

ADMINISTRATION ON CHILDREN, YOUTH AND FAMILIES

Notes from March 8, 2016 consultation on title IV-E Plan Development Grant FOA

I wanted to also say that those written comments are due April 11th. There was a typo in our “Dear Tribal Leader” letter. So the actual date for comments is April 11th. And, in addition, we’re experiencing some problems with the inbox for the Tribal FOA email address. So we’re asking that if you provide written comments, to please cc: Eileen West. Her e-mail address is also in the Tribal Leader FOA. But I can give it to you again. And I can review this again at the end of the meeting in case you’re rushing to make notes. So our agenda for this meeting is pretty simple. We’re basically just going to review the purpose of the consultation and then going to have a dialogue about Title IV-E development grants. Eileen West is here. She’ll lead our discussion on that. Eileen, what’s your official title?

Program Specialist.

Program Specialist for Direct IV-E. And Carlette Randall is also here. And she has a similar role as a Program Specialist, in a similar role with Title IV-E’s development grants. And then, at the end of the meeting, we’ll review when the funding opportunity announcement should be posted, or when we expect it will be posted. And I’ll just remind you that we’ll have another consultation, phone-based consultation meeting, on the 10th. So that you can either participate in that or let others know that if they weren’t able to join today, they can participate again on the 10th. So, Miss Eileen...

Thank you, Heather. And thank you, all, folks, for being able to participate in today’s consultation. I’ve been, and it’s been my good fortune to be with the folks who’ve had this grant, from the beginning. So I really do look forward to your input in terms of [unintelligible] funding opportunity announcements. As some of you may be aware, this is a 24-month funding opportunity for a one-time grant to tribes, tribal organizations, or tribal consortia that are interested in developing tribal Title IV-E plans to implement a foster care, adoption assistance and a tribal option, guardianship assistance program. So the grant period is 24 months and that’s if the [background noise] budget period. So the budget period and the grant period and the maximum award of \$300,000 are all set in legislation in the Social Security Act. So, funds can be used toward any cost that will help you get to an approvable Title IV-E plan. And some example of things are case planning, case review systems, foster care licensing and standards for tribal care foster homes and child care facilities, quality assurance systems, court structure and procedures, data collection systems, cost allocation methodology development, financial controls, financial manage and processes, and any other costs that can get you toward a Title IV-E plan. So we are anticipating five new awards later on this year. So I will stop talking and ask you some questions. These questions were included on the second page of the Dear Tribal Leader. But what I will do is ask you the question and wait to hear for your thoughts and guidance on these. So the first question is, the standing announcement for tribal Title IV-E plan

development grants is intended to provide funding to assist tribes in developing an approvable Title IV-E plan, so that a tribe may operate a foster care, adoption assistance, and optional guardianship assistance program. What recommendations do tribal leaders have for ensuring successful development of a Title IV-E plan?

So just to repeat, what recommendations do you guys have for ensuring successful development of a Title IV-E plan? And I want to, just so that, kind of based on this --but definitely not limited to these questions—we're just using these questions as a way to guide our discussion, we're interested in any of your insights or expertise related to Title IV-E, development plans that you've heard about or participated with in the past, and we're also interested in any expertise that you're willing to share on tribal child welfare systems in general, or child abuse and neglect, in general. So if you have a direct answer to the question of what you recommend for ensuring successful development grants, I'm happy to hear that. But the floor is open for whatever issues you'd like to raise. You can just speak. Everybody's lines are open.

Hi, this is Angelina Callis, and I'm with Pechanga Child and Family Services. Elizabeth Little Elk, our director, wasn't able to be with us today, but Tammy Red Owl's here, and I'm here, and Lee Ekka, who is a part-time employee, is also here with us.

Welcome.

Thank you. So I know for us, we had a really hard time when we started which was really in full force a year and a half ago or so. But initially, there's no sort of guide. So when the tribe received the plan, and I know the plan is supposed to be the guide, but interpreting all that legislation in our own workgroup has been really difficult. So, even some sort of template timeline, or a list of things we should be thinking about. We spent a lot of time looking at our organizational chart and writing job descriptions. Those were things that came up after we were already halfway through the process. And so, for us, we've talked about that before. It would have been nice to have some sort of something that kind of guided us on things we should be thinking about. What information may we need to gather together. Besides the obvious, hey, you need to have policy and procedure.

So are you thinking, Angelina, are you thinking it would be helpful to have those as you're applying for the development grant? Or would it be helpful once you've been awarded a development grant?

Personally, my opinion, and I don't know if Tammy and Lee agree with this, but my opinion would be that, that would be helpful before applying to the grant. That way, people have a better idea of the amount of work it's going to take.

Yes. That's very helpful for us to hear. And you wouldn't be the first person who's said exactly those sorts of things. So thank you very much, Angelina.

Hi, this is Judy Urcurdum, writing for the Mashpee Wampanoag tribe. You had mentioned that there were going to be five awards this year. Do you have an idea of how many applicants there'll be? So roughly what the rate of award will be?

You know, looking back over the past, we really don't know. It really varies what we get and what the level of interest is. I'm sorry, I just can't do any better than that. I just don't have any sense of how many folks are out there. And sometimes we'll know if somebody's really interested. And they'll go right up to the deadline and they'll go, oops, I don't think I'm going to do it this year.

Right. Is there a range that you've seen, roughly, over the years?

No, not really. I mean, if you think we're looking at huge volumes like 50 or 100 tribes, no. We don't get that kind of volume of applications.

Okay. Thank you.

Hi, this is Angelina again. I was just thinking. Is there any material out there that may be helpful for smaller tribes who have thought about applying for the grant but then maybe decide they might want to do a state tribal agreement instead? And so, maybe the differences between getting a direct grant and starting some conversations with their state, to look at that as an option instead?

You know, I actually think there might be something on the capacity building for tribes web page on that. I think there might be a TA document on there.

