

Testimony of Holly Morales to the Commission on Native Children  
Virtual Hearing, September 29, 2020

On behalf of Cook Inlet Tribal Council (CITC), thank you for this opportunity to provide testimony for the Commission on Native Children. Cook Inlet Tribal Council (CITC) is a tribal organization and has been designated its tribal authority through Cook Inlet Region Inc., organized through the Alaska Native Claims Settlement Act and recognized under Section 4(b) of the Indian Self-Determination and Education Assistance Act (PL 93-638, 25 U.S.C. 450b). CITC's governance consists of representatives of both the regional corporation and the tribes of the region. CITC leverages resources between federal formula funding, competitive grant funding, private sector donors (foundations, corporations, individuals), and earned income derived from social enterprise. CITC builds human capacity by partnering with individual Alaska Native people to establish and achieve both educational and employment goals that result in lasting, positive change for our people, their families, and their communities.

Demographics and Expanding Service Population

CITC's programs serve the Cook Inlet Region with an American Indian and Alaska Native (AI/AN) population of more than 50,000, or roughly 40% of the total Native American population in Alaska. In Anchorage alone, the Native population is almost 40,000. Directly and indirectly, CITC's programs have statewide impact.

CITC's primary areas of focus include child and family services, education, early childhood learning, recovery services, and employment and training. Each year, these programs serve almost 19,000 Alaska Native people, who have come to recognize CITC as a community locus for assistance, support, and connection. In order to ensure success for our participants, CITC provides an extensive network of services through four departments: child abuse and neglect prevention programs, culture and STEM supplemental after school and school break programs, Early Head Start child care, and the largest continuum of culturally relevant recovery services in Alaska. Through CITC's employment and training opportunities for our people, we offer cash assistance and workforce development as well as operate a child care program which serves hundreds of families each year. In turn, these families move from depending on cash assistance to enjoying unsubsidized employment. Over the past decade, thousands of our participants were able to move from welfare to work.

Currently, CITC provides services to its participants via five core departments: Alaska's People (AKP), Child and Family Services (CFS), Employment and Training Services Department (ETSD), Recovery Services (RS), and Youth Empowerment Services (YES). The AKP and ETSD departments both connect participants with employment, training, and education opportunities, while ETSD also provides participants with temporary funding (e.g., Tribal TANF, general assistance) and other supportive services. The CFS department delivers trauma-informed services that stabilize, preserve, and reunify participating families. The RS department operates a variety of programs and facilities that provide adult and youth participants with outpatient and residential substance use disorder (SUD) treatment services. The YES department delivers in-school and after-school educational programs designed to enrich youth participants' academics, cultural values, traditional knowledge, family involvement, and positive development. Additionally, two CITC's affiliates contribute significantly to CITC's mission with services including Early Head Start/child care (Clare Swan Early Learning Center) and legal advocacy and case management for victims of sexual assault, domestic violence, and human trafficking (Alaska Native Justice Center). As is evident from the

above, CITC's whole person/whole family approach has its foundation and success in the multi-generational nature of our Native communities.

Key components of CITC's consolidated multi-generation approach:

- Common Intake – participants meet with Intake to identify immediate needs and services available for the whole family
- Tribal Temporary Assistance to Needy Families (TANF)
  - Job Coaches, Intensive Case Managers, Youth Case Managers
  - Services the entire family, places emphasis on success of both parents and children
- Early Head Start/ Child Care Partnership
  - Train Tribal TANF Parents to earn CDAs to work in Child Care Center
- Journey Ahead- demonstration grant to integrate community into youth programs.
- Community Partnerships- CITC has begun an effort to create opportunities by developing Collective Impact models in both education and Workforce Development. In order to create opportunities for our participants, we have to be part of a larger movement and participate in statewide conversations.
- Tribal Partnerships- It is important that tribes take the initiative to create partnerships in both Indian country and non-native arenas. There are many urban and rural tribes that could benefit from partnering with community organization and states. Service providers may not know much about Tribal Organizations/Nations, but we would encourage non-tribal organizations to reach out to tribal organizations to partner in their community. Tribes are open to collaboration to ensure that they are creating the best opportunities for their members.

TODAY, all our programs are oriented around the four major areas in which we want to affect population level impact:

1. **Increased self-esteem and cultural identity.** We want to ensure that CITC's programs and advocacy help bring about a community in which strong self-esteem and pride in Alaska Native identity and heritage is widespread.
2. **Increased self-sufficiency** with a reduced reliance on entitlements from the government. We want to create a community in which individuals take responsibility for both themselves and each other.
3. **Increased health and stable families.** We want to build a community of families that help and strengthen each other.
4. **Increased equity and social justice.** Knowing that some of the challenges that the Alaska Native community face are rooted in attitudes and systems that perpetuate racism and prejudice, we want to ensure that CITC's programs and advocacy actively challenge and reform attitudes and systems that hold Alaska Native people back.

