactment of FCIA.

Regardless from whom tribal youth receive independent living services, accessibility and cultural responsiveness of CFCIP services remains a considerable task for state and tribal child welfare agencies. States must productively engage Tribes in the planning and delivery of CFCIP services by including Tribes in stakeholder meetings and through ongoing consultation. Tribes must ensure that CFCIP services are accessible to tribal youth and incorporate cultural beliefs, values, and skills that are necessary for tribal youth to successfully transition to adulthood, either through increased involvement in State planning processes or assumption of those services.

These responsibilities, combined with the fact that youth continue to represent a significant percentage of the total number of children in foster care and the total number exiting foster care, present an enormous challenge for States and Tribes striving to provide effective services and achieve positive outcomes for tribal youth. Consequently, strategic planning for the development and implementation of independent living programs that enhance accessibility and cultural responsiveness becomes crucial for States and Tribes in their efforts to help tribal youth successfully transition from foster care to adulthood.

Expansion of Independent Living Services

In 1999, the Chafee Foster Care Independence Program (CFCIP) replaced the Title IV-E Independent Living Initiative and provided more opportunities for young people transitioning from foster care to attain the skills, knowledge, and competencies for adulthood (Foster Care Independence Act, 1999). Foremost, CFCIP doubled the amount of funding available to States so that the level of independent living activities provided to youth would increase. Secondly, CFCIP gave States greater flexibility in deciding who to serve by not restricting eligibility to children 16 years of age or older. Finally, provisions were included to address the availability of independent living benefits and services to Indian children.

Increased Funding

Under the Independent Living Initiative, the amount of funding available to States limited the level of services that States could provide to youth in foster care and those who had left the foster care system. The U.S. General Accounting Office (1999) reported in 1999 that state independent

living programs fell short in key areas, including assistance with employment opportunities and housing or other transition assistance. To support independent living services, some States utilized additional state, local, and private funding and some States received in-kind donations such as “mentoring services, use of facilities for training, attorney services, drivers’ education training, college scholarships, books, school supplies, clothing, computers, gift certificates, and household supplies for youths” (p. 6).

Prior to 1999, the amount of funding for independent living programs was woefully inadequate. In 1998, 19 States received less than \$500,000 with Alaska receiving the least amount at \$13,071.00 (Children’s Bureau, 1998). Thirteen States received between \$500,000 and \$1 million and 11 States and the District of Columbia received between \$1 million and \$2 million. Only seven States received more than \$2 million with California receiving the most at \$12,519,177.

With the passage of FCIA, the amount of funding for independent living activities increased from \$70 million to \$140 million annually. Under CFCIP, no State receives less than \$500,000 or its 1998 allotment (Foster Care Independence Act, 1999). For Fiscal Year 2007, 16 States received between \$500,000 and \$1 million with seven States receiving the minimum amount of \$500,000 (Children’s Bureau, 2007). Fifteen States, the District of Columbia, and Puerto Rico received between \$1 million and \$2 million and 13 States received between \$2 million and \$4 million. Six States received between \$4 million and \$10 million and two States received more than \$10 million with California receiving the most at \$20,953,350.

Eligibility

In addition to providing increased funding, FCIA gave States broad discretion to define whom to serve. CFCIP defines eligible children as those who are “likely to remain in foster care until age 18” and “children aging out of foster care” (Foster Care Independence Act, 1999, §477(a)). Under the Independent Living Initiative, eligibility for independent living services was restricted to children age 16 years and older. Without a restriction on age, States have been able to assist more children in the foster care system under FCIA.

The U.S. General Accounting Office (2004) reported in November 2004 that the number of States expanding independent living services and age groups served increased considerably after the passage of FCIA. Forty States had expanded services to youth younger than they had previously served and 36 States reported serving older youth. The number of States providing “core independent living services, such as independent living skills assessments, daily living skills training, and counseling” to youth younger than age 16 years more than doubled since passage of FCIA (p. 17). Currently, 42 States provide independent living activities to some degree to youth younger than age 16 years and at least four States serve youth as young as age 12 years (National Child Welfare Resource Center for Youth Development, 2006).

Indian Children

FCIA also expanded the availability of services to Indian children. FCIA requires that the chief executive officer of a State provide a certification “that benefits and services under the

[independent living] programs will be made available to Indian children in the State on the same basis as to other children in the State” (Foster Care Independence Program, 1999, §477(b) (3) (G)). No provisions regarding Indian children were included in the Independent Living Initiative and only those tribal youth in state custody had access to independent living services before 1999. FCIA’s inclusion of tribal youth extended independent living services not only to those Indian youth in state foster care systems but to youth in tribal custody as well.

FCIA’s provisions regarding Indian children represented an important step in increasing the delivery of independent living services to tribal youth, specifically those in tribal foster care. Prior to 1999, Tribes, like States, struggled to provide basic independent living services to their youth. In 2001, citing a lack of data on available transition services for tribal youth, the National Indian Child Welfare Association and Casey Family Programs conducted a study to understand the array of services offered to help Indian youth leave foster care and begin successful adult lives.

The “Transitions Programs in Indian Country” research project provided an initial understanding of transition programs available to Indian youth within American Indian communities by examining the services provided by 67 tribal, 8 Alaskan Native, and 11 off-reservation urban child welfare agencies (Crofoot Graham, Cellarius, Clothier, Moore, & Hawkins, 2001). This study found that 41 (48%) of the Indian child welfare agencies surveyed did not provide transitional services to Indian youth ages 13 to 21 years. Thirty-five (41%) of the agencies provided some form of transition services while ten (11%) arranged for some transition services but did not have a formal program to provide transition services. The study also found that most agencies wanted to provide more formal, structured, and in-depth transition programs and expand services to include basic transition services such as life skills, social skills, mentoring, and subsidized transitional housing.

Youth in Foster Care

By expanding independent living activities, age groups served, and the availability of services to Indian children, FCIA allowed States and Tribes to better meet the needs of youth in foster care and youth leaving the foster care system. The increased opportunities offered by FCIA for young people to successfully transition from foster care to adulthood have proven crucial for States and Tribes as youth annually represent a significant percentage of the total number of children in foster care and the total number exiting foster care.

According to the Adoption and Foster Care Analysis and Reporting System (AFCARS), youth ages 13 years and older represented approximately 38% (1,227,440) of the total number of children in foster care (3,234,000) during Fiscal Years 1999-2004 (Children’s Bureau, 2006e; Children’s Bureau, 2006f; Children’s Bureau, 2006h). In 1998, the final year that States received funding for independent living programs under the Independent Living Initiative, 31% (180,960) of the 559,000 children in foster care on September 30, 1998, were ages 13 years and older (Children’s Bureau, 2006h). The percentage of youth in foster care has steadily increased since 1999 when children ages 13 years and older represented 36% (200,960) of the 567,000 children in care on September 30, 1999.

The most recent data shows that the percentage of youth in foster care continues to be substantial. On September 30, 2005, 40% (203,380) of the 513,000 children in foster care were ages 13 years and older (Children's Bureau, 2006g).

AFCARS also reported that older youth, children ages 16 years and older, represented a significant percentage of the total number of children leaving the foster care system. During Fiscal Years 1999-2004, older youth represented 22% (367,580) of the total number of all children exiting foster care (1,638,000) (Children's Bureau 2006e; 2006f; 2006h). The percentage of older youth exiting the foster care system has remained relatively the same since 1998 when this population represented 23% (59,321) of the 257,000 children who exited foster care during Fiscal Year 1998 (Children's Bureau, 2006h). According to current statistics, older youth continue to represent a significant percentage of the total number of children exiting foster care. During Fiscal Year 2005, 23% (65,411) of the 287,000 children exiting foster care were age 16 years and older (Children's Bureau, 2006g).

In addition, outcomes for the 287,000 children exiting the foster care system during FY 2005 ranged from reunification with parents (54%) to guardianship (4%) (Children's Bureau, 2006g). More than 51,000 (18%) had an outcome of adoption and almost 24,500 (9%) had an outcome of emancipation. Indian children represented 2% (5,857) of the total number (287,000) of children exiting foster care.

National statistics also continue to show that older children are less likely than younger children to have an outcome of adoption and, as a result, more likely to "age out" of the foster care system. Of the 51,000 children adopted from the foster care system during FY 2005, only 3% (1,556) were ages 16 years and older (Children's Bureau, 2006g). Also, only 1% (694) of the 51,000 children adopted was identified as American Indian/Alaskan Native. AFCARS reported that 114,000 children in foster care were waiting to be adopted on September 30, 2005. Children ages 16 years and older represented 8% (8,882) of the total number of children waiting to be adopted. This statistic did not include children 16 years old and older whose parental rights had been terminated and who had a goal of emancipation.

CFCIP Services Provided to Tribal Youth

FCIA included provisions to ensure that Indian children have equal access to CFCIP benefits and services. However, the extent to which tribal youth receive those benefits and services remains unclear. Although FCIA also included data collection requirements, a national data collection system for CFCIP has not been implemented. At the time of this publication, it is unknown how many state independent living programs maintain data on the number of tribal youth receiving independent living services.

An informal review of State Child and Family Services Plans (CFSP) for Fiscal Years 2005-2009 and Annual Progress and Services Reports (APSR) for Fiscal Years 2005 and 2006 showed that at least 14 States reported data on the number of tribal youth receiving CFCIP benefits and services. More States may collect this information but did not include the data in the CFSP, 2005 APSR, and/or 2006 APSR reviewed. Not all of these reports were reviewed for each State. However, at least one document was reviewed for each of the 50 States and the District of

Columbia. In addition, this data may have been included in other sections of the CFSP/APSR not reviewed. For purposes of this informal review, only the CFCIP section of the CFSP and/or APSR was reviewed.

According to the Bureau of Indian Affairs, there are 563 federally recognized Indian Tribes in the United States (*Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs*, 2005). Thirty-three States have at least one federally recognized Tribe located within its borders. There are no federally recognized Tribes in 17 States and the District of Columbia.

Of the 14 States having six or more federally recognized Tribes located within its borders, six included statistics on Native American youth receiving CFCIP funded benefits and services. New Mexico, with 21 federally recognized Tribes, has collected demographic data, including the number of Native American youth served, since 1999. During 2004/2005, New Mexico's independent living program provided services to 79 (13.8%) tribal youth out of 571 total youth served (New Mexico Children, Youth and Families Department, 2004). New Mexico also reported that 22 tribal youth received Semi-Independent Living maintenance checks, three tribal youth received Chafee Education and Training Voucher (ETV) Program funds and four tribal youth received start up funds during calendar year 2005 (New Mexico Children, Youth and Families Department, 2006).

Location of Federally Recognized Indian Tribes by State*

Alaska	229	Alabama	1
California	103	Iowa	1
Oklahoma	37	Massachusetts	1
Washington	29	Mississippi	1
New Mexico	21	North Carolina	1
Arizona	20	Rhode Island	1
Nevada	18	South Carolina	1
Michigan	12	Arkansas	0
Wisconsin	11	Delaware	0
Oregon	9	Dist of Columbia	0
South Dakota	8	Georgia	0
Montana	7	Hawaii	0
New York	7	Illinois	0
Minnesota	6	Indiana	0
Idaho	4	Kentucky	0
Kansas	4	Maryland	0
Louisiana	4	Missouri	0
Maine	4	New Hampshire	0
Nebraska	4	New Jersey	0
North Dakota	4	Ohio	0
Utah	4	Pennsylvania	0
Texas	3	Tennessee	0
Colorado	2	Vermont	0
Connecticut	2	Virginia	0
Florida	2	West Virginia	0
Wyoming	2	TOTAL	563

Indian Entities Recognized and Eligible to Receive Services From the United States Bureau of Indian Affairs, Bureau of Indian Affairs, Department of Interior, Federal Register, Volume 70, No. 226, November 25, 2005

In Wisconsin, where 11 federally recognized Tribes are located, the number of tribal youth receiving CFCIP services has been collected since 2002 (Wisconsin Division of Children and Family Services, 2006). In 2005, 121 (3%) tribal youth received CFCIP services out of 3,912 total youth served (p. 58). Wisconsin also provided independent living services to 23 American Indian youth who were not tribal members. Oregon's Independent Living Program provided services to 74 (6.4%) American Indian youth out of 1,161 total youth served during Fiscal Year 2004 (Oregon Children, Adults and Families Division, 2005). There are nine federally recognized Tribes located in Oregon. South Dakota, with eight federally recognized Tribes located within its borders, reported in its 2006 APSR that independent living services and activities were provided to 235 (52%) Native American youth out of 449 total youth served

during FY 2004 and the first six months of FY 2005 (South Dakota Office of Child Protection Services, 2006, p. 59).