Okay, thank you.

I'm sorry, can you... This is Shamika calling from the Seminole tribe of Florida. Can you please repeat that information again?

I think that the capacity building center for tribes developed like a one-pager on tribe state agreements. And it would be on the capacity building center for tribes webpage. If you sent me an e-mail, I'll be glad to provide further information on it.

Sure. What's your e-mail address?

It is my name, Eileen.West@ACF.HHS.GOV.

Thank you.

It's also on the Dear Tribal Leader letter, if you happen to have that.

Okay, thank you.

You're welcome. Any other questions or comments related to what would be helpful as you're thinking about applying for a development grant?

Eileen, this is Rachel Fore from Cherokee nation.

Hi, Rachel, how are you?

Hi. I just wanted to kind of follow up to Angelina's comment earlier. I think that the guide would be an absolute best practice and a help for the tribe. In addition, I know, as we are six months into our plan development grant, I'm just now wrapping my head around the CAM. And just recently, after one of the grand T [?] calls did I reach out to an Annette in our regional office and said, you know, where exactly do I find the parameters for the CAM because that's not included in the plan pre-print. So once she provided those resources to me, that was very eye-opening and a great help. But without her contact, being really consistent, I probably would have floundered a little longer in that area of the Title IV-E plan.

Thank you for that information. And just, rather to maybe thinking about what to do about a CAM, that's actually not part of the grant deliverable for pre-print purposes. You need that cost allocation methodology so that you can claim your administrative cost. So those documents are developed with... You'll be working with folks from the regional office that are the financial experts in terms of developing that.

Hi, this is Angelina again. So we are in the process of completing our CAM right now, right? And we definitely got started on it much later than I think we would recommend other tribes who are new to this process get started. Like, we would have started looking at the CAM at the very beginning when we very first got awarded our grant. Because all those things that we talked about—the org chart, the job descriptions, all this super-detailed budgeting information—ended up taking time out of us working on the pre-print and we ended up spending that time working on the CAM instead. But we've also, our understanding of it, is that the CAM must now be submitted to the financial piece, or the financial department of the regional office before, or at the same time, as the pre-print is submitted.

Let me clarify. The pre-print comes to the Children's Bureau and the Children's Bureau approves that. So that's a program piece. The CAM, the cost allocation methodology, goes through the financial folks in the office of grants management. So those are the folks that a tribe would be working with in terms of developing their CAM. And then the folks in the regional office, once they think everything looks fine, they will forward it on to the folks in the Washington, D.C. office for final approval. So your CAM goes one way and your pre-print goes another way. And they can both get approved at different times. You don't necessarily have to have one approved before the other.

Okay. So now that we've got some clarification on that, I think just to add to the list of things that may be helpful, if we're talking about most exciting, we have this guidebook to help new grantees, would be how does the submission process work, and what's the best way to work with our regional office? And I know it's kind of, each region can be slightly different, sometimes. And so maybe, including that piece in the guide would be really helpful, I think, so that we understand, as a tribe, how do we reach out to our regional office and build this really good relationship. And also, do we need to reach out

separately to this other financial department and work on building a relationship with them as well? Because that kind of stuff, we kind of, you know, it took us a long time to get it figured out, and what we're supposed to be doing, and how that's supposed to work.

I'm hearing you loud and clear, Angelina. We're all furiously writing. We really appreciate it. And for those who haven't really looked at these, I thought I would just define a couple of terms. So when we refer to the pre-print, that's the – Eileen's going to correct me on this—that's the form that you're filling out as you go through the development process that becomes your plan. You're implementation plan. That's what you're filling out for the development process. So when we refer to the pre-print, or the plan, we sort of use those words interchangeably. And, I think we said Children's Bureau, Children's Bureau administers seed grants, including direct Title IV-E. And then Office of Grants Management is the financial arm, actually at ACS not in Children's Bureau. So from our structure, it's two parallel highways. Office of Grants Management, and Children's Bureau are parallel highways that intersect with our grantees. And I agree, that some sort of guidebook seems like a great idea for defining these terms, and for seeing how they work together from the federal perspective, so that we can start with a shared language and a shared understanding of how the structures work together. So I really appreciate that.

I'd like to add on to what Heather shared with you. Because whether you're doing the grant, or whether you're actually starting to work on developing your plan, or if you've gone beyond the plan part and have implemented a Title IV-E program, you're always going to have two players as your partners. One is your program folks in your regional office, and they're always looking at the program side of it. The other side is the Office of Grants Management folks. They're the folks that will be processing your forms that you will submit for reimbursement if you're already operating a program. So you've always got the two pieces marching together, side by side.

Eileen?

Yes.

Hi, this is Leslie with the Mashpee Wampanoag tribe.

Hi, Leslie.

Hi. Going back to the first question around some guidance. We've been exercising Title 4B as in boy for a number of years. And I've been really looking closely at documents that talk a lot about Title 4B versus Title IV-E plan. One being a five year narrative of goals and objectives in promoting sub-parts one and two under Title 4B. And the other, that we're looking to apply for in developing a plan --for funding to develop that plan—is that pre-print that you just spoke about. So, with that said, increasing technical assistance, in terms of guidance, on how to meet all the criterion in the FOA and the

request for proposals, would be of great assistance. We've been reaching out to other tribes to see –who exercise Title IV-E plans—to see if they can help guide us in certain areas. Probably for me, being one of the grant writers, in more of the approach, in what works for them, and what we might gain from them in our quest. We're also experiencing, under recent land... it's a trust, taking tribal jurisdiction over child welfare cases. So, in fact, are creating, during that process, children's codes in our own tribal court. With all of this said, and while exercising Title 4B activities, we would look to ask you guys for more support in just meeting the overall requirements. And is that possible even for this next application, which is due at the end of April?