Our participant families and children, in many respects, do not enjoy adequate protections against a variety of chronic and systemic issues. Alaska's unemployment rate is more than twice the national average. Sexual assault victimization rates in Alaska are ten times higher for Alaska Native/American Indian (AN/AI) women (in Anchorage specifically), and six times higher for children than the national average. The state's Office of Children's Services (OCS) received 23,603 reports of maltreatment (47.1% of which were screened) in 2019 alone, a rate of 11 per 1,000, in

the top five states nationally. Over 55.3% of parents in Alaska do not have access to regular or routine childcare, overwhelmingly due to cost (73.8%) and/or community shortages (40.3%).

CITC is committed to providing safeguards and opportunities for the state's most vulnerable population so that statistics like these can be reduced. In fully implementing Five Factors, CITC will be able to reliably identify gaps in the delivery of its services, and will gain a window to a unified picture of participants' needs and priorities. With datasets and high-resolution spatial models (e.g., heat maps) that will be created from FF-related qualitative and quantitative data, CITC will be better able to determine families' and communities' needs. As a result, and true to its mission, CITC will be able more securely focus its efforts on addressing participant-determined needs from a multi-generational perspective.

CITC is not a research organization. We are, in fact, acutely aware of the long and unfortunate history of researchers misusing their powers to "study" Native people without their permission and with little effort to report back any information gained to help the people studied. CITC is, however, deeply data-driven and committed to program design based on expert evaluation—meaning that we rely heavily on the expertise of our participants to shape, refine, and re-shape initiatives, in addition to academic and technical assistance. We are grounded in data, but we have come to understand that nationally-recognized "evidence based practices" are not necessarily based on the evidence we see in our data: our practice informs our evidence. (This dilemma of applying western, mainstream models of evidence is illustrated in the recent Family First Prevention Services Act of 2020. While this legislation provides flexibility to allocate IVE funding to prevention services, there is no flexibility to implement models of prevention supported by demonstrated practice-based evidence.) We are committed to honor and use the expertise of our participants, not only in program planning, but also in respecting their own definition of success, based on their values. The Five Factors tool specifically requires participants to identify, in each of the five domains, success metrics of their own choosing.

"Five Factors" is a participant self-assessment and case-management tool that defines, tracks and measures participants' movement toward their own definition of success, and helps CITC determine the most effective way to unite the efforts of its service departments to meet the needs of our participants' families. The eponymous five factors that are used in the Five Factors self-assessment tool are: (1) financial stability, (2) education and training, (3) cultural and spiritual wellness, (4) healthy lifestyles, and (5) relationships. CITC is developing the tool, using extensive participant input, literature reviews, board discussions, and feedback from various partners including the Aspen Institute (via the 2Gen approach). Five Factors is entirely dependent on the voices and perspectives of CITC's participants, particularly those who are parents, for information about our service population.

We understand that our participants live in families of many sorts—what we learned from Aspen about 2-Gen models paved the way for our own "multi-gen" approach—and complex communities. It is notable that when investigation first began to answer "what moves a family forward," the literature reviews exclusively centered around "self sufficiency." In time, and in the ongoing iterative process of discovery, it became clear that, while self-sufficiency is indeed an important value among our participants, values of independence are generally trumped by interdependence. Our people prize community over wealth and find success in the intersection of the five domains of their choosing. As our board of directors pointed out in a recent resolution, "participants cannot succeed in any one domain without working in all."

The Five Factors project rests firmly in a long line of CITC's efforts to better understand its participants' strengths and needs. For instance, over a decade ago, we began using the Results

Based Accountability (RBA) model to understand the impact of our services not just on participants who come in our door, but also on the families and communities in which they live. Increasing interest in the interactive effects of participants and community led to a years-long, highly successful Community Impact project called ARISE (Anchorage Realizing Indigenous Student Excellence), begun as a partnership with United Way of Anchorage and the Anchorage School District. This project was deeply data-driven and active, producing profound change in the way Alaska Native students were counted, the way children entering kindergarten were tested, and in the ability of Alaska Native parents to influence school district policy.

Another example of CITC's ongoing commitment to data-driven practice is a SAMHSA-funded "Strategic Prevention Framework" project called Second Order Change, designed to provide teachers, principals, and other adults in our schools with training to better support their students, and which was instrumental in moving social/emotional learning into the fabric of Anchorage schools and beyond to national networks. This effort forged the recognition that psycho-social support and success lead to success in other areas such as academics, work, and resistance to substance abuse, and led CITC to the path of the Five Factors.