The other States with six or more Tribes reporting the number of Native American youth that were provided CFCIP services included Nevada (18 Tribes) (Nevada Division of Child and Family Services, 2006), Oregon (9 Tribes) (Oregon Children, Adults and Families Division, 2005), and Montana (7 Tribes) (Montana Child and Family Services Division, 2006). Although it did not include statistical information, Minnesota, with six federally recognized Tribes, reported in its CFSP that “demographic data on youth served is closely analyzed to determine Minnesota’s effectiveness in equitably serving youth of different ages, genders, races, and locations in the State” (Minnesota Child and Safety Permanency Division, 2004, p. 60).

Nineteen States have one to four federally recognized Tribes located within its borders and seven of those States reported data on tribal youth receiving CFCIP services in the CFSP and/or 2005/2006 APSR reviewed. Utah, with four federally recognized Tribes, has maintained data on American Indian/Alaska Native youth participating in its Transition to Adult Living Program since 2001 (Utah Division of Child and Family Services, 2006). Maine, with four federally recognized Tribes, reported in its 2005 APSR that 8 (2.11%) Native American youth in Department of Human Services care received direct services funded by CFCIP out of a total of 380 youth served during Fiscal Year 2004 (Maine Bureau of Children and Family Services, 2005). Colorado’s independent living program provided services to 56 (4.96%) Native American youth out of 1,130 total youth served during Fiscal Year 2006 (Colorado Division of Child Welfare Services, 2006). There are two federally recognized Tribes located in Colorado.

In its CFSP, North Carolina, with one federally recognized Tribe, included results of a survey completed by counties that detailed types of services offered, outcomes, and “other data” for Federal Fiscal Years 2001-2003 (North Carolina Division of Social Services, 2005, p. 77). Other data consisted of Native American youth/Federally Recognized Tribes served. In Fiscal Year 2003, “52 Native American youth/6 Federally Recognized Tribes” received services (p. 77). Ninety-three of the 100 counties in North Carolina completed the 2003 survey to “determine whether or not adjustments need to be made” to the independent living program (p. 76). Louisiana (4 Tribes) (Louisiana Office of Community Services, 2005), North Dakota (4 Tribes) (North Dakota Children and Family Services Division, 2006), and Texas (3 Tribes) (Texas Department of Family and Protective Services, 2006) also included statistics on CFCIP services provided to American Indian youth.

Despite the absence of federally recognized Tribes in the state, the Ohio Office for Children and Families reported that its Independent Living Program served 18 (0.35%) American Indian/Alaskan Native youth out of 5,081 total youth served as of October 1, 2005 (Ohio Office for Children and Families, 2006).

In summary, as many as 36 States may not maintain data on the number of tribal youth receiving independent living services under CFCIP. Nationally, the lack of a uniform system to collect data related to outcomes for all youth served by CFCIP has impacted efforts to measure program performance, including the extent to which services benefit Indian children. Until a national data

collection and reporting system for CFCIP is implemented, the extent to which tribal youth receive CFCIP benefits and services will most likely remain unclear.

National Youth in Transition Database

In 2004, the U.S. Office of Management and Budget (2004) with the Administration for Children and Families (ACF) assessed the performance of the Chafee Foster Care Independence Program (CFCIP) and found that the program lacked “a data collection system to gather much needed information on the target population” (Rating section, bullet #3). Recommendations for program improvement included accelerated development of the National Youth in Transition Database (NYTD), a uniform data collection and reporting system. The Children's Bureau has designed and pilot tested the NYTD, which will gather data on program demographics and outcomes. The NYTD will enable the Children's Bureau to establish baseline information on the demographics and CFCIP services provided to youth in care. The Office of Management and Budget approved the Notice of Proposed Rulemaking (NPRM) for the “Chafee National Youth in Transition Database” in June 2006 and published the NPRM in July 2006.

In its NPRM, ACF proposed that States report to NYTD four types of information: (1) services; (2) characteristics; (3) outcomes; and (4) basic demographics (Chafee National Youth in Transition Database, 2006). States will be required to report the characteristics of youth receiving independent living services, including tribal membership, and basic demographics such as sex and race of youth. ACF “considers a youth's tribal membership important because section 477(b) (3) (G) of the [Foster Care Independence] Act specifically requires each State to certify that benefits and services under the programs will be made available to Indian children in the State on the same basis as to other children in the State” (p. 40354). To capture the number of Indian youth served by CFCIP, States will report whether a youth is enrolled in or eligible for membership in a federally recognized Tribe. However, ACF is not requiring that States report the name of the Indian Tribe of which the youth is a member or eligible for membership.

Although implementation of the NYTD will help in ascertaining the number of Indian children that receive CFCIP benefits and services, national data will not be available for several more years. According to a memorandum from the Congressional Research Service, the first full year of data describing the characteristics and certain outcomes of older youth will be available in calendar year 2009 (Congressional Research Service, 2006).

In addition to the lack of a national data collection and reporting system, determining the extent to which all eligible tribal youth have access to and receive independent living services may be hindered by the lack of established cooperative agreements between States and Tribes. Currently, Tribes must enter into intergovernmental agreements with States to receive access to another significant federal funding source for services to children in the foster care system.

Title IV-E Foster Care

The Title IV-E Foster Care and Adoption Assistance Program provides reimbursement for foster care and adoption services including administrative costs, maintenance payments, and training for foster/adoptive parents and staff. Congress originally intended for the Title IV-E program to

serve all eligible children in the United States, including those under tribal jurisdiction. However, the law omitted language referencing Indian Tribes and, consequently, Indian children in tribal custody do not have the same access to IV-E funding as children under State custody. In order for Indian children in tribal custody to receive Title IV-E funding, Tribes must enter into intergovernmental agreements with States. As evidenced by the fact that less than 15% of the more than 560 federally recognized Tribes have some form of a Title IV-E foster care agreement, the negotiation and implementation of these agreements are complex and can be “problematic” (Brown, Scheuler-Whitaker, Clifford, Limb, & Munoz, 2000, p. 17).

Indian Country Today reported that only 75 Tribes had entered into a Title IV-E agreement as of December 2005 (Colegrove, 2005). Nearly half of those agreements exist in Oklahoma. In 2006, 35 of the 37 federally recognized Tribes located in Oklahoma had a foster care agreement with the State of Oklahoma (Oklahoma Children and Family Services Division, 2006).

Since a majority of Tribes provide child welfare services, the number of Indian children in tribal foster care who do not have access to Title IV-E funding may be significant. During Fiscal Year 2006, 301 federally recognized Tribes and 12 tribal organizations representing 227 Tribes/villages in Alaska received federal funding for child welfare services (Children’s Bureau, 2006a). In addition to not having access to Title IV-E funding, many eligible Indian children, specifically those in the custody of Tribes who do not have Title IV-E agreements, may not have access to CFCIP benefits and services.

In relation to Title IV-E funding, several reports have recommended changes to Title IV-E including direct funding to Indian Tribes. The Pew Commission on Children in Foster Care (2004) released recommendations for reforming the nation's foster care system in May 2004. In its report "Fostering the Future: Safety, Permanence and Well-Being for Children in Foster Care," the Pew Commission recommends that Indian Tribes have the option to directly access funding for Title IV-E.

A study conducted by the George Warren Brown School of Social Work's Kathryn M. Buder Center for American Indian Studies found that American Indian children under tribal court jurisdiction are denied equal access to Title IV-E, which is “an important source of revenue for foster care and adoption in American Indian communities” (Brown et al, 2000, p. 7). The study supports a proposed amendment to Title IV-E of the Social Security Act, which would allow direct funding from the federal government to tribal communities. The proposed amendment, entitled “Child Welfare Program Option”, includes a \$30 million set-aside for Indian Tribes or consortia that can demonstrate the capacity to operate a Title IV-E program.

The President's FY 2007 budget proposes the Child Welfare Program Option, a child welfare financing option that would restructure the current Title IV-E Foster Care program (Child Welfare League of America, 2006). Under the proposal, a fixed, predetermined allocation of Title IV-E funding, including maintenance payments, administrative costs, and training funds, would be provided to States choosing this option instead of the current open-ended entitlement funding based on the number of eligible children. This proposal was also included in each of the President's Budget proposals for Fiscal Years 2004-2006.

One Tribe, Pueblo of Zuni in New Mexico, recently participated in a Title IV-E Child Welfare Waiver Demonstration project and received direct federal reimbursement for foster care maintenance, adoption assistance, subsidized guardianship, independent living, and related administrative expenses (James Bell Associates, 2006). Public Law 103-432 (Social Security Act Amendments of 1994) introduced the concept of waivers to child welfare programs. Through this provision, States were able to apply to the U.S. Department of Health and Human Services (HHS) to waive certain provisions of Titles IV-B and IV-E to develop and implement innovative programs that promoted safety and permanency for children in the child protection and foster care systems.

“To enhance tribal independence and increase the efficiency and effectiveness of child welfare services delivered to Indian children,” New Mexico implemented a waiver demonstration project that delegated the administration of Title IV-E programs to Tribes or Pueblos (James Bell Associates, 2006, §G). Under the Title IV-E waiver demonstration, New Mexico could enter into agreements with eligible Tribes and Pueblos that granted authority to the tribal and pueblo governments “to develop foster care licensure standards, license foster homes, determine the IV-E eligibility of individual children, and receive direct Federal reimbursement for foster care maintenance, adoption assistance, subsidized guardianship, independent living, and related administrative expenses” (§G). This demonstration project was completed in December 2005.

Intergovernmental Title IV-E Agreements

To access Title IV-E funding, some Tribes have entered into intergovernmental agreements with States to receive IV-E funds on a “pass through” basis for administrative and training expenses related to child welfare activities. In Alaska, the Office of Children’s Services passes through Federal Title IV-E funds for administration and training costs to nine Tribes/tribal organizations (Alaska Office of Children’s Services, 2006). The Alaska Tribal Title IV-E Reimbursement Program, authorized by Title IV-E of the Social Security Act (42 U.S.C. 672-679), is an open-ended entitlement, funded with a combination of federal and tribal matching funds. Under the Tribal Title IV-E Program, Tribes/tribal organizations receive reimbursement for activities in the categories of administration and training only. These activities are monitored through quarterly certification of expenditures, face-to-face meetings, and on-site visits. To participate in this program, Tribes and tribal organizations must have an approved five-year child welfare plan on file with Region X of Administration for Children and Families.

The Tribes/Tribal organizations in Alaska receive reimbursement primarily for case management activities. For example, the Tanana Chiefs Conference has one full time social worker providing case management activities to families and children involved in the State child welfare system and one full time foster care recruiter/licensing worker providing services to prospective and current foster/adopt families. The Tanana Chiefs Conference provides services to children and families who are either enrolled or eligible for enrollment with one of the 37 Tribes in the Tanana Chiefs Conference region. Another tribal organization, the Cook Inlet Tribal Council, operates an ICWA Help Desk in addition to providing case management for children and families involved in the State child welfare system. The ICWA Help Desk is staffed by one full time worker and is a point of contact for ICWA workers throughout Alaska and State workers needing assistance in contacting or coordinating services for Alaska Native children.

In 2005, Oregon Department of Human Services had intergovernmental Title IV-E Agreements with five Tribes: the Confederated Tribes of Grand Ronde, the Confederated Tribes of Warm Springs, the Coquille Indian Tribe, the Confederated Tribes of Siletz, and the Confederated Tribes of Umatilla (Oregon Children, Adults and Families, 2005). These agreements provide the Tribes “opportunities to develop and strengthen their child welfare departments” through access to IV-E funds, including foster care maintenance and special rate funding for children identified with special needs, administration funds, training funds with an approved training plan, adoption assistance payments, guardianship assistance payments, and independent living services (Oregon Children, Adults and Families, 2004, p. 62).