So I think what's... there's a couple of things going on. One is for IV-E purposes, there is over 100 pages of requirements on that document that we referred to as the pre-print. So as part of your process, you go... after each one of those requirements, you tell us where you have it in your policy, or law, or codes, wherever you choose to put it. So that takes a humungous amount of work, just filling out that pre-print is a lot of work. So when I've been working with tribes, one of the things I recommend, because, you know as soon as you start getting into this stuff, your mind, especially the social workers at heart, the first thing they're starting to think about is, well, what's our program going to look like? It's very difficult to have enough resources to develop that plan and all the policies that go with it as well as start to improve your program. So I've been encouraging folks to start making a list of things that they would like to improve once they get their plan, and then move forward on those. If you are fortunate enough to have a lot of resources, you may be able to do both at the same time.

Leslie, this is Heather. I heard you on a couple of pieces as well. I heard you on increasing TNTA to meet both the 4B and the IV-E requirement. And some possibilities for a peer to peer development?

For development grantees and potential applicants. Was I hearing you right? Was there anything I needed to add?

Basically, yes. We do get a lot of Title 4B support from our local ETF office, Children's Bureau office. But yes, you basically got it right. And there's this document that's been created in April of 2009 called a Technical Assistance Document Consideration for Indian tribes who are seeking to operate a Title IV-E program. And I've found this very helpful. But it's along the lines that, yes, you heard what other support can we get in meeting the criterions. Because we have a lot of things going on at the same time right now to apply for this grant. So yes, to answer your question, yes, you are correct.

Thank you. Moving on to the second question. What recommendations do you have for gauging the capacity of a tribe's child welfare agency and administrative infrastructure and assessing a tribe's readiness to operate a Title IV-E program?

[unintelligible]

For those who are thinking about applying or for those who have already applied for development grants, did you already engage in some sort of assessment? Or did you do that in the beginning of your plan? Or had you not considered it?

Hi, this is Angelina again. So we, I know Pechanga Child and Family Services did an organizational assessment with one of the implementation centers about four years ago or so. As far as I know, that's the only type of assessment that they conducted to decide, in terms of readiness. But that was for a different project, not necessarily for Title IV-E. I think the resources out there... well, first of all, I think it's hard to internally conduct an assessment to determine if your agency is ready for that because you're in it. And so, for us, as social workers, working inside the agency, if we think this is what's best for our kids, why would we say no? And so, for us to do an internal assessment to determine readiness may not be the best way to decide how realistic that is. But I also know that there isn't necessarily resources out there who could potentially provide that assessment for us. You know, there's the NRC... not the NRC. The Collaboration Center for Tribes, sorry. And I've seen them present, and it's really great, except that their assessment process can take three to four months. And then they could still turn around and say yeah, no, we don't think that you're ready, which also means that we're not going to help you with any of the other stuff either because you have too much going on. So for us, that's kind of been hard. It's been hard to try and find resources who are willing and able at the same time to help us get all of our pieces together for the plan. And also all the supporting stuff. So we're definitely feeling the pain, and the pain on that side. It's been hard.

I can answer here for a moment. My name is Kimberly Furman, from the Wintu Tribe of Northern California. And we're not quite federal yet, but in the process. Our caseload is determining our need for grants. And we have partnered with our [unintelligible], and our judges, and our tribal data resources to use our progeny systems, our software systems, to determine the need for our children. And we have implemented e-mail, like an iqua@wintutribes.org and are starting to do data tracking of our children in the courts and how often they are adopted out. And we just feel that there's a need, a desperate need, even from the get-go, when we first become finally federal. So we're looking at these grants now, and doing some data resourcing now. So that's why I'm observing today.

So that's the needs side of the assessment. And that's a really smart way to start thinking about the scope of need. Was that Kelly? Is that what you said? Kimberly from Wintu.

And we've implemented the iqua@ and we're hoping that every tribe does so we can have a no-cost data analysis of how many kids are actually being processed a year. And as social workers change, this is also helpful for consistency. And then our tribal data resources are guiding whether we need to apply for these grants, and clearly we do.

Can I jump in again? It's Leslie from the Mashpee Wampanoag Tribe.

Hi, Leslie. Go ahead.

Going back a little bit on the assessment, the internal assessment. I believe one of our iqua department, Sarah Sprewell, is on the phone. And she has been working on a tribal organizational assessment for our child welfare program, our iqua child welfare program. And that's through the capacity building center for tribes. And they really look at the program structure, the operations, the workforce, the talent pool, roles and responsibilities, community partners and providers, and the needs of the communities, and the families and the children. And with that, also looking at data and technology systems, and methods to use to collect program data. Which is why we would be applying for funding. So that we can develop the processes for... or up the abilities to do these in a much more professional and timely fashion. In terms of creating a plan, a cohesive, comprehensive, Title IV-E plan. So I wanted to throw that out there, and I don't know if Sarah has muted her phone or not, but she's been working closely with the capacity building center for tribes on this TOA, the Tribal Organizational Assessment. But I think it's Angelina who said, it's been really heavy in terms of all of the different moving parts that have to come together. And that's what we're looking at right now, too. And meeting all the criterion of the Title IV-E application for funding is sort of focusing all of that. And for us, it's do-able. And it's a tall order. And it can be done. But I think through this TOA it will happen. And I think that's that assessment piece. So I just wanted to throw that out there for folks if they are struggling with just assessing their internal situation and where different moving parts of the program need to go to be ready to exercise Title IV-E.

Hi, Leslie. This is Sarah Sprewell to all on the phone. And Leslie's correct about CBECAUSE for T. And also, we used in our CDR, National Resource Center for Diligent Recruitment, and both the assessment processes were going through, or offering us technical assistance in developing our strengths and giving us the capacity to move forward, so we can run a program successfully. And I now from other tribes they've worked with, they know what may work, what may not work. So they're very, very helpful in guiding us moving forward. And if you receive Title 4B funds, there's no cost to the tribe for them to come in and do the assessments.