On a broader scale, CITC's involvement in the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program has shown us the benefit of joining networks in a nation-wide collaborative quality improvement project, sharing practice knowledge that allows members to scale up and produce positive outcomes for at-risk families.

Across the country, tribal nations – along with Native organizations and tribal colleges and universities – are crafting innovative solutions to their particular workforce development challenges, solutions that

- (1) make real differences in the lives of Native people in search of employment and the education, skills, and experience necessary to build successful careers, and
- (2) strengthen tribal sovereignty in the process. Along the way, they are discarding or modifying one-size-fits-all programs and approaches that may work for governments elsewhere and that offer the bureaucratic path of least resistance for the federal government

One of the greatest tools available to Tribes and Tribal organizations is their ability to consolidate funding from multiple federal departments and agencies into one plan, one budget and one report, through the Indian Employment and Training and Related Services Consolidation Act, 2017. Over several decades, CITC and its Tribal partners across the country have refined their ability to provide holistic, one person/one family approaches to workforce development and supportive services that have had tremendous impact in Native communities. In 2017, CITC and the national Tribal Workgroup, in conjunction with the National Congress of American Indians, successfully changed policy to add eight additional federal departments to the programs eligible for inclusion in their consolidated plans, directly shaping federal policies to reduce barriers, expand data-sharing systems, and improve employment options for all Tribal organizations and governments.

Public Law 102-477 (hereafter "477") – originally enacted in October 1992 – has served as a critical springboard for tribal innovation in the workforce development arena. The act enables tribal nations and Native organizations, at their own discretion, to consolidate up to 13 different workforce development and related programs across the Departments of the Interior, Labor, Education, and Health and Human Services into a single plan, approved by the Secretary of the Interior, to create customized, comprehensive approaches capable of addressing their particular

workforce development challenges and priorities. To date, more than 250 tribal nations and Native organizations have merged multiple programs into a single 477 plan.

The evidence clearly shows that 477 is working. It has allowed participating tribal nations and Native organizations to streamline service delivery, eliminate programmatic redundancies, and reduce administrative costs, thereby enabling them to more efficiently provide a greater level and quality of direct services to the populations they serve. Most importantly, it has reduced regulatory burden that impedes individual success.

#### 477 as a model for consolidating programs related to Native children:

The 477 program provides an example of increased accountability through the cooperative actions of federal agencies. The law empowers Tribes and Tribal organizations the ability to increase efficiency, decrease administrative burden, increase self-determination and ensure superior results than their counterparts at the state and county level, all while maintaining program guidelines. The 477 program is a model program in Tribal communities across the nation, especially in the current climate of needing to do more with less. It provides increased accountability and integration of services, with the maximum employment and training assistance reaching Tribal participants.

Over the last almost 30 years, this flexibility has successfully facilitated the creation of culturally appropriate programs, freed program funding for direct client services by eliminating duplicative administration and added no cost to the federal government. Cook Inlet Tribal Council (“CITC”) attributes this funding tool as a key component to the outstanding results achieved in moving people from welfare to work, preventing TANF utilization and reducing caseloads.

- Funding for 477 plans is transferred to participating tribes and tribal organizations through contracts and compacts under the provisions of the Indian Self-Determination and Educational Assistance Act (ISDEAA, PL 93-638). This transfer mechanism is an essential element of the success of the 477 program, and has provided the recipients with maximum flexibility to achieve maximum efficiency, through leveraging match dollars.
- These efficiencies have allowed more clients to be served per program dollar, and permitted innovative new program initiatives that better serve clients.
- 477 provides a model for what the Administration has been promoting in terms of inter- and intra-agency cooperation, elimination of duplication, and enhanced service delivery, as well as tribal self-determination.
- Supervision of tribal TANF, CCDF and NEW programs through the 477 program has resulted in increased accountability and success of those programs; tribal TANF programs under 477 have not had the same accountability issues as non-477 tribal TANF tribes, and the 477 program received the highest OMB PART rating in Indian Affairs.

#### Recommendations:

Based on CITC’s experience and ongoing innovative efforts, we recommend the following:

1. Create mechanisms for Tribes and Tribal Organizations to consolidate funding across departments and agencies to better serve Alaska Native and American Indian children, youth and families to eliminate duplication and enhance service delivery.
2. Focus definitions of family at the local level to better align multi-generational approaches to services and programs.

3. Apply “practice-informed evidence” rather than evidence-based practice to better incorporate Alaska Native and American Indian values and success into program design and delivery.

Thank you for the opportunity to provide these written comments on behalf of the Native children and youth we serve.