Although less than 15% of the federally recognized Tribes in the United States have Title IV-E agreements, the existence of such contracts have enabled almost 80 Tribes to provide much needed services to their children. For example, the Muscogee (Creek) Nation received approximately \$300,000 in foster care reimbursement for the 70-75 Title IV-E eligible children in tribal custody during Fiscal Year 2005 through its State/Tribal Foster Care Agreement with the State of Oklahoma (Muscogee Creek Nation Children and Family Services Administration, 2005). In addition, existing Title IV-E intergovernmental agreements serve as models for States and Tribes considering entering into contracts for the “pass through” of IV-E funding.

Until direct Title IV-E funding becomes available to Tribes, the negotiation and implementation of intergovernmental agreements remains an enormous challenge for many Tribes. States and Tribes must work collaboratively to ensure that children in tribal custody have access to all sources of federal funding. Regardless of whether Tribes receive “pass through” funding or at some point choose the option of receiving direct funding for foster and adoptive care related expenses when available, ensuring that tribal youth receive comprehensive and effective services, including independent living services, continues to be a foremost task for both States and Tribes.

Serving Tribal Youth: A Shared Responsibility

Since passage of FCIA, preparing tribal youth for a successful transition from foster care to adulthood has become a shared responsibility between the States implementing the John H. Chafee Foster Care Independence Program and the Indian Tribes advocating for their youth in both the tribal and state foster care systems. Every State provides independent living services under CFCIP to help youth, identified as those likely to remain in foster care until age 18 or those aging out of foster care, make the transition to self-sufficiency. When addressing services to Indian children, FCIA requires that a State consult with each Tribe in that State about the programs to be carried out under the State’s CFCIP plan and make efforts to coordinate the programs with the Tribes (Foster Care Independence Act, 1999).

While States are responsible for including Tribes in the development of independent living programs, Tribes have the responsibility of ensuring that independent living services provided by the States are accessible and responsive to cultural beliefs and values. To accomplish this task, Tribes must be familiar with the FCIA provisions regarding Indian children and assert their involvement in the State CFCIP planning process. By actively participating in the planning

process, tribal representatives become critical stakeholders in helping States to determine the most effective strategies for achieving positive outcomes for tribal youth.

Despite the fact that FCIA requires that States consult with Tribes in the development of their CFCIP plans, the extent of tribal involvement in this process is relatively unknown. In 2001, two years after the enactment of FCIA, the National Indian Child Welfare Association and Casey Family Programs surveyed 86 tribal child welfare agencies and found that only 43% (37) of tribal child welfare agency directors reported receiving information about FCIA and only 19.8% (17) reported receiving information from State officials (Crofoot Graham et al, 2001). Current involvement of Tribes in the consultation and development of CFCIP plans cannot be ascertained until a comprehensive review of State CFCIP plans is undertaken and even this may not show the full extent of tribal involvement.

Child and Family Services Plans

In order for States to receive CFCIP funding, as well as funding for Title IV-B and Child Abuse Prevention and Treatment Act (CAPTA) programs, a five-year Child and Family Services Plan (CFSP) must be developed and submitted to the Administration for Children and Families (ACF) (Children's Bureau, 2004). "A primary purpose of the [CFSP] is to facilitate States' integration of the programs that serve children and families," including Child Welfare Services (Title IV-B subpart 1), Promoting Safe and Stable Families Programs (Title IV-B subpart 2), Child Protective Services (CAPTA), and the *CFCIP* and *Education and Training Voucher (ETV)* programs, "into a continuum of services for children and their families" (Background section, ¶ 2). CFSP goals and objectives address the following areas: "the well-being of children and families; the needs of children and families; and the nature, scope, and adequacy of existing child and family and related social services" (Child and Family Services Plan section, ¶ 1).

Since the CFSP process began in 1994, there have been two complete five-year plan cycles: Fiscal Years 1995-1999 and Fiscal Years 2000-2004. States were required to submit a CFSP for Fiscal Years 2005-2009 by June 30, 2004 to ACF. In February 2004, ACF issued Program Instructions to provide "guidance to States on actions they [were] required to take in order to receive their allotments for fiscal year 2005... authorized under title IV-B, subparts 1 and/or 2, Section 106 of the Child Abuse Prevention and Treatment Act (CAPTA), the Chafee Foster Care Independence Program (CFCIP), and the Education and Training Vouchers (ETV) program" (Children's Bureau, 2004, Purpose section, ¶ 1). To convey how States were meeting FCIA requirements, specifically Section 477 (b)(3)(G) of the Act, ACF required that States include in the CFSP a description of the CFCIP services to be provided and address the following in the CFCIP section:

- "States should describe in detail how public and private organizations representing a wide range of stakeholders and consumers, *in particular Indian Tribes*, were consulted, and are involved in, the development of this part of the CFSP" (Chafee Foster Care Independence and Education and Training Vouchers Programs section, No. 5).
- "States should discuss their efforts...to *consult with and coordinate with 'each Indian Tribe in the State' and ensure 'that benefits and services under the program will be available to Indian children in the State on the same basis as to other children in the*

State” (Chafee Foster Care Independence and Education and Training Vouchers Programs section, No. 6).

Although CFSPs must include descriptions of how Indian Tribes were consulted and are involved in the development of independent living program plans, an informal sampling of CFSPs for Fiscal Years 2005-2009 revealed that this information was not included in all five-year plans and that descriptions varied to a large extent, ranging from very brief (a sentence or two in length) to fairly detailed (several paragraphs or more in length). This informal sampling consisted of a review of the CFCIP sections of 28 CFSPs. Other sections of the CFSPs were not reviewed. Therefore, any information regarding tribal consultation efforts related to independent living program services that States may have included in other sections are not considered (e.g., a State may have included this information in the *Indian Child Welfare Act* or *Tribal Child Welfare* sections of the CFSP).

Of the 28 CFSPs reviewed, 19 (67.9%) contained at least minimal descriptions of tribal consultation and coordination efforts; six (21.4%) did not provide a response regarding efforts at all; and three (10.7%) only stated that the absence of federally recognized Tribes within the State prevented consultation. For purposes of this review, any reference to Indian Tribes or Indian children in the CFCIP section qualified as “tribal consultation”, regardless of the quantity and/or quality of the description. Ten CFSPs were reviewed from States without any federally recognized Tribes. Of those 10, five did not make any references to tribal consultation in the CFCIP section; three acknowledged that there were no federally recognized Tribes in the State; and two addressed efforts to consult with Tribes or tribal organizations.

Several States provided very detailed accounts, including identification of Tribes, tribal representatives, or Indian organizations involved in the development of CFCIP plans by name. California, the State with the largest American Indian population at 696,633 (U.S. Census Bureau News, 2006) describes in its CFSP its utilization of the “ICWA Workgroup” as a means of consulting with the 103 federally recognized Tribes in the State (California Children and Families Services Division, 2004). The ICWA Workgroup is comprised of 20 representatives from Tribes and tribal

**American Indian/Alaska Native Population
in the United States (US Census 2000)***

1. California	696,633	27. Alabama	44,598
2. Oklahoma	401,089	28. Louisiana	44,052
3. Arizona	334,656	29. Maryland	42,457
4. Texas	252,162	30. Utah	41,838
5. New Mexico	211,933	31. Mass.	41,300
6. New York	190,169	32. Tennessee	41,058
7. Washington	166,376	33. Indiana	39,629
8. Florida	149,168	34. Arkansas	39,027
9. North Carolina	143,049	35. North Dakota	36,986
10. Alaska	124,596	36. South Carolina	29,304
11. Michigan	122,180	37. Idaho	29,297
12. Oregon	89,005	38. Connecticut	26,679
13. Colorado	85,475	39. Hawaii	25,834
14. Minnesota	83,800	40. Kentucky	24,129
15. Illinois	79,311	41. Nebraska	23,034
16. Ohio	75,304	42. Mississippi	21,049
17. South Dakota	73,178	43. Iowa	17,992
18. Wisconsin	72,136	44. Wyoming	15,582
19. Montana	69,866	45. Maine	13,276
20. Georgia	60,658	46. Rhode Island	11,736
21. Missouri	60,016	47. West Virginia	10,240
22. New Jersey	57,400	48. New Hampshire	8,238
23. Pennsylvania	56,323	49. Delaware	6,647
24. Virginia	56,129	50. Vermont	6,061
25. Nevada	52,031	51. Dist. of Col.	5,039
26. Kansas	45,935	TOTAL	4,453,660

* Estimates of the Population by Race Alone or in Combination and Hispanic or Latino Origin for the United States and States: July 1, 2005, U.S. Census Bureau Press Release, August 4, 2006

organizations as well as representatives from the Bureau of Indian Affairs, counties, and the State. In addition, California describes the collaboration between the California Department of Social Services and community partners on the Tribal Successful Transitions for Adult Readiness (STAR) project, a federally funded program that ensures that Native American youth are offered the full range of independent living program services in a culturally sensitive manner.

Oregon also provided a detailed description of how it involved the public and private sector, including Indian Tribes, in the development of its CFCIP plan (Oregon Children, Adults and Families Division, 2004). Oregon “solicited input from community partners, youth, *Tribal members*, foster parents, group home providers, DHS workers, and ILP providers” (p. 120). Representatives of four Tribes who participated in the Independent Living Program Strategic Planning Session as stakeholders were listed by name and Tribe. In addition, Oregon listed the specific groups that provided input on its Five-Year Plan, which included the following: “ILP State Advisory Committee; Child Welfare Advisory Committee and Teen Sub-committee; *ICWA Representatives*; *Nine federally recognized Tribes in Oregon*; State Foster Parent Advisory Committee; and ILP Provider Group” (p. 123).

Illinois was one of two States without federally recognized Tribes that provided a response regarding tribal consultation and coordination efforts. In its CFSP, Illinois reported that it was unable to contact Tribes for the development of the CFCIP plan but “takes its responsibility seriously to meet the needs and respect the rights of Native American youth” and planned to “explore the possibility of developing a contract with a vendor for the next fiscal year” (Illinois Department of Children and Family Services, 2004, p. 51) and share its CFCIP plan “with an organization representing the Native American population for review, comments, and recommendations, which will be considered in improving the service delivery to the Native American population” (p. 51-52).

This informal sampling of CFSPs showed that almost one-third of the 28 plans reviewed did not include descriptions of consultation efforts regarding CFCIP as required by ACF. Even if a comprehensive nationwide study of CFSPs establishes that more States reported consulting with Tribes on the development of CFCIP plans, determining the effectiveness of States’ tribal consultation efforts and its impact on the services provided to tribal youth may not be achievable through a review alone. As this sampling revealed, some descriptions of tribal consultation efforts were limited in detail and, thus, the actual context of Tribes’ involvement in the CFCIP planning process may not be accurately depicted.

To avoid exclusion or token involvement in the development of independent living programs, Tribes should initiate steps to actualize the expectations of State/Tribal consultation by taking active roles as stakeholders in the CFCIP planning process. Tribes must become familiar with FCIA requirements and be adamant about participating with States in the development of independent living program plans. The next five-year CFSP will be due by June 30, 2009 and, as States prepare to develop those plans, Tribes should be actively involved in the ongoing process of annual state evaluations of the goals and objectives contained within Fiscal Years 2005-2009 CFSPs.

Annual Progress and Services Reports

In addition to providing requirements for a five-year comprehensive CFSP, Federal regulations require annual updates on the progress made toward accomplishing goals and objectives in the CFSP (Public Welfare, 45 C.F.R. § 1357, 2002). States are required to prepare and submit to ACF yearly progress and services reports providing updates on progress for the previous fiscal year and planned activities for the upcoming fiscal year by June of each year. The Annual Progress and Services Report (APSR) must contain “a report on the specific accomplishments and progress made in the past fiscal year toward meeting each goal and objective” in the CFSP, “any revisions in the statement of [CFSP] goals and objectives”, and “a description of the child protective, child welfare, family preservation, family support, and independent living services to be provided in the upcoming fiscal year” (p. 378). The first, second, and third updates to the 2005-2009 plans have been submitted and the fourth update is due by June 30, 2008.