This is Joanna with the Popliaki [?] Tribe.

Hi, Joanna.

Hi. I just wanted to follow up with some of the stuff that they're saying about, you know, I think it is important, it is feasible to do an assessment of your system. But to look at not just what is with your social services system, but for us it's been the partnership with our behavioral health, our courts, our prosecutors, IT, enrollment department. So it's not just looking at your social services department but all the other departments that you're partnering with, or potentially partnering with, when you're doing your IV-E implementation. Or capacity to do the development plan.

That's a helpful addition, Joanna, I appreciate it. Because I think you're right. Because I was hearing, the previous comments were focused on social services

as well. Whether or not they were, that's what I was hearing. So it's good to point out that you should be assessing the linkages and partnerships with supporting agencies as well.

Especially your courts because they are a key player in all of this.

Okay, should we move on to the next question? What recommendations do you have for successful implementation of a tribal Title IV-E plan?

I think it's important to measure –this is Leslie—I think pre-, during, and post. And I say that around any programs that are currently in process. So it probably falls under solid assessments that we were just talking about. And being able to operate a successful Title IV-E plan, you have to be able to measure what's working, what's not working. And I think the guidance on what's on a Title IV-E plan can be found in many different areas, from, under DHHS, ATF, ATB. But to successfully do that, would mean that you need to be able to measure where processes are at. Whether it's internal, that you were just talking about, in relationships, and programs, and processes between enrollment and the program and parts of the program. And if anything isn't working, making modifications to improve upon it. That's one thing. Because, I think, if you can prove that you can successfully operate a Title IV-E plan then you'll be funded. So I think measuring and making modifications where necessary is going to be the real success factor.

Hi, this is Angelina. So what we actually ended up doing, we're completing our plan, but we also have some separate pieces of work that are also happening at the same time. So we built a separate implementation plan. Which I know may not be ideal for everybody. And, like we were just talking about all these things that need to come together and kind of flow into one but kind of start out separately, can cause what I call project fatigue, right?

That's a good term.

But, what we try to do as a team, is look at... set priorities. So one of the priorities when we got together four or five months ago was, let's build a real implementation plan. Something that is separate from the pre-print that is for and specific to our agency. And so what are the things that we need to do in that implementation plan in order to actually administer this Title IV-E? So even though that's not a requirement of the pre-print itself of getting an approved plan, that's what we've found has been helpful as far as getting... it even took some work off of our plate. We were stressing out about things like training and all this stuff that we don't need to think about until we have an actual approved plan. At which point, when our plan is approved, then we can start working our implementation plan and moving forward with those things.

It sounds like it had two kinds of roles. One is a parking lot for things that you were concerned about for your overall implementation. And the second is, feeding the pre-print to your vision for your services. And I think that sounds like a really solid way to go. Are there any questions from any people who don't have

development grants? Or any concerns after hearing all of this that you want to raise before we go to the next question?

Are they only available to the federally recognized tribes?

That is correct. They are indeed, Miss Kimberly.

I have one question. Is the income of the foster parents a factor in whether or not we'll meet the criteria for the Title IV-E?

No. When you're talking about financial criteria, one of the [unintelligible] in IV-E is looking at the home where the child comes from. So they look at the income and resources in the child's home at the time the child was removed. That's the only point. Foster parents' income and resources are not considered at all in any of this.

Okay, so it's typically biological parents who, in which the child were removed from. Their income or poverty level.

Or if the child was adopted, their adoptive parent. Yes. Typically the biological or adoptive parent.

Okay, perfect. Thank you.

This is Joanna again. I do have one thing to add to a recommendation for successful implementation of a plan. For us, a lot of it has been our connections and working with other tribes who have already implemented IV-E or are working on their plan. So we're looking at their policies and procedures, and codes that they have. We've looked at their IT systems that they have in place. So that has been helpful for us when we're looking at implementation.

A good suggestion, thank you.

Hi, this is Angelina again. Before we move on, because we were just working on the pre-print today and talking about this. There's a... we've been provided some copies of completed and approved plans. And so sometimes we look back at those for, kind of, guidance on how we should be citing something in our pre-print. But one of the hard parts is, I think the copies we have are from four or five years ago. Like, they were some of the very first approved plans. So I don't know if tribes are required to share their completed and approved plans, or if they're not, or if there's a way that maybe you guys at the Children's Bureau could help facilitate, like we were talking about earlier, that peer to peer sharing. So that we can see other people's approved plans. Especially with this new sex trafficking stuff that just got added in. We're kind of in the dark about how we're going to show that we're in compliance with that stuff in policy and code and all those things. And so, some conversations around that to see how maybe what other people are doing. Or what tools they found, or training that they could possibly provide, would be helpful, I think.

So first question about sharing the plans, [unintelligible] public documents. They tend to be really huge documents. So it's sometimes very difficult to try and share them via e-mail, just because of the size of them. I know what tribes tend to do is when they get together, they come with flash drives and that's how they tend to share the documents. That's one way of getting around those challenges of e-mail systems. The question about sex trafficking is a very timely topic. Tribes and states are all looking at this, trying to figure out what to do in terms of meeting that requirement. So yeah, some folks are struggling with what do they need to do in terms of... This is a really good topic for the tribes to all get together and discuss.

So, Eileen, are you thinking that'll be a call topic?

Sex trafficking is a topic we can put on one of our current grantee calls. We will look at getting it, not on this upcoming call, but the one after this, so that we'll be prepared to address this fully and to have a richer conversation about it.

Thank you, I didn't mean to get us off topic on that. But back to the whole successful implementation, I think one of the things that we didn't necessarily think about as we were working this initial piece of the grant and the plan itself, was that the plan changes, right? The sex trafficking stuff just came out and that was June of last year. So we got a new version. So even after we're approved, we have to, in our policy, or in our implementation plan itself, we have to account for the fact that we may be getting updates to the pre-print and then we're going to have to bring the workgroup back together and make those updates, or have a special person who's assigned of being in charge of this, right? So that kind of stuff that we hadn't necessarily thought about in the beginning but now that we know about it, I think it's setting up for that sustainability piece, now that we know it's something we need to do.