In preparing an APSR, an interim review must be conducted by each State and include the agencies, organizations, and individuals involved in the on-going CFSP-related consultation and coordination process (Children’s Bureau, 2006c). Examples of organizations include the State’s Court Improvement Project (CIP), faith-based and community organizations, *Tribes*, and providers.

Regarding “Chafee Independent Living Services,” the State must also explain in the APSR “the results of the Indian Tribe consultation...specifically as it relates to determining eligibility for benefits and services and ensuring fair and equitable treatment for Indian youth in care” (Children’s Bureau, 2006c, Chafee Independent Living Services section, bullet #7). According to Administration for Children and Families (ACF) Program Instruction Guidelines, this explanation must include the following:

- description of how each Indian Tribe in the State has been consulted about the programs to be carried out under the Chafee Program;
- description of the efforts to coordinate the programs with such Tribes;
- discussion on how the State ensures that benefits and services under the programs are made available to Indian children in the State on the same basis as to other children in the State; and
- a report of the Chafee benefits and services currently available and provided for Indian children and youth in fulfillment of this section and the purposes of the FCIA.

To determine States’ compliance with the federal mandates regarding annual updates on CFCIP planning consultation with Indian Tribes, one APSR, the most current report available through the Children’s Bureau Child Welfare Monitoring Documents Library, was reviewed for each State and the District of Columbia. Thirty-two (32) Fiscal Year 2006 APSRs and 19 Fiscal Year 2005 APSRs were reviewed. For purposes of this informal review, only the section regarding “Chafee Independent Living Services” was examined. A State may have reported on tribal consultation efforts related to independent living services in other sections of its APSR. This

information is not considered. The CFCIP plan for one State was not included in its APSR available through the Documents Library and, as a result, this State's APSR was excluded.

This informal review revealed that a higher percentage of States provided at least minimal responses regarding tribal consultation efforts in the yearly progress and services reports than in the 28 CFSPs reviewed. For this review, any reference to Indian children or Tribes in the CFCIP section of the APSR qualified as "tribal consultation". Of the 50 APSRs reviewed, 39 (78%) contained at least a minimal reference to "tribal consultation" efforts specifically related to independent living program services. Of those 39 APSRs, 26 (66.7%) included names of specific Tribes, tribal organizations, Indian organizations, or representatives that the State had consulted or planned to consult.

While nearly 80% of the 50 APSRs made references to Indian children or Tribes in the CFCIP section, only four (10.3 %) complied with ACF requirements when explaining the results of tribal consultation. ACF issues Program Instructions to States to "clarify and explain procedures and methods for operationalizing program policies, add details to program regulations or policy guide requirements, and convey to grantees program guidance information on actions they are expected or required to take" (Children's Bureau, n.d., Policy/Program Issuances section, bullet #4). To meet the reporting requirements under Chafee Independent Living Services, States must include the four components described above in its explanation of tribal consultation. New Mexico, with 21 federally recognized Tribes (New Mexico Children, Youth and Families Department, 2006), Michigan (12 Tribes) (Michigan Children's Services Administration, 2006), Nebraska (4 Tribes) (Nebraska Office of Protection and Safety, 2006), and Iowa (1 Tribe) (Iowa Division of Behavioral, Developmental, and Protective Services for Adults, Children and Families, 2006) listed all four components and responded to each in their APSRs.

In addition, despite the fact that federal regulations regarding reporting requirements do not distinguish between States with federally recognized Tribes and those without, only nine of the 18 States (including the District of Columbia) without federally recognized Tribes included an explanation of CFCIP related tribal consultation in the APSR reviewed. To meet CFCIP reporting requirements, those States consulted and involved representatives of Indian organizations or agencies serving Indians in the development of CFCIP plans. For example, in its 2006 APSR, Tennessee identified a contact person with the North Carolina Bureau of Indian Affairs for "future assistance" in providing Chafee independent living services to the Indian population in the State (Tennessee Department of Children's Services, 2006, p. 75).

Missouri invited representatives from the Heart of America Indian Center and the Southwest Missouri Indian Center to participate in the "Chafee stakeholder team" and intends "to actively seek input and consultation from the Indian Centers through engagement in the stakeholder team process but also through requested participation in various workgroups" in Fiscal Year 2007 (Missouri Children's Division, 2006, p. 151). Missouri also reported that "the Chafee program intends to actively seek out Indian youth who would be interested in participation on Area Youth Advisory Boards and the State Youth Advisory Board" (p. 151).

Though not expressly instructed to consult with Indian organizations or agencies representing or serving Indians, States without federally recognized Tribes should solicit input from those

entities, or similar groups, to meet ACF reporting requirements related to CFCIP. ACF does provide clarification on “tribal consultation” for States without federally recognized Tribes when reporting “on measures taken... in the past year to improve or maintain compliance with each of the five major requirements of the Indian Child Welfare Act (ICWA)” (Children’s Bureau, 2006c, Current Executive Initiatives section, #4). To meet the provisions of ICWA, ACF recommends in its Program Instructions for submission of 2006 APSRs that “States with no Federally-recognized Tribes within its borders should consult with Tribal organizations in bordering States, State-recognized Tribes and/or urban Indian Centers within the State” (#4).

To receive CFCIP funding, States must include Tribes in the planning and coordination of independent living program services on a continual basis. With States required to provide Annual Progress and Services Reports each year to ACF, Tribes have the opportunity to become actively involved in the development and implementation of independent living services provided to tribal youth. In addition to participating in the APSR process, Tribes have been afforded other opportunities to ensure availability of CFCIP benefits and services for Indian children.

Tribal Responsibility

Federal regulations requiring States to submit a five-year plan and annual progress and services reports apply to some Tribes as well. Title IV-B of the Social Security Act and Code of Federal Regulations Title 45 Parts 1357.15 and 1357.16 apply to States *and* Indian Tribes receiving funds under Title IV-B, subparts 1 and/or 2, and include the requirements for a five-year comprehensive CFSP, annual updates, and a final report on the progress made toward accomplishing the goals and objectives in the CFSP. In Fiscal Year 2006, 301 federally recognized Tribes and twelve tribal organizations representing 227 Tribes/villages in Alaska received Title IV-B, subpart 1 funding for child welfare services (Children’s Bureau, 2006a). During that same period, 82 federally recognized Indian Tribes received Title IV-B, subpart 2 funding for Promoting Safe and Stable Families Programs (Children’s Bureau, 2006b).

In Annual Progress and Services Reports due by June 30, 2006, Tribes were required to report on the specific accomplishments and progress achieved in the past fiscal year toward meeting CFSP goals and objectives for their child welfare and/or Promoting Safe and Stable Families programs. Not required previously, the Administration for Children and Families (ACF) asked that Tribes “put in writing” in the APSR their understanding of the State/Tribal consultation conducted as part of State requirements regarding CFCIP, including a report on how States have consulted with the Tribes about the activities to be carried out under CFCIP and an explanation of the results of consultation efforts (Children’s Bureau, 2006d, APSR Submission section, #4).

This opportunity to provide a tribal perspective on States’ tribal consultation efforts represents another step in determining the actual context and effectiveness of State/Tribal collaboration and its impact on CFCIP services provided to tribal youth. To assist collaborative efforts, ACF also requires States and Tribes to exchange their CFSPs and APSRs. The CFSP and APSR processes are important tools for Tribes to utilize to ensure that CFCIP services are accessible to tribal youth and that State independent living programs incorporate cultural beliefs, values, and skills that are necessary for tribal youth to successfully transition to adulthood.

While increasing involvement in State CFSP and APSR planning processes will continue to be a significant task for many Tribes, other Tribes have taken steps to ensure accessibility and cultural responsiveness of independent living services to tribal youth that extend beyond participation in state consultation efforts. Since the enactment of FCIA, more Tribes are assuming the responsibility of providing independent living services to their youth through the development of tribal independent living programs.

Tribal Independent Living Programs

Prior to 2000, the number of Tribes providing independent living services to their youth was relatively unknown. The “Transition Programs in Indian Country” research project, conducted by the National Indian Child Welfare Association and Casey Family Programs in 2001, offered an initial understanding of programs available to American Indian youth and services provided within American Indian communities. This study found that less than half of 86 Indian child welfare agencies surveyed did not provide transitional services to American Indian youth ages 13 to 21 years (Crofoot Graham et al, 2001).

The study also found that Indian Child Welfare agency directors expressed interest in potential funding available through FCIA so that transition services could be developed and provided to tribal youth. However, the study reported that less than half (43%) of the tribal child welfare agency directors had received information about FCIA. Forty-five (52.3%) of the 86 agency directors had not been provided any information about FCIA. These findings were particularly significant because FCIA has allowed States to choose providers for CFCIP activities.

In addition to the requirements for ongoing consultation and coordination between States and Tribes, FCIA increased opportunities for tribal youth to receive independent living services by allowing States to choose providers for their CFCIP activities. Under FCIA, States have total discretion on deciding who will provide independent living services. Providers may come from the public and private sectors and may include Indian Tribes. During Fiscal Years 2004 and/or 2005, at least nine of the 33 States with one or more federally recognized Indian Tribes chose Tribes to serve as providers of CFCIP services.

Chafee Funded Tribal Programs

Kansas

The four federally recognized Tribes in Kansas – Iowa Tribe of Kansas and Nebraska, Kickapoo Tribe, Prairie Band of Potawatomi Nation and Sac and Fox Nation of Missouri – received Comprehensive Social Service Grants, which range from \$85,165 to \$171,927 for the period 07/01/06 to 06/30/07, from the State to provide child welfare services, including independent living services, to tribal youth in their jurisdiction (Kansas Division of Children and Family Services, 2006). The Tribes provide independent living services to youth age 15-21 years. Services provided include “any service to promote the youth’s independence, including subsidy, adult education classes, independent living classes, and assistance with obtaining job skills” (p. 51).

Maine

In its 2005 APSR, Maine reported that it approved and signed renewal contract proposals for the provision of life skills services with the four federally recognized Tribes - two Tribes and two bands - in June 2004 (Maine Bureau of Children and Family Services, 2005). Each Tribe received CFCIP start-up funds in the amount of \$8,000 and each band received \$4,500. The Tribes and bands provide services to their youth between the ages of 14 and 21 years.

Minnesota

Tribes in Minnesota can apply for CFCIP funds using the same process as the counties in the State (Minnesota Child and Safety Permanency Division, 2004). Allocations are available to all 87 Minnesota county social service agencies and all 11 tribal social service agencies and are calculated based on formulas developed by the Advisory Committee for Minnesota's independent living program, Support for Emancipation and Living Functionally (SELF), and the Indian Child Welfare Advisory Committee. Counties and Tribes submit annual plans for use of the allocation to the Minnesota Department of Human Services. Following approval of the plan, counties and Tribes receive quarterly allocation checks. Eighty-five of Minnesota's 87 counties and three tribal social services agencies were funded in 2005 and provided independent living activities.

Montana

During Fiscal Year 2006, Montana contracted with three Tribes, Confederated Salish Kootenai, Blackfeet, and Northern Cheyenne, to provide independent living services to tribal youth (Montana Child and Family Services Division, 2006). Montana also contracted with the Tumbleweed Runaway Program to provide services to tribal youth and was in the process of establishing contracts with the Chippewa-Cree and Fort Belknap Tribes to serve three tribal reservations, which would give six of the seven federally recognized Tribes in the State the ability to provide their own independent living activities. Montana has also approached the Crow Tribe about implementing a contract and/or determining the best contractor to serve their tribal youth.

Nevada

Nevada, with 18 federally recognized Tribes, reported in its 2006 APSR that it partnered with the Stepping Stones Tribal Youth Shelter on the Fallon Paiute-Shoshone Reservation to provide independent living services to Native American youth. The Stepping Stones shelter was designated to be the recipient of CFCIP funds by the "Nevada tribal entities after lengthy consultation and deliberation" (Nevada Division of Child and Family Services, 2006, p. 62). The Stepping Stones Independent Living program provides individualized assessments, development of an independent living plan, and teaches the skills necessary for successful transition for youth 12-18 years old (Fallon Paiute-Shoshone Tribe, n.d.). Stepping Stones also received the "Tribal

portion of the State’s AB-94 funds”, which assists youth who have not achieved their basic needs but are no longer eligible for services based on age limitations (Programs: Stepping Stones section).

Oregon

The State of Oregon, through its Department of Human Services (DHS), allocated Independent Living Program Discretionary funds to each of the nine federally recognized Tribes in the State on the same basis as DHS Service Delivery Areas in 2005 (Oregon Children, Adults and Families, 2005). Each Tribe received \$1,400, which is the minimum amount for any area, to purchase items or services to assist a youth in achieving the goals of his or her transition plan.

Washington

Since 2000, the State of Washington has entered into agreements with Tribes regarding the allocation of CFCIP funds (Washington Children’s Administration, 2006). Washington designates ten percent of its total CFCIP allocation for tribal agreements and allows all federally recognized Tribes in the State an opportunity to apply for CFCIP funding through a yearly solicitation process. Washington reported in its Fiscal Year 2006 Annual Progress and Services Report that every Tribe that has requested CFCIP funds to establish their own independent living program has been approved for funding. In 2006, 21 of the 29 federally recognized Tribes in Washington had an agreement with the State to provide independent living services.

Wisconsin

Wisconsin allocates CFCIP funds to Tribes through State/Tribal agreements (Wisconsin Division of Children and Family Services, 2006). The 11 federally recognized Tribes in the State have been given the opportunity to receive CFCIP funds to operate tribal independent living programs. During Fiscal Year 2006, three Tribes, Ho-Chunk, Lac du Flambeau, and Lac Courte Oreilles, received CFCIP funds to provide independent living services to tribal youth. Tribal independent living services are coordinated with services provided by county agencies through child welfare coordination agreements called “161” agreements.

Wyoming

In 2004, Wyoming included the Arapahoe and Shoshone Tribes in the allocation of CFCIP funds (Wyoming Department of Family Services, June 2004). The two tribal social service agencies and each district in Wyoming received a percentage of the total State allocation based on the number of youth ages 14-18 years in “out of home” placements during a given time period. Each

Stepping Stones Tribal Youth Shelter

The Fallon Paiute-Shoshone Tribe in Nevada created the Stepping Stones Tribal Youth Shelter in 1994 as a temporary emergency foster care placement for at-risk and troubled Native American children ages 13 to 18 years old. The shelter has served over 700 youth from the Tribes in Nevada and neighboring States. Since its inception, Stepping Stones has expanded the scope of its services to meet the ever-changing needs of tribal communities and tribal youth, moving from a short term 30-day facility to a 90-day program that offers a comprehensive behavioral health-based array of services, including individual guidance to youth in the areas of spirituality, values, and self-esteem. Youth learn healthy alternatives to drug and alcohol use by exposure to a wide array of recreational and cultural activities with emphasis on honoring their tribal traditions and heritage.

Source: Fallon Paiute-Shoshone Tribe website.
www.fpst.org

district and the tribal social service agencies had the option to provide services directly or to contract with a private provider for the independent living services.

Choosing Tribes as providers of independent living activities has been a practical option for several States in meeting FCIA requirements regarding Indian children. With at least nine States allocating CFCIP funds to Tribes, the opportunities for tribal youth transitioning from foster care to attain the skills, knowledge, and competencies for adulthood have obviously increased since 1999. At the very least, almost 50 Tribes received CFCIP funds from States to provide independent living services to their youth during 2005 and 2006. Even though this number represents less than 10% of the 563 federally recognized Tribes in the U.S., the availability of such funding has proved to be beneficial for Tribes in at least nine States.

As States continue to make efforts to meet the requirements of FCIA, the “pass through” of CFCIP funds to Tribes remains an effective strategy for those States currently engaged in this approach and becomes a viable alternative for other States exploring methods to enhance accessibility of services to Indian children. Briefly described above, various strategies of allocating CFCIP funds to Tribes have been employed for several years. For those States considering choosing Indian Tribes as providers of independent living services, existing CFCIP Tribal/State agreements and contracts can be used to guide the negotiation process.

In addition to increasing accessibility of services to Indian children, allowing Tribes to serve as providers of independent living activities also results in increased opportunities to enhance outcomes for tribal youth. Research has shown that for services to be successful in helping youth transition to adulthood, programs must demonstrate cultural competence, one of “four core principles” identified as essential to improving outcomes for youth in foster care. While State independent living programs most often address issues of cultural diversity through various approaches that can have limitations, services provided by tribal programs can readily meet the specific cultural needs of tribal youth.

Cultural Responsiveness

In 1997, the National Child Welfare Resource Center for Youth Development and the National Child Welfare Resource Center for Organizational Improvement conducted a study to determine the characteristics of successful independent living and transitional living programs. This study found that programs providing effective services to youth exhibited four core principles: (1) positive youth development; (2) collaboration with other community agencies and individuals; (3) *cultural competency*; and (4) permanent connections (Sheehy et al, 2002). By providing services characterized by these four elements, independent living programs were more likely to improve outcomes for all youth in foster care.

To demonstrate cultural competence, programs must respect cultural differences and understand the impact of cultural diversity on the delivery of services. Cultural competency, as defined by Green and Leigh (1989), is “the ability of the service provider to give assistance to clients in ways that are acceptable and useful to them.” Programs also must realize that culture is more than simply identification with a race or ethnicity. Other aspects of culture include

“religion/spirituality, gender, physical ability, language, beliefs, values, behavior patterns, and customs” (Family and Youth Services Bureau, 1994, p. 7).

From “The Contribution of Ethnographic Interviewing To Culturally Competent Practice,” CASCW Practice Notes, Center for Advanced Studies in Child Welfare, University of Minnesota, Issue No. 10, Winter 2001, p. 2:

- ❖ The culturally competent worker values and respects the uniqueness of cultures, and is cognizant of the fact that cultural differences have an impact on service delivery particularly when there is a conflict between the values of the minority group and dominant culture.
- ❖ Ethnography is a means to culturally competent delivery of social services. Effective and culturally appropriate communication is necessary to engage clients. Ethnographic interviewing incorporates techniques that take into account the context of ethnically diverse clients and seek to understand their experiences and perceptions.
- ❖ The practitioner needs to understand their position as outsider, as someone who is looking for information that the client can provide about their own experiences and the meaning they have within their own culture.

Sources:

Leigh, J.W. (1998). *Communicating for Cultural Competence*. Needham Heights, Massachusetts, Allyn & Bacon;

Walker, P.J. (1997). *Effects of Training Child Welfare Social Workers in the Joint Application of Risk Assessment and Ethnographic Interviewing*. Masters Thesis, University of California, Los Angeles.

Generally, States have addressed issues of cultural diversity by collaborating with cultural experts (e.g., consulting and coordinating with Tribes when developing independent living programs, as described previously) and hiring workers of various races and ethnicities. According to the National Association of Social Workers (NASW, 2001), a “Diverse Workforce” is one of seven standards that “encourage cultural competence among all social workers so that they can respond effectively, knowledgeably, sensitively, and skillfully to the diversity inherent in the agencies in which they work and with the clients and communities they serve” (p. 14). Through recruitment, hiring, and retention efforts that promote diversity within the workforce, social services agencies maintain and improve the quality of culturally competent services.

Employing workers knowledgeable about diverse cultures is an effective approach for State agencies striving to provide services that are acceptable and useful to culturally diverse client populations. However, this strategy “for bridging cultural differences between social worker and client” (NASW, 2001, p. 25-26) has limitations that State agencies most likely realize. Despite the social work profession’s “commitment to diversity, inclusion, and affirmative action” (p. 25), NASW reported that statistics during the past decade indicate that social workers in the United States have been predominantly White.

In a 1997 study of NASW membership by Gibelman and Schervish (1997), 88.5% of social workers identified themselves as White. The percentages of social workers identifying themselves as a race/ethnicity other than White were as follows: 5.3% identified themselves as African American; 2.8% as Hispanic; 1.7% as Asian/Pacific Islander; and 0.5% as American Indian/First Nations People.

More recent statistics show that the majority of social workers in the United States continue to be identified as White. Results of a survey conducted in 2004 by NASW (2006) in collaboration with the Center for Health Workforce Studies found that 85% of licensed social workers in the U.S. were predominantly non-Hispanic White. This study was based on responses to a survey of a random sample of more than 10,000 licensed social workers out of more than 254,000 social workers licensed to practice in 48 States and the District of Columbia. The response rate to this survey was 49.4%.

As research indicates, the diversity of the workforce primarily responsible for providing services to youth in foster care has been relatively uniform over the past ten years. With almost nine out of every ten social workers in the U.S. identified as White, diversifying the workforce to maintain and improve the quality of culturally competent services appears to be a difficult undertaking within itself. Consequently, meeting the specific cultural needs of all youth in foster care becomes even more challenging for State agencies.

Diverse Populations

Although the definition of culture extends beyond basic demographic information, the standard measure for cultural diversity has been race and ethnicity. According to the Children's Bureau (2006e; 2006f; 2006g; 2006h), 62% of the children in foster care from 1998 to 2005 were identified as a race other than White. During Fiscal Year 2005, 292,692 (57%) of the 513,000 children who entered foster care were identified as American Indian/Alaskan Native, Asian, Black, Hawaiian/Pacific Islander, Hispanic, or "Two or More-Non Hispanic" (2006g). Children identified as White represented 41% (208,537) of the total number of children in foster care during the same period.

The diversity of children in foster care (62% non-White) has been significantly greater than the diversity of the social work profession (10-15% non-White) since 1998. This disparity has required States to be especially diligent in their efforts to provide culturally responsive services. When other aspects of culture such as language, customs, and spirituality are also taken into account, responding "effectively, knowledgeably, sensitively, and skillfully" to the diverse population of youth in foster care is understandably complex.

In addition to a diverse foster care population, the increasing diversity of the United States population has also impacted States' efforts to provide culturally competent services. According to the U.S. Census Bureau, the minority population grew 11 times as rapidly as the White non-Hispanic population between 1980 and 2000 (Hobbs & Stoops, 2002). In general, Blacks, Asians/Pacific Islanders, American Indians/Alaska Natives, and Hispanics have represented increasing shares of the national population.

The diversity of the foster care and U.S. populations will undoubtedly continue to affect the efforts of State agencies in delivering services that meet the cultural needs of all youth in foster care. Workforce diversification and solicitation of input from cultural experts are strategies that States should sustain to address issues of cultural diversity. However, to enhance outcomes for foster care youth, States must also explore other approaches that increase opportunities for youth

to receive culturally competent services. One such approach is the allocation of CFCIP funds to Tribes for the provision of independent living services to tribal youth.

Tribal Programs Provide Cultural Services

Despite the fact that only 2% (10,617) of the 513,000 children in foster care on September 30, 2005 were identified as American Indian/Alaskan Native (Children's Bureau, 2006g), the delivery of culturally competent services to this population is particularly important for State independent living programs due to the FCIA provisions requiring the involvement of Tribes in program development. At the same time, FCIA also presents additional opportunities for tribal youth to receive culturally competent services by allowing States to choose Tribes as providers of independent living activities. Through the allocation of CFCIP funds to Tribes, States not only ensure the accessibility of independent living services to Indian children but also enable tribal youth to receive services that readily meet their specific cultural needs.

Research has shown that Tribes implementing independent living programs offer services that incorporate the cultural beliefs, values, and skills necessary for tribal youth to successfully transition to adulthood (Crofoot Graham et al, 2001). The "Transition Programs in Indian Country" study conducted by the National Indian Child Welfare Association and Casey Family Programs in 2001 found that "cultural awareness services are consistently offered by most tribal programs, off-reservation urban programs, and Alaskan Native programs" (p. 9). These services were found to be "a major strength of Indian child welfare [programs]...because mainstream programs have been found to lack culturally appropriate services" (p. 9).

According to literature cited by Crofoot Graham et al (2001), Indian child welfare agencies provide services that emphasize connections to family and community resources. Through these connections, Indian youth can connect or re-connect to their tribal culture by becoming active in "tribal life." Ramasamy (1996) describes becoming active in tribal life as participation in family chores and engagement in cultural and spiritual activities and ceremonies. Additionally, Ramasamy contends that becoming active in tribal life is an indicator of a successful transition into adulthood for Indian youth.