So for folks that aren't familiar with this, if you have a 4B plan, you know that every single year, you have to write up some narrative and submit that into the regional office if you want to continue to receive 4B funds. IV-E is different. That's where you tell us where you'd make all that huge long list of requirements, and that plan stays in place until either congress makes a change to the requirement, which is what happened with the sex trafficking piece, or as you're looking at your program and you realize that you need to make some changes. So those are really the two key points in time when things change. And sometimes we get a lot of changes coming out of congress and so we will send you notices when those happen. And the last few years they're been a fair amount of changes. So that's how that does work. So you will need to be prepared to address them as they occur.

Now what do I do thinking long-term about sustaining at least key personnel in the work group? Or key positions in the work group, even if personnel change? I think it's a good idea.

Hi, this is Sarah.

Hi, Sarah.

Hi. Are there any tribal leaders on the phone that have been working, newly working, with Title IV-E, and if so, what have been your biggest challenges in moving forward with implementation of the program?

I don't know that there's anybody on the call now who's implementing the actual IV-E program. There are at least a couple of grantees who are implementing the development grant. But I didn't hear anybody that's actually implementing IV-E. But I think your question is a really good one. And I'm wondering how that information would be helpful to you? Are you trying to pre-plan for bumps in the road? Or some other reason?

Pretty much to have our... to know what may come up, what may not come up. Because we're going for the development grant. But it's always helpful to... and I do have some research that I got on what worked for some tribes. And I think it was a couple years ago, they looked at seven or eight tribes, some were successful and some weren't. And it had why the ones weren't successful. And the ones that generally weren't successful, they hadn't had a really good assessment, or didn't seek out technical assistance. So, we've done that before we even submit for the development grant, in the hopes that we're one step ahead. And in talking to tribal leaders, it would be helpful for me to have information on what their biggest challenges or struggles were when they started the implementation. Kind of that aha! Moment.

Yes. I think –it's Leslie again—to support Sarah's thought on recommendations, on challenges that leaders have found in implementing or developing the plan, in implementing, I think any revisions to a pre-print would probably be helpful. Because that would dictate whether or not something wasn't working, or something had to be updated or changed. Again, probably some kind of measurement tool in assessing whether or not they were successful in meeting objectives of a program, I think would help understanding plan revisions. And that's where we would probably find those changes or challenges.

We're all writing furiously. So in case you're wondering why it's so quiet. So, yes, some sort of... I think I'm still thinking in terms of the guide that was originally suggested. But some sort of forethought about revisions that could indicate what to think about on the front end, but also could indicate how to adjust the program over time.

Yes. I think a revised pre-print points to those possible modifications or challenges or what have you that Sarah's pointing to that would be nice to hear about or see examples of.

Sounds good. Any other questions, since you've got people on the phone, any other questions that you'd like to ask of participants?

Angelina, hi, this is Sarah again. Angelina, you're actually working Title IV-E or you're still in the development phase?

We are in the development phase working on the pre-print. We are on our way to submitting our last draft section and then what we'll be doing is building that big, giant binder, or the flash drive, like Eileen said.

Okay. And you guys... you said you had assessments four or five years ago. Am I correct?

Yes.

So you had none once you got the grant. You didn't have one redone or request more assistance to have it once you obtained the development grant?

Right. So we had the assessment... was it four years ago, or five? Okay. So about four years ago was the assessment through the implementation center, MP Quick. And we started applying for the direct IV-E grant three years ago. No, no, I'm sorry. We applied three times, I'm sorry. Through that assessment process, every year, we were applying. We applied three times. And then the fourth time we were successful. Third, sorry. The third time, we were granted it. And so we started work. We're in our extension year right now. But we did not re-do an assessment prior to getting an award or at the time of the award.

You think that might have been helpful for you all?

I think here, there was a decision made by the tribe and the executive director that direct Title IV-E was most important. Whether the assessment came back that we should or should not do it, I think it's just about the sovereignty of the tribe and the kids here. So I think the director and the tribe made a decision that they were going to go for the grant and Title IV-E whether or not the assessment came back as a yes or no.

And I think that was a great decision by your tribal leadership. Because more of us need to be looking out for the children. And we are sovereign. And we should treat them with respect and do everything we can to bring them home in our care and custody. So thank you for your hard work.

Thank you, we're excited to be on the phone and talking to everybody today.

Angelina, did you say you made three application submittals before you got funded?

Yes, so we got funded on the third.

So you learned a lot during the submittals, I'm sure.

Yes. It's probably like any other grant process. You get your notes and then you try and make it better. And then... I know we also were not... when did we get 4B status? I

can't remember. This is where having Elizabeth here would be super helpful. Hold on one second, we have a timeline. I'm not sure. Getting the feedback and then changing it slightly, and then re-applying.

And part of our unique circumstance is that the first two times that we applied, we were applying [audio break] Pechanga Child and Family Services, and we didn't apply... the third time we applied, we applied through, specifically the tribe, Rosebud Sioux Tribe. And... to make a very big difference. We're a chartered agency of the tribe. And that seemed to cause a little bit of a ripple in consideration and understanding of our circumstance. But chartered agencies, as we've been told, are...

So Angelina, this is Eileen. Let me just clarify. Chartered agency is viewed as a tribal organization. And they are ineligible entity to apply for the grant.

Ineligible? Or eligible?

Thank you, Eileen. Yes. I was never sure on the wording on that one exactly.