For tribal youth leaving foster care, establishing and maintaining connections to family, community, and cultural resources are paramount in efforts to enhance their outcomes. When providing services to foster care youth, Indian child welfare programs can offer the cultural resources necessary for youth to successfully transition to adulthood. According to McMahon and Gullerud (1995), cultural resources provided by Indian child welfare agencies include family support and foster home recruitment. Placement of an Indian youth in a tribal foster home is advantageous because of the Indian foster parent's connections to family, community, and culture. In a culturally appropriate foster care placement, an Indian youth can learn or retain the skills needed to connect or re-connect with families and supportive communities (Mannes, 1993).

Access to family, community, and cultural resources is a principal component of service delivery for Indian child welfare programs. As reported in the "Transition Programs in Indian Country" study, the service category discussed the most by Indian child welfare representatives was

cultural awareness services. The provision of services that enable youth to remain connected to their tribal culture and heritage is extremely important for Indian child welfare agencies. For this reason, the option of allocating CFCIP funding to Tribes represents an obvious and practical approach for States when addressing cultural diversity as well as involvement of Tribes in program development and accessibility of services to Indian children.

Regardless from whom tribal youth receive independent living services, State and Tribal child welfare agencies must ensure that Chafee Foster Care Independence Program (CFCIP) services are accessible and culturally responsive to Indian youth. To provide effective services, current strategies for the involvement of Tribes in the planning and delivery of independent living services must continue to be utilized and, when necessary, evaluated and adapted to improve results. Likewise, the “pass through” of Chafee funds to Tribes should continue to serve as a strategy for enhancing accessibility and cultural competency of services available to tribal youth. Until direct CFCIP funding becomes available to Tribes, consultation, coordination and the “pass through” of Chafee funds will remain the foremost methods for tribal youth to receive the services that were made available as a result of the Foster Care Independence Act.

Strategies for Improving State/Tribal Consultation Efforts

For most Tribes, consultation and coordination with States will be the only option to ensure that independent living services are accessible and culturally responsive to tribal youth. Based on the findings of the informal reviews of 2005-2009 Child and Family Services Plans (CFSPs) and 2005/2006 Annual Progress and Services Reports (APSRs) in this report, tribal consultation and coordination efforts and the reporting of those efforts in CFSPs and APSRs must be more thoroughly and accurately addressed. Despite federal mandates requiring that CFSPs and APSRs include descriptions and discussions of tribal consultation efforts and results, this information was not included in every five-year plan and annual update reviewed. In addition, descriptions and discussions varied in content and most failed to follow Administration for Children and Families (ACF) Program Instruction Guidelines for reporting the results of tribal consultation.

Considering that the informal reviews conducted for this report have limitations, a conclusive determination of the reasons for wide-ranging, inadequate, or absent responses can not be offered. However, an obvious assumption can be made that some States are either failing to engage Tribes or failing to include results of tribal consultation in five-year plans and yearly reports as required. The contention that States are not reporting required information is further supported by ACF’s acknowledgement in 2005 that current CFSPs did not contain all required information.

In its Program Instruction (PI) providing guidance to State agencies for the June 30, 2005 submission of the Annual Progress and Services Report required under Title IV-B of the Social Security Act, the Child Abuse Prevention and Treatment Act, and the Chafee Foster Care Independence Program, ACF “noticed that the CFSPs may not contain all of the information that is required” by federal law and regulation (Children’s Bureau, 2005, Background section, ¶ 2). ACF stated in its PI that the “Regional Offices will be working with States to assure that the information submitted to ACF adequately addresses the information required before approving

the plan and forwarding the State's request for funding to Central Office” (Background section, ¶ 2).

As ACF takes steps to monitor the quality of plans, States and Tribes can take steps to improve consultation and coordination efforts. To satisfy the requirements of federal law and regulation and to ensure that services are accessible and culturally responsive, States should productively engage Tribes in the planning and delivery of CFCIP services by building partnerships with Tribes and Indian organizations or agencies representing or serving Indian children, youth, and families. To avoid exclusion or token involvement in the development of independent living programs and to make certain that services meet the cultural needs of tribal youth, Tribes should be proactive in the CFCIP planning process by establishing and maintaining avenues for communication with State independent living program coordinators and staff.

In addition, existing intergovernmental agreements and partnerships between States and Tribes can be utilized to strengthen consultation and coordination efforts in the planning and delivery of independent living services. To meet the requirements of the Indian Child Welfare Act (ICWA), many States have entered into ICWA agreements and developed collaborations with tribal child welfare agencies. States and Tribes have also entered into Title IV-E agreements that provide opportunities for Tribes to develop and improve their child welfare services. In December 2005, 75 Tribes had entered into Title IV-E agreements with States (Colgrove, 2005). Agreements between States and Tribes establishing conditions for compliance with ICWA or the provision of preventative, foster care, and adoption services can be readily expanded to include steps for the planning and delivering of CFCIP program services.

Many strategies for and examples of effective coordination between States and Tribes exist. The National Child Welfare Resource Center for Organizational Improvement published a Fact Sheet in 2005 that offers strategies for effective State/Tribal partnerships and examples of State/Tribal partnerships. This Fact Sheet is found at <http://muskie.usm.maine.edu/helpkids/rcpdfs/tribal.pdf> and is included in Appendix A.

Guidance for defining, establishing, and enhancing coordination with Tribes is also provided by the U.S. Department of Health and Human Services (2005). On January 21, 2005, the Department of Health and Human Services (HHS) released a new Tribal Consultation Policy that supports the unique relationship that exists between American Indian and Alaska Native Indian Tribes and the Federal Government. This policy acknowledges that “an integral element of this government-to-government relationship is that consultation occurs with Indian tribes” (p. 2) and that this consultation must be “open, continuous, and meaningful” (p. 1). Under this policy, all divisions of HHS are required to consult with Indian Tribes on new and existing policies, programs, functions, services, and activities that have Tribal implications. The Tribal Consultation Policy defines “consultation” and provides criteria for tribal consultation. This policy can be accessed at www.hhs.gov/ofta/docs/FnlCnsltPlyw1.pdf.

When exploring strategies for developing and improving consultation processes, States and Tribes should utilize existing partnerships, agreements, and any other available resources that will enhance those efforts. One such resource available to States and Tribes is training and technical assistance. For States administering HHS programs, services, and funding for the

benefit of Indian Tribes, methods for tribal consultation must be developed before taking any actions that directly affect Indian Tribes (U.S. Department of Health and Human Services, 2005). To assist in the consultation process, HHS Regional Offices are responsible for facilitating collaboration between States and Indian Tribes and providing technical assistance to States and Tribes for the consultation process. HHS also provides technical assistance to States in developing plans that allow for consultation that is meaningful and consistent with the Tribal Consultation Policy's definition of "consultation."

HHS provides training and technical assistance to States and Tribes through National Resource Centers, which are funded by the Children's Bureau, within ACF. Each National Resource Center provides on-site training and technical assistance to States, Tribes, and public child welfare agencies in various areas, including organizational improvement, child protective services, and youth development. This training and technical assistance is provided at no cost to State and Tribal child welfare agencies. For information on the National Resource Centers and training and technical assistance, States and Tribes should contact their HHS Regional Office. Additional information can also be found at www.acf.hhs.gov/programs/cb/tta.

Developing, improving, and maintaining effective consultation will continue to be the main objective for States and many Tribes when addressing the accessibility and cultural responsiveness of independent living services. For those States and Tribes that have moved beyond consultation, ensuring the efficiency of CFCIP services provided by tribal independent living programs becomes the primary objective. To accomplish this task, the methods utilized by States to "pass through" CFCIP funds to Tribes must be sustained, evaluated, and modified when necessary to improve outcomes for tribal youth.

Strategies for Developing Tribal Independent Living Programs

Similar to the strategies recommended for improving State/Tribal consultation efforts, States and Tribes should exploit existing partnerships, agreements, and available resources to sustain methods for the "pass through" of CFCIP funds. Although the allocation of Chafee funds to Tribes goes beyond the minimum requirements of FCIA, consultation and coordination between States and Tribes remain an important component in the negotiation and evaluation of "pass through" agreements. When negotiating agreements, States and Tribes must engage in "open, continuous, and meaningful" conversation to determine the most appropriate conditions, formulas, and expectations for the allocation of funds and delivery of services. Through on-going consultation and coordination efforts, States and Tribes can regularly evaluate the effectiveness of agreements and make necessary changes that allow for the successful delivery of independent living services to tribal youth.

For those States and Tribes that are considering or are in the process of negotiating "pass through" agreements, the various approaches that have been implemented should serve as guides in the negotiation process. As previously summarized in this report, States and Tribes have employed several methods for the allocation of CFCIP funds. States have generally allocated Chafee funds to Tribes through State/Tribal agreements. One "pass through" method that has been utilized is a yearly solicitation process through which Tribes can apply for funds. A few States have allocated funds to each tribal child welfare agency in the state based on the same

formulas used to distribute funds to county child welfare agencies and other independent living service providers. The Tribes in Nevada used a unique approach for the allocation of funds and provision of independent living services to tribal youth. Following lengthy consultation and deliberation, the Nevada Tribes designated one tribal agency to be the recipient of Chafee funds and the provider of CFCIP services.

To learn more about existing State/Tribal agreements, independent living coordinators or Chafee program managers in the States allocating CFCIP funds to Tribes can be contacted. A current list of state coordinators and program managers can be found at www.nrcys.ou.edu/yd.

Clearly, the allocation of Chafee funds to Tribes results in increased opportunities to enhance the accessibility and cultural competency of independent living services available to tribal youth. For tribal youth leaving foster care, establishing and maintaining connections to family, community, and cultural resources are paramount in efforts to enhance their outcomes. When providing services to foster care youth, tribal independent living programs can offer the cultural resources that help youth to successfully transition to adulthood. In addition to teaching the skills needed to connect or re-connect with families and supportive communities, Tribes must ensure that programs also teach skills in other important life skill areas such as housing/money management, career planning, work life, and work and study skills.

In a study conducted by Portland State University and Casey Family Programs to assess cultural life skills needed by American Indian youth to leave foster care and successfully transition to adulthood, researchers found that there is an increasing need for young people to learn money management skills. Long, Downs, Gillette, & Kills in Sight (2006) reported that American Indian youth, elders, and community practitioners participating in this study considered “skills associated with banking, financial aid, savings, rental agreements, and credit ratings...as critical for young people” (p. 298). As tribal communities develop business enterprises and expand economic development programs such as tribal casinos and the entertainment industry, employment opportunities that allow American Indian youth to remain in their communities increase but also require an investment in financial life skills as well as higher education skills levels.

With the booming expansion of the Indian gaming industry in recent years, work and study skills (i.e., understanding the importance of education and its relationship to employment) have become important life skills for young people in many tribal communities. Indian Country Today reported in July 2006 that there were 408 Indian gaming facilities nationwide, operated by 223 Indian Tribes in 28 States (Werner, 2006). As Tribes seek to employ individuals with the necessary education skills levels, colleges across the country have added courses related to casino gaming, marketing, customer service, and leadership. San Diego State’s College of Extended Studies established a certificate program in casino gaming in 2003 “because of an increasing demand for qualified casino workers by local tribes” (Cruz, 2005, ¶ 6). The Northeast Wisconsin Technical College (2007) offers an Associate Degree in Native American Gaming-Casino Management to prepare students to “operate and manage the dynamics of the gaming industry” (p. 144).

For tribal youth to receive the services that will enable them to successfully transition to adulthood, tribal independent living programs must teach life skills that are relevant to their communities (e.g., skills to connect to family, spiritual, and community resources) as well as those life skills that are necessary for youth pursuing vocational, educational, and employment opportunities outside their communities (e.g., work and study skills). To provide effective services, Tribes must ensure that their independent living programs teach the life skills that enhance outcomes for tribal youth living in two worlds. According to Long et al (2006), Native youth need to learn cultural life skills that “enhance living in both worlds – American Indian and the global Euro-American world” (p. 301), such as money management skills. As most participants in the Long et al study agreed, “Native youth need to become adept at money management skills if they are to survive in both worlds” (p. 301).