Yes, that's the official government term. And I think if my friends at the Administration for Native Americans were here right now, they would want me to remind you, or they would remind you themselves, that they have a social and economic development grant that they do. And that any of the pre-planning for development can be funded by that grant. The grant hasn't yet been posted, but if you go to the HHS forecast page, you can get a basic summary of the SCD grant. Or you can just Google ANA, Administration for Native Americans, and Social and Economic Development grants. They have specifically said that this would be an excellent use of that grant. So if you're thinking of pre-planning for a development grant and want funding for that, that would be a good opportunity. It's still a big applying for a federal grant process, but they have training, technical assistance for using grants.gov, they have technical assistance for applying for federal grants in general. So they're a very good resource.

Adding on to what Heather said, I know some other tribes have gotten ANA grants and they've used them to develop things like foster care standards, and to do work around their codes. So they're pretty broad in terms of what they might possibly fund.

This is Angelina. So I think, thank you so much for sharing that, because I already pulled it up on my laptop and we'll be looking at it.

Yeah!

Yeah! But I think, definitely, things like that, that we don't necessarily know about. Or the tribal leader may get an e-mail but it's considered spam, right? Because they get five million e-mails a day. So that kind of stuff slips through our fingers sometimes, or falls through the cracks. So a list of resources is always helpful. If anybody has anything like that, we would love it. I'm sure new grantees would love it also.

So this is probably an opportunity to remind folks, or if you're not familiar with us, the Children's Bureau has a tribal list serve, which is dedicated to putting information out there for tribes. If you are not on it, if you'd send me an e-mail, I'd be more than glad to add you to it.

So the Dear Tribal Leader letters are sent directly to tribal leaders, our mailing list for tribal leaders. But we also include our Dear Tribal Leader letters on the tribal list serve, the Children's Bureau's tribal list serve. So that's a way of making sure the information gets out of the tribal leader's inbox.

Thank you.

My pleasure.

So I'm thinking we can move on to the fourth question. And what is it you feel is important for the Children's Bureau to consider with respect to this grant announcement for developing a Title IV-E plan? And I'll also add, anything else out there that you feel you would like to share with us or you feel we need to know?

Are there any concerns you have, or questions you have that haven't been addressed or raised? This is a great time. This is, kind of, open forum time. Even more so.

The is Sarah Sprewell again. We have a tribe that's a state over that we've been trying to work with. And they're actually in their last year of their development grant. And we've tried to work together, and they seem extremely busy. They have less staff than we do and we can kind of see why they're so busy. But in the process, just for me, I had requested a copy of their grant application that was successfully submitted. Not that I want to copy it, but I feel that it would have been helpful for me, it still will be helpful for me, to see. Because I know they had applied once before and got denied. And so, if we could have something like that, even when we're considering it. And maybe a generic one, even, what a successful grant application looks like, I think would be helpful to anyone. Even considering moving forward with the development grant and applying for it.

On that note, this is Millie, but I just wanted to answer. On that note, Sarah, Carla actually did send an e-mail with some information connecting us with Eastern Band of Cherokees. She connected us with a contact there. I think I [too many voices]. So maybe we could reach out to them and ask them for that.

I was just wondering if the Children's Bureau could provide a very generic, what would be appropriate according to your tribe, of course, but what would look like a successful application.

This is Eileen. I would direct you, when the funding opportunity announcement comes out, to look at the evaluation criteria. That is what the funding... what the grant proposal is evaluated on. So that is your guide.

Okay. Thanks, Eileen.

In terms of sharing grant applications with other tribes, I know in the past, other tribes have freely shared their grant applications. If you're not getting them, the other way of getting them, and it's going to take longer, is to do a Freedom of Information request to the federal government to get a copy.

Hopefully we won't have to go that route, but thank you. That's good information. I'll share with other tribes when they're considering moving forward. I appreciate that.

But I would, first of all, encourage you to ask the other tribes. That's the quickest way of getting them.

I think the question is a good one for Angelina, regarding any recommendations to the Children's Bureau. Because they've made three grant applications. And I'm wondering what recommendations she has? Or they have regarding this question.

I think, unfortunately, we don't have any great recommendations, either. Because for us, it's kind of the same thing. It's trial and error, and we wish we could have had some sort of tip sheet. I know that's not how it works, because if everyone had a tip sheet, then we'd have to... then you guys would have to give us all your money.

Well, if everybody had access to a tip sheet, I would just think that the applications would be stronger. The issue is whether everybody has access to it. So these are things I'm all writing down and we'll see how far we can push pre-application support. And these are questions I'll be asking after this call. So I appreciate you raising them.

I mean, the Administration for Native Americans does an amazing job – this is Judy with the Wampanoag Tribe—with technical system in advance of putting together their federal grants SEDS, and language preservations, etc. And they offer them throughout the country. And since it's under the same umbrella, under ACS, it would make sense for your guys to have a similar technical assistance, which I think, as someone who's written and ANA grant, was absolutely invaluable in helping us to get funded in the past. Because we had somebody who took us through a two- or three-day session that was just all tip sheets. And what to do and what not to do.

That's exactly the model that we're looking at. So thank you for helping us see that we might be headed in the right direction.

Eileen, do you know the document that I was referring to earlier on considerations for Indian tribes?

Yes, I'm familiar with it?

Do you consider that a really helpful document? I mean, it's long, but for me, it's been helpful in starting to gather the information that's necessary for each section. It asks key question for consideration. So it can help guide the narrative for each of the sections

required in the application, however, a tip sheet, even under that, would be even more helpful because it would help to translate, you know, some of that expectation.

I think that total consideration document is one of the best documents I've seen. And I encourage tribes to look at it before they apply. And even after, when they've gotten a grant, to take a look at that. There are questions in there that are really helpful in terms of having those internal discussions. What do you want to do? How do you want to do it? I think it's a really great document.

We can look at sending that out via the Tribal List serve to [unintelligible] it would be a timely notice around this time.

It is posted on the [unintelligible]'s webpage. If you go to the focus area, and tribe, it's right there.

This is on the Children's Bureau's website?

It's on the webpage, it's got its own block, it says Tribal Considerations TA document.

Okay.

I have a quick question for Angelina regarding the Considerations document. Did you use this when you made your first two submittals that weren't funded?

I don't believe so. Sorry, I'm actually looking it up right now. Because I don't think I've seen it before. But just so you all know, I'm more than willing to pass your questions on to Elizabeth who can then respond to Eileen. I was not here for the first three rounds of grant application. And since she's out today, I would be more than happy to ask her to write some more up about her process and how she went about doing that. And then she can e-mail it to Eileen, if you 'd like me to do that.

Did the funder give you a post-application evaluation and what wasn't complete or comprehensive enough?

Yes, we're not sure.

It's Eileen. We do send out, for every one of those grant applications that aren't successful, we do send to the tribal leader, a list of strength and weakness statements. So if a tribe didn't get a grant, then they know what they might want to consider working on if they reapply.

So this is Angelina, and there was just a couple things, we were on mute and just listening-slash-deciding what our last comments wanted to be. There were a couple of things we wanted to bring up before everybody scatters off and we're done for the day. I think one of the most important things we've found is that in our work group that works on the pre-print itself, we actually have lots of practice discussions. And I know as you're looking at the pre-print and you're just worried about making these citations and

meeting the compliance requirements and things like that, it's not necessarily you think that may come up, but I know I definitely feel that as we're in our work group and we're really, truly understanding and grasping what it means to be compliant with IV-E, and be a IV-E agency, we have lots of practice discussions about what we should be doing, what we're doing now, what we should be doing when we're Title IV-E and how we want that to look. So I think, for us, that's definitely a big, valuable piece of the work that we've been doing. And it does take up some time, but I don't think that we would completely understand what it means to be a tribal IV-E-funded agency if we didn't have those conversations. So that's a piece to consider and think about if you're looking at doing the grant. And then, for us, I don't know if anyone's interested, but a couple of things that have been really super helpful for us is, we use Google docs. We loaded our pre-print into Google documents and Google drive. And so now we can access it online no matter where anybody is. So any sort of electronic sharing application, or even a Dropbox sort of thing, we've found so helpful. It means that we don't have to be e-mailing things back and forth. We can just make changes... I mean, we've loaded our pre-print itself, our policy and procedure...

Tribal code?

Yes, we've loaded tribal code. Our tribal code didn't have a table of contents. So we took the time necessary to build a table of contents so we can easily search for something. We've also included our code change list. Because as you know, our code hasn't been revised for a little while. So for us, there's things that Title IV-E requires that we don't have in there right now. And so we've built this nice big list, and yesterday was actually the first day we shared it with one of the tribal court judges and we're on our path to getting in front of the judiciary committee so they can look at this list of code changes that we're requesting, too. So I don't know if that's helpful to anybody, but...

And right now it's about 10 legal-sized pages.

Yes. That's our list so far of code changes. Or additions to the code. If not changes.

I think that's one of those helpful hint things.

Right. I know. Because I've talked with some other tribes who have done the paper and pen, sitting there with the pre-print. And that totally works, but oh, it is so much easier if you have it in the computer. So much easier. And then, one more thing and then I promise I will mute us and then we'll be done over here with our commentary. I don't know if the Children's Bureau has considered doing some sort of peer to peer conference calls. I think this has been really helpful. I know, definitely, for us. But I would imagine also for some of the tribes who are thinking about doing the grant. Just in terms of... you know, like the sharing, right? How did you actually get the grant? What does your implementation look like? Those kind of things that I know we have questions about to tribes who have already been approved. And it's hard for us, I think, to just cold call someone at a tribe who has an approved plan and be like, hey, you're approved. You want to give us some information? That's a little weird for us without some sort of introduction. So I don't know if that's something you guys would consider. But I think

even just an avenue of introduction like a conference call, where then, okay, I have a name and someone I can actually e-mail over at that tribe is super helpful, I know, for us, at least. I don't know about for everyone else.

So this is Eileen. Let me just put this out there. If somebody's interested in contacting one of the other tribes, just send an e-mail, I'll be more than glad to send you contact information.

Okay, thank you.

Another one for my tip sheet.

I did that for one of the tribes today.

Does anyone else have any final ideas or thoughts that they'd like to share before we wrap up? We've still got some time, so the floor is yours.

This is a technical question about the pre-print. When submitting the application requirements –narrative, abstracts, budget, timeline—this piece is essentially a work in progress. As it becomes, it is the plan, correct?

That is correct.

So in submitting for the development grant, for developing the plan, this would be a preliminary document that has the work in the progress of what the plan would ultimately be. So some of these piece... Am I correct is assuming, you would highlight each regulatory reference and the requirement, and provide the status, as well?

Let me ask you a question. Are you saying... I want to make sure I understand what you're saying. Are you saying that you would be going through the pre-print and identifying as part of your grant application process what you need to do? At that level of detail?

As a work in progress for the application, wouldn't it strengthen the application? [unintelligible] being developed in our tribal court. Some that would meet the regulatory requirements of exercising and implementing a Title IV-E plan. As well as other programs. So as part of, or as an attachment to the grant application, this would only support the submittal.

For the grant application, the funding opportunity announcement tells you what you need to respond to. So you want to look at the evaluation criteria, and those are the things that you want to focus on. Because those are the things that are going to be used to determine how successful your grant application is. Any attachments that you want to include with your grant application, just be aware that there is a page limit.

Right. So the question goes back to, doesn't his support, at this level of development, doesn't preliminary pre-print support the application?

No. That is, as I said, when you look at the criteria, that is what you want to respond to. That's what you're going to get evaluated on. If you do something like send in a beautiful pre-print with all kinds of stuff on it, that's not going to get you any points. Because the criteria is what you have to respond to.

Exactly. So it was a technical question in terms of support documentation.