To assist Tribes in their efforts to develop independent living programs that effectively teach comprehensive life skills to tribal youth, HHS provides opportunities for training and technical assistance in program development through the National Resource Centers. One such center is the National Child Welfare Resource Center for Youth Development (NCWRCYD), which provides on-site training and technical assistance in enhancing the services provided through CFCIP and building a positive youth development framework for the delivery of services. Tribes should contact their HHS Regional Office for more information on training and technical assistance. Additional information can be found at www.acf.hhs.gov/programs/cb/tta and www.nrcys.ou.edu/yd.

NCWRCYD is also a training provider fully authorized by Casey Family Programs to deliver comprehensive training on the Casey Life Skills tools and products. The Casey Life Skills tools are resources designed to help young people prepare for adulthood and include the Ansell-Casey Life Skills Assessments, learning plans, and resource curriculum guides. The assessments evaluate the skills of youth and young adults in nine domains: career planning, communication, daily living, home life, housing and money management, self care, social relationships, work life, and work and study skills. For youth and young adults who have specific life skills needs, assessment supplements, including the American Indian Assessment Supplement, are also available. Information on the Casey Life Skills tools can be found at www.caseylifeskills.org.

Conclusion

With the passage of the Foster Care Independence Act and implementation of the John H. Chafee Foster Care Independence Program in 1999, tribal youth have been afforded more opportunities to receive the services necessary for a successful transition from foster care to adulthood. As efforts have been made to meet the FCIA provisions regarding Indian children, services focused on enhancing the outcomes for tribal youth leaving foster care have become a critical component of child welfare service delivery for both States and Indian Tribes during the past seven years. Consequently, the task of preparing tribal youth to successfully transition to adulthood has become a shared responsibility between States and Tribes as they strive to provide effective services and achieve positive outcomes for Indian youth.

In meeting the requirements of FCIA, States and Tribes have employed various strategies for ensuring that independent living services are accessible and culturally responsive to tribal youth.

Consultation and coordination between States and Tribes and the “pass through” of Chafee funds remain the foremost strategies to ensure that tribal youth receive services that are accessible and meet their specific cultural needs. For tribal youth to receive effective services, States and Tribes must engage in consultation that is “open, continuous, and meaningful” when addressing the planning and development of State and Tribal independent living programs.

As State and Tribal child welfare agencies strive to achieve positive outcomes for tribal youth, consultation and coordination will remain key factors in their efforts to help tribal youth learn the skills necessary to become successful adults. States must productively engage Tribes in the planning and delivery of CFCIP services through partnerships with Tribes and Indian organizations or agencies representing or serving Indian children, youth, and families. To avoid exclusion or token involvement in the development of independent living programs, Tribes should be actively involved in the ongoing process of yearly state evaluations (Annual Progress and Services Reports) of the goals and objectives contained within Fiscal Years 2005-2009 Child and Family Services Plans.

Current strategies for State/Tribal consultation and the allocation of Chafee funds to Tribes must continue to be utilized and improved when necessary. When exploring new strategies for developing, implementing, and improving the independent living services provided to tribal youth, States and Tribes must utilize the resources that are readily available. Existing partnerships and agreements between States and Tribes and training and technical assistance are valuable resources that will enhance efforts to improve services and outcomes for tribal youth.

As the foster care and U.S. populations become increasingly diverse, assuring that independent living services are accessible and culturally responsive to all foster care youth become more complex for State child welfare agencies. When addressing the cultural competency of services provided to tribal youth, aspects of culture such as language, customs, and spirituality for more than 560 federally recognized Tribes must be considered. Consequently, to achieve positive outcomes for tribal youth, States and Tribes must continue to improve consultation and coordination efforts, maintain the “pass through” of CFCIP funds, and implement innovative strategies to ensure that independent living services provided to tribal youth are accessible, meet their specific cultural needs, and teach the life skills that will enable them to successfully transition to adulthood.

References

- Alaska Office of Children's Services. (2006). *Annual Progress and Services Report: Title IV-B Child and Family Services Plan; Child Abuse Prevention and Treatment State Plan; Chafee Foster Care Independence Program*. State of Alaska Department of Health and Social Services.
- Brown, E., Scheuler-Whitaker, L., Clifford, C., Limb, G., & Munoz, R. (2000). *Tribal/State Title IV-E Intergovernmental Agreement: Facilitating Tribal Access to Federal Resources* [Electronic Version]. Portland, OR: National Child Welfare Association. Seattle, WA: Casey Family Programs. St. Louis, MO: Washington University.
- California Children and Family Services Division. (2004). *California Title IV-B Child and Family Services Plan: Federal Fiscal Year 2005-2009*. State of California Department of Social Services.
- Center for Advanced Studies in Child Welfare. (2001, Winter). The contribution of ethnographic interviewing to culturally competent practice. *CASCW Practice Notes*, 10 (2). Minneapolis, MN: University of Minnesota. Retrieved March 23, 2007 from http://ssw.che.umn.edu/img/assets/11860/Practicnotes_10.pdf
- Center for Health Workforce Studies & NASW Center for Workforce Studies. (2006, March). *Licensed Social Workers in the United States 2004, Chapter 1 of 4, Overview* [Electronic Version]. Rensselaer, NY: University at Albany. Washington, D.C.: National Association of Social Workers. Retrieved March 23, 2007 from <http://workforce.socialworkers.org/studies/fullStudy0806.pdf>
- Chafee National Youth in Transition Database; Proposed Rule. *Federal Register* 71:135, 40345-40382 (14 July 2006). Available: http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?dbname=2006_register&position=all&page=40345
- Child Welfare League of America. (2006, February). *President's 2007 Budget and Children: Child Welfare Financing*. Retrieved February 5, 2007 from <http://www.cwla.org/advocacy/budgetchildren07.htm>.
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (1998, October 15). *Information Memorandum, Attachment: Fiscal Year 1998 Final Allotments for Title IV-E Independent Living Program (ACYF-IM-CB-98-05)*. Retrieved November 11, 2006 from http://www.acf.hhs.gov/programs/cb/laws_policies/policy/im/im9805a.htm
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2004, February 2). *Program Instruction: June 30, 2004 Submission of: (1) the Child and Family Services Plan (CFSP) Final Report; (2) the fiscal years (FYs) 2005-2009 Child and Family Services Plan for Child Welfare Services and Promoting Safe and Stable Families Programs, the Child Abuse Prevention and Treatment State Plan; and the Foster Care Independence and the*

Education and Training Voucher Programs; and (3) the CFS-101, Parts I and II, Annual Budget Request and Annual Summary of Child and Family Services (ACYF-CB-PI-04-01). Retrieved January 4, 2006 from

http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2004/pi0401.htm

Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2005, April 29). *Program Instruction: June 30, 2005 Submission of the Annual Progress and Services Report (APSR) required under Title IV-B of the Social Security Act (the Act), the Child Abuse Prevention and Treatment Act (CAPTA), and the Chafee Foster Care Independence Program (CFCIP), including the Education and Training Vouchers (ETV) program; and the CFS-101, Parts I and II, Annual Budget Request and Annual Summary of Child and Family Services (ACYF-CB-PI-05-04).* Retrieved January 4, 2006 from

http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2005/pi0504.htm

Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006a, May 16). *Program Instruction, Attachment A: Title IV-B Subpart 1 – Child Welfare Services; Tribal Child Population and Federal Share of Funds; Fiscal Year (FY) 2006 Allotments (ACYF-CB-PI-06-04).* Retrieved January 3, 2007 from

http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2006/pi0604a.pdf

Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006b, May 16). *Program Instruction, Attachment B: Final FY 2006 Tribe Allocations; Title IV-B Subpart 2; Promoting Safe and Stable Families (ACYF-CB-PI-06-04).* Retrieved January 3, 2007 from

http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2006/pi0604b.pdf

Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006c, May 16). *Program Instruction: Submission of the Annual Progress and Services Report (APSR) on June 30, 2006, as required under Title IV-B of the Social Security Act, the Child Abuse Prevention and Treatment Act (CAPTA), and the Chafee Foster Care Independence Program (CFCIP), including the ETV program; including the submission of the CFS-101, Parts I and II, Annual Budget Request and Annual Summary of Child and Family Services (ACYF-CB-PI-06-03).* Retrieved November 11, 2006 from

http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2006/pi0603.htm

Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006d, May 16). *The June 30, 2006 submission of the Annual Progress and Services Report (APSR) as required under Title IV-B of the Social Security Act, including the submission of the CFS-101, Parts I and II, Annual Budget Request and Annual Summary of Child and Family Services (ACYF-CB-PI-06-03).* Retrieved January 4, 2007 from

http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2006/pi0604.htm

- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006e, June). *The AFCARS Report: Interim FY 2003 Estimates as of June 2006* (Report #10). Retrieved November 14, 2006 from http://www.acf.hhs.gov/programs/cb/stats_research/afcars/tar/report10.htm
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006f, June). *The AFCARS Report: Preliminary FY 2004 Estimates as of June 2006* (Report #11). Retrieved November 14, 2006 from http://www.acf.hhs.gov/programs/cb/stats_research/afcars/tar/report11.htm
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006g, September). *The AFCARS Report: Preliminary FY 2005 Estimates as of September 2006* (Report #13). Retrieved November 14, 2006 from http://www.acf.hhs.gov/programs/cb/stats_research/afcars/tar/report13.htm
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2006h, October). *The AFCARS Report: Final Estimates for FY 1998 through FY 2002* (Report #12). Retrieved November 14, 2006 from http://www.acf.hhs.gov/programs/cb/stats_research/afcars/tar/report12.htm
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (2007, February 28). *Program Instruction; Attachment A (4): FY 2007 Allocations Chafee Foster Care Independence Program (ACYF-CB-PI-07-05)*. Retrieved October 8, 2007 from http://www.acf.hhs.gov/programs/cb/laws_policies/policy/pi/2007/pi0705a4.pdf
- Children's Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (n.d.). *Laws & Policies: Policy/Program Issuances: Program Instructions (PI)*. Retrieved January 17, 2007 from http://www.acf.hhs.gov/programs/cb/laws_policies/index.htm
- Colgrove, L. (2005, December 30). Title IV-E Funding Can Help Save Indian Children. *Indian Country Today*. Retrieved January 22, 2007 from <http://www.indiancountry.com/content.cfm?id=1096412179>
- Colorado Division of Child Welfare Services. (2006). *Annual Progress and Services Report; FY 2007-2008 Five Year Plan*. State of Colorado Department of Human Services.
- Congressional Research Service. (2006, August). *Notice of Proposed Rule Making to Implement the Chafee Foster Care Independence Act Database*. Washington, D.C.