This is Angelina. So I just want to throw something in there. If your tribal court is currently working on code and you haven't been approved for your grant yet, there's this article that Jack Trope wrote called, "Title IV-E: Helping Tribes Meet the Legal Requirements," which might be a helpful... it may not be all inclusive, but it's definitely something we've used to help guide us in our code changes. So if they're already in the process of working on code, it might be good to use that as a guide. So they can work in those code requirements that you need. So you all aren't having to go back later once you do get your grant.

What was that?

I'm sorry, can you repeat that resource?

Yes, the author is Jack Trope. T-R-O-P-E. And Angelina, can you give the exact title again?

It's "Title IV-E: Helping Tribes Meet the Legal Requirements."

The other thing that would be helpful is, go to the Children's Bureau webpage, and you want to pull up the calendar year 2015. And PI, the pre-print is there. It's an attachment to a program instruction. That's got all the requirements listed in there, so it might be helpful to take a look at that.

For those who are still learning the process, a PI is a program instruction. You can probably Google "Title IV-E program instruction 2015" and come up with it, or you can go to the Children's Bureau's website under, I can't quite remember the navigation. But I think it's under the policy line, it'll say "program instructions and information memoranda." So it Googles faster than navigating. Yes, December 2015.

I can tell you, the program instruction number is 15-07. So go to the Children's Bureau's webpage, when it comes up, look for "Laws and Policies," then click on "Program Instructions," then click on calendar year 2015, then look for PI 15-07 and you've got it. And it's an attachment, if it prints out, it's over 100 pages.

Don't print it.

Just warning you. Make sure you have paper in your printer.

Go ahead.

This is Angelina again, and I just realized, I know I'm bringing up a whole bunch of different, random stuff, but one topic of conversation I don't think we've covered that comes kind of post-plan approval, I guess, but is also part of working the plan and working for implementation, is all of our AF cards require data elements. And so, I know for us, that's a lot of forms review and making sure that we're capturing all of that required data so that when we do implement our plan, we're ready for reporting back to you guys.

[unintelligible] Is the AF cards reporting still delayed or did that [unintelligible]?

So Heather's asking the question about AF cards. AF card is a federal database, it's a mandatory database, it reports on elements on adoption and foster care. Most of it is demographic, like dates, birthdates, when the child came into care, and who the child is living with at the time of removal. That kind of thing. So that database, submitting data into that, kicks in quite a ways down the road. So you'd have to develop your plan, have it approved, implement it, and it could be anywhere between a year and two years after your implementation, where you actually have to do your first data submission. So just in terms of looking what the timeline looks like, just so you know that AF cards in the way down that timeline.

So is that a special, not necessarily waiver, but a special tribal thing? That we won't have to submit our data until a year or two down? Or is that a state thing also?

No, the states are already submitting data. They've been doing it for years. So for tribes, when you actually have to submit is really going to hinge on... because it's by federal fiscal year. So when your plan is approved and when the federal fiscal year starts after that, it will help determine how much time exactly you have between the two. And we do have a staff person whose sole job is AF cards. And she works with tribes individually to make sure that they will be able to meet the AF card data submission. She will go onsite, she'll have calls with you regularly. We do provide TA on that piece of it, too.

Any other questions related to AF cards? If not, I thought I heard a voice begin to speak before Angelina did and I want to be sure that person is able to speak if they want. Okay. So one more call for final thought.

This is Angelina, I just want to say thank you again. Because our team really appreciates having this call and being able to hear from the other tribes and grantees that are on also. Your experiences and what you're going through applying for the grant, or being in the midst of the process like we are. So we really appreciate it.

And thank you for allowing someone who's brand new, brand new to this. I have taken three pages of notes and I have lots of resources. Thank you. *Chalebaskin* [?]

You're welcome. We're glad you were able to be on the call with us. So just as a reminder, if you have additional comments, or comments that you really, really

want to assert in a written form, you can do so by April 11th of this year. The e-mail address for those comments is Eileen.West@afib.hhs.gov. There's also an e-mail address in the Dear Tribal Leader letter that is, let me see, let me grab it...

Here, here...

Tribal FOA, thank you. TribalFOA – all one word. TribalFOA@afib.hhs.gov. And we were experiencing some problems with that comment e-mail address in a previous consultation, so we just want to make sure that if you have written comments that they get seen. So if you have written comments, copy Eileen's address as well, we can make sure that the comments are included. And then I'm looking at the forecast. That's the step that we take at HHS to alert people that funding is coming... funding opportunities are coming down the pike. So if you go to the HHS main webpage, type in forecast, you'll see all of the funding that's coming down. So the forecast for this announcement right now indicates that the funding opportunity announcement for IV-E development grant will be posted around the end of April. The specific date listed this morning was April 29th. Which means that the application due date, if it's posted April 29th, the application due date will be July 28th. And you can find other information, broadly, about the development grant funding announcement on that forecast. I think that wraps us up unless you have a question, yes?

I was just saying, from the Mashpee Wampanoag Tribe, Eileen, thank you so much. And hopefully, we'll be working with you soon. Appreciate all your assistance and advice.

Good luck to folks. And thank you all. Personally, I am most grateful to hear your comments and your suggestions or what would be helpful. So thank you for taking your time to join us today.

And on behalf of the ACYF Commissioner, Raphael Lopez, and myself, I'm also very grateful for your time and your willingness to share ideas and tips for going along. So thank you very much.

I'm sorry, quick question. Is there still another call on Thursday?

There is, indeed, another call, it'll be the same type of forum with the same type of questions on Thursday, 2 o'clock. Same call, no different call in number.

Same call in number.

Oh, same call in number. Same passcode. Just another opportunity for those who weren't able to participate today. And I want to remind you that we will post these on the ACF website. We'll post the audio versions and a written transcript as well. Any other questions? Thank you everybody. Have a great day.

Thank you.

Thank you.

END OF SESSION