- Crofoot Graham, T.L., Cellarius, K., Clothier, P., Moore, L., & Hawkins, J. (2001). *Transition Programs in Indian Country*. Seattle, WA: Casey Family Programs. Retrieved November 11, 2006 from <http://www.nicwa.org/resources/catalog/research/2001/05.Transitions01.Rpt.pdf>
- Cruz, M. (2005, April). San Diego County's Indian gaming industry poised for more growth. *San Diego Metropolitan Uptown Examiner and Daily Business Report*. Retrieved March 30, 2007 from <http://www.sandiegometro.com/2005/apr/gaming.php>
- Family and Youth Services Bureau, Administration on Children, Youth and Families, Administration for Children and Families, U.S. Department of Health and Human Services. (1994). *A Guide to Enhancing Cultural Competency of Runaway Homeless Youth Programs* [Electronic Version]. Silver Spring, MD.: Johnson, Bassin, & Shaw, Inc. Retrieved January 6, 2007 from http://eric.ed.gov/ERICDocs/data/ericdocs2/content_storage_01/0000000b/80/22/5d/a3.pdf
- Foster Care Independence Act of 1999*, Pub. L. No. 106-169 (H.R. 3443), 113 Stat. 1822 (1999). Available: http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=106_cong_bills&docid=f:h3443enr.pdf
- Gibelman, M. & Schervish, P.H. (1997). *Who we are: A second look*. Washington D.C.: NASW Press.
- Green, J.S. & Leigh, J.W. (1989). Teaching ethnographic methods to social service workers. *Practicing Anthropology*, 11(3), 8-10.
- Hobbs, F. & Stoops, N. (2002, November). U.S. Census Bureau, Census 2000 Special Reports, Series CENSR-4, Demographic Trends in the 20th Century [Electronic Version]. Washington, D.C.: U.S. Government Printing Office. Retrieved March 26, 2007 from <http://www.census.gov/prod/2002pubs/censr-4.pdf>
- Illinois Department of Children and Family Services. (2004). *Child and Family Services Plan Federal Fiscal Years 2005-2009*. State of Illinois.
- Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs. *Federal Register* 70:226, 71194-71198. (25 November 2005). Available: http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?dbname=2005_register&position=all&page=71194
- Iowa Division of Behavioral, Developmental, and Protective Services for Adults, Children and Families. (2006). *Title IV-B Child and Family Service Plan: 2006 Annual Progress and Service Report*. Iowa Department of Human Services.
- James Bell Associates. (2006). *Summary of the Title IV-E Child Welfare Waiver Demonstrations*. Arlington, VA: U.S. Department of Health and Human Services. Retrieved on February 5, 2007 from http://www.acf.hhs.gov/programs/cb/programs_fund/cwwaiver/summary_demo2006.htm

- Kansas Division of Children and Family Services. (2006). *Annual Progress and Services Report, Comprehensive Child and Family Services State Plan 2005-2009*. State of Kansas Department of Social and Rehabilitation Services.
- Long, C., Downs, A.C., Gillette, B., & Kills in Sight, L. (2006). Assessing cultural life skills of American Indian youth [Electronic Version]. *Child Youth Care Forum*, 35(4), 289-304. Retrieved February 2, 2007 from <http://www.springerlink.com/content/pp63t7n474307514/>
- Louisiana Office of Community Services. (2005). *2005 Annual Progress and Services Report*. State of Louisiana Department of Social Services.
- Maine Bureau of Children and Family Services. (2005). *Annual Progress and Services Report*. State of Maine Department of Health and Human Services.
- McMahon, A., and Gullerud, E. N. (1995). Native American agencies for Native American children: Fulfilling the promise of the Indian Child Welfare Act. *Journal of Sociology and Social Welfare*, 22(1), 87-98.
- Michigan Children's Services Administration. (2006). *2005-2009 Consolidated Child and Family Services Plan: 2006 Annual Progress and Services Report (APSR)*. State of Michigan Department of Human Services.
- Minnesota Child and Safety Permanency Division. (2004). *Minnesota Child and Family Services Plan 2005-2009*. State of Minnesota Department of Human Services.
- Missouri Children's Division. (2006). *Child and Family Services Plan – 2007; Annual Progress and Services Report – 2006*. State of Missouri Department of Social Services.
- Montana Child and Family Services Division. (2006). *2006 Annual Progress and Services Review Report*. State of Montana Department of Public Health and Human Services.
- Muscogee (Creek) Nation Children and Family Services Administration. (2005). *CFSA Final Report FY 2005*. Muscogee (Creek) Nation Division of Community Services.
- National Association of Social Workers. (2001). *NASW Standards for Cultural Competence in Social Work Practice* [Electronic Version]. Washington, D.C.: NASW Press. Retrieved March 23, 2007 from <http://www.socialworkers.org/practice/standards/NASWCulturalStandards.pdf>
- National Association of Social Workers. (2006). *Licensed Social Workers in the United States 2004, Chapter 1 of 4, Overview* [Electronic Version]. Rensselaer, NY: School of Public Health, University at Albany. Washington, D.C.: National Association of Social Workers. Retrieved March 23, 2007 from <http://workforce.socialworkers.org/studies/fullStudy0806.pdf>

- National Child Welfare Resource Center for Youth Development. (2003). *Four Core Principles*. Tulsa, OK: University of Oklahoma OUTREACH.
- National Child Welfare Resource Center for Youth Development. (2006). *State by State Fact Pages*. Retrieved January 12, 2007 from http://www.nrcys.ou.edu/yd/state_pages.html
- Nebraska Office of Protection and Safety. (2006). *Nebraska Annual Progress and Services Report July 1, 2005-June 30, 2006*. Nebraska Department of Health and Human Services.
- Nevada Division of Child and Family Services. (2006). *Annual Progress & Services Report; Five-Year Child and Family Services Statewide Plan for SFY 2006*. State of Nevada Department of Human Services.
- New Mexico Children, Youth and Families Department. (2006). *New Mexico FY 2006 Annual Progress and Services Report*. State of New Mexico.
- New Mexico Children, Youth and Families Department. (2004). *New Mexico 2005-2009 Child and Family Services Plan; Attachment I; Appendix D: Demographics to Support Outcome Measures*. State of New Mexico.
- North Carolina Division of Social Services. (2005). *Child and Family Services State Plan; Child Abuse Prevention and Treatment Act State Plan; Chafee Foster Care Independence Program State Plan 2005-2009*. State of North Carolina Department of Health and Human Services.
- North Dakota Children and Family Services Division. (2006). *Child and Family Services Plan: Annual Progress and Services Report: Title IV-B Sub Part I; Title IV-B Sub Part II; CAPTA; Chafee ILP, October 1, 2006 – September 30, 2009*. North Dakota Department of Human Services.
- Northeast Wisconsin Technical College. (2007). *Northeast Wisconsin Technical College 2007-2008 Catalog: Native American Gaming-Casino Management* [Electronic Version]. Retrieved March 30, 2007 from http://www.nwtc.edu/Programs/PDFs/Native_American_Gaming-Casino_Management.pdf
- Ohio Office for Children and Families. (2006). *Ohio Annual Progress and Services Report FY 2006*. State of Ohio Department of Job and Family Services.
- Oklahoma Children and Family Services Division. (2006). *Tribes with Tribal State Agreements*. State of Oklahoma Department of Human Services.
- Oregon Children, Adults and Families Division. (2005). *Annual Progress and Services Report for FFY 2005*. State of Oregon Department of Human Services.
- Oregon Children, Adults and Families Division. (2004). *Child and Family Services Plan Final Report for FFY 2000-2004; Five Year Plan for FFY 2005-2009*. State of Oregon Department of Human Services.

- Pew Commission on Children in Foster Care. (2004, May 18). *Fostering the Future: Safety, Permanence and Well-Being for Children in Foster Care* [Electronic Version]. Retrieved January 22, 2007 from <http://pewfostercare.org/research/docs/FinalReport.pdf>
- Public Welfare, 45 C.F.R. § 1357. (2002). Available at: http://www.gpo.gov/nara/cfr/waisidx_02/45cfr1357_02.html
- Ramasay, R. (1996). Post-high school employment: A follow-up of Apache Native American youth. *Journal of Learning Disabilities*, 29(2), 174–179.
- Sheehy, A.; Oldham, E.; Zanghi, M.; Ansell, D.; Correia III, P.; & Copeland, R. (2002). *Promising Practices: Supporting Transition of Youth Served by the Foster Care System*. Baltimore, MD: Annie E. Casey Foundation. Available: http://www.nrcys.ou.edu/yd/resources/publications/pdfs/promising_practices-1.pdf
- South Dakota Office of Child Protection Services. (2006). *Child and Family Services Plan 2005-2009: 2006 Annual Progress and Services Report*. State of South Dakota Department of Social Services.
- Tennessee Department of Children’s Services. (2006). *Title IV-B Annual Progress and Services Report for the 2005-2006 Fiscal Year*. Office of Research and Public Service, College of Social Work, The University of Tennessee.
- Texas Department of Family and Protective Services. (2006). *The State of Texas: Title IV-B Child and Family Service Plan 2006: Annual Progress and Services Report*. State of Texas.
- U.S. Census Bureau News. (2006, August 4). *Estimates of the Population by Race Alone or in Combination and Hispanic or Latino Origin for the United States and States*. Washington D.C.: U.S. Department of Commerce. Retrieved December 15, 2006 from <http://www.census.gov/Press-Release/www/2006/cb06-123table1.xls>
- U.S. Department of Health and Human Services, Office of Intergovernmental Affairs, Office of Tribal Affairs. (2005, January). *Department Tribal Consultation Policy*. Retrieved March 23, 2007 from <http://www.hhs.gov/ofta/docs/FnlCnsltPlcywl.pdf>
- U.S. General Accounting Office. (1999, November). *Foster Care: Effectiveness of Independent Living Services Unknown*. GAO/HEHS-00-13. Washington, D.C.: U.S. Government Printing Office. Retrieved December 6, 2006 from <http://www.gao.gov/new.items/he00013.pdf>
- U.S. General Accounting Office. (2004, November). *Foster Youth: HHS Actions Could Improve Coordination of Services and Monitoring of States’ Independent Living Programs*. GAO-05-25. Washington, D.C.: U.S. Government Printing Office. Retrieved December 8, 2006 from <http://www.gao.gov/new.items/d0525.pdf>

- U.S. Office of Management and Budget. (2004) *Program Assessment: Independent Living Program*. Retrieved December 5, 2006 from <http://www.whitehouse.gov/omb/expectmore/summary/10002146.2004.html>
- Utah Division of Child and Family Services. (2006). *Annual Progress and Services Report: June 2006*. State of Utah Department of Human Services.
- Washington Children's Administration. (2006). *Washington State Annual Progress and Services Report FY 2006*. State of Washington Department of Social and Health Services.
- Werner, E. (2006, July). Casinos bank another record year of revenues. *Indian Country Today*. Retrieved March 30, 2007 from <http://www.indiancountry.com/content.cfm?id=1096413353>
- Wisconsin Division of Children and Family Services. (2006). *Wisconsin Child and Family Services Plan: Annual Progress and Services Report for FFY 2006*. State of Wisconsin Department of Health and Family Services.
- Wyoming Department of Family Services. (2004). *Wyoming Child and Family Services Plan 2005-2009*. State of Wyoming.

Appendix A: NRCOI Fact Sheet: Approaches to Collaboration...State-Tribal Partnerships

Approaches to Collaboration... State-Tribal Partnerships

Below are some actions agencies can take to comply with federal law and to promote quality services for all children:

- Identify all the Tribes in the State and educate caseworkers, supervisors and managers on the State and local level about the Tribes within the boundaries of the State.
- Maintain a centralized, current list of names, addresses, phone numbers of the Tribes, Tribal leaders, and Tribal child welfare directors and staff.
- In States without federally recognized Tribes, identify and work with Tribal agencies or organizations, particularly in urban areas. Similarly, maintain a current list of Native American organizations in the State.
- Involve Tribal representatives in training child welfare staff to stress the importance of asking each new client about Tribal membership regardless of the child's physical characteristics and whether or not the State has any Tribes.
- Listen to Tribes and work to understand the complexity of funding streams and governmental entities that impact on Tribes (federal, State, county, Tribal).
- Work with and invite each individual Tribe rather than only the Tribal associations. Tribes do not speak for one another.
- Enhance policies and processes to ensure better communication among local child welfare staff and Tribes and to consistently collaborate with Tribes at the local level (by, for example, establishing a regular meeting schedule between child welfare staff and Tribal representatives).
- Strengthen consultation policies for the child welfare agency to require regular consultation with Tribes (on policy and practice issues).
- Have regular meetings between State child welfare directors and Tribal child welfare directors. Hold forums to share data on particular issues and brainstorm barriers and solutions (i.e., recruitment of Tribal foster and adoptive homes).
- Involve Native American organizations in recruitment efforts for Native American families living off the reservation.
- Involve Tribes in Child and Family Services Review (CFSR) process:
 - invite each individual Tribe to be represented on broad-based planning groups, implementation teams and work groups or committees;
 - meet with Tribes to review statewide assessment and final report data and develop strategies to address issues relevant to Tribes;
 - include these strategies in a strategic plan that is incorporated into the PIP.
- Involve Tribal staff and representatives as members of review teams holding district/local CFSR-style reviews.
- Coordinate with Tribes on training issues; help identify training opportunities for Native American foster parents and staff.
- Train non-Native American staff in culturally competent practices.
- Help fund and support Tribal-led conferences.
- Employ Tribal liaison staff in state agency.
- Employ court improvement specialists focused on ASFA/ICWA compliance.
- Collaborate with and support Tribal applications for grants.

NCWRCOI Fact Sheet: Approaches to Collaboration...State-Tribal Partnerships, National Child Welfare Resource Center for Organizational Improvement, 2005