



White Earth Reservation Tribal Council

**GIIZAAWAASO
INDIAN CHILD WELFARE
P.O. Box 358
White Earth, MN 56591
(218) 983-4647 • Fax (218) 983-3712**

Program Improvement Plan (PIP)

Submitted to the Minnesota
Department of Human Services by
Jeri Jasken, Director

Agency:

White Earth Band of Ojibwe

Giizaawaaso

“Protector of the Young”

Indian Child Welfare Program

Primary Person Responsible for the PIP:

Jeri Jasken, Director

jerij@whiteearth.com

DHS Quality Assurance Contact:

Lori Munsterman

Address:

PO Box 358

White Earth, MN 56591

Telephone Number:

(218) 983-4647

Fax Number:

(218) 983-3712



Step 1
Self-Assessment
“Preview Meeting”

With Lori Munsterman
and Steve Johnson

Step 2
Self-Assessment

By Jeri Jasken, Director,
In collaboration with
Tribal service partners

Step 3

Onsite Review with Lori
Munsterman and Steve
Johnson

Included:

- Caseworker interviews
- File Reviews
- SSIS Reviews
- Stakeholder Interviews
- Exit Conference
- Follow Up Meeting to
discuss PIP

Step 4

Program Improvement
Plan

Draft submitted by Jeri
Jasken, Director

Review conducted by
DHS with comments

Implementation
Timeframe



→Safety

Risk Factors Identified by DHS

Identify and address barriers to timely face to face contacts with children in maltreatment assessments and investigations to ensure that these contacts occur within statutory timelines (MNCFSR Item 1).

Review and Revise agency screening criteria to ensure that educational neglect reports are assigned for a maltreatment investigation or assessment (MNCFSR Items 1 and 4).

Access T & TA to review agency screening practices and procedural requirements in conducting child protection assessments and investigations.

The Department initially identified Items 1 and 4 on one case as an Area Needing Improvement, however, upon further

discussion with the Band, rated the items as a strength. Upon further review with Division Director Erin Sullivan Sutton the Department again cited these items as an Area Needing Improvement.

At issue was an educational neglect case that was reviewed in the MNCFSR. The Band did not complete a full child protection investigation on the subject child.

The Band asserts that this is not substantial child endangerment that warrants a child protection investigation, and that culturally it would not fit for the Band to conduct such assessments on an educational neglect case filed by the school.

PIP Recommendation**Applicable CFSR Item****Baseline Performance****Standard/Expected Goal**

Identify and address barriers to timely face to face contacts with children in maltreatment investigations to ensure that face to face contacts occur within timelines.

Item 1

50% of cases were rated as a strength; One non-substantial and one substantial child endangerment report were not responded to within state statutory timelines. {Quarterly data indicated 100% of substantial child endangerment reports were responded to within timelines.}

90% of Substantial Child Endangerment and non-substantial child endangerment reports need to be responded to within state statutory timelines

NA

NA

Review and revise agency screening criteria to ensure that educational neglect reports are assigned for a maltreatment investigation or assessment.

Items 1 and 4

Item 4: 83.3% of cases rated as a strength.

NA

NA

Access training and technical assistance to review agency screening practices and procedural requirements in conducting child protection assessments and investigations.

NA

Stakeholders indicated screening criteria is unclear to them and inconsistent decision making screening reports.

Mandated reporters do not receive written letters for decisions.

SSIS and Other**Reports Available for Monitoring Goals**

SSIS General Report:
Time to Initial Contact with Victim/Other

Safety

Safety: What are *we* worried about?

Tribal Risk Factors

Identified in the MNCFSR Items 1 and 4

→RESPONSE

Item 1 Timeliness to initiating investigations of reports of child maltreatment.

Item 4 Risk of harm to child.

Both Item 1 and 4 were cited in the review of an educational neglect file. The Band asserts that the child was not at risk of child endangerment given the reason for case opening, which was educational neglect.

The procedure within the Tribe for educational neglect cases opening to child protection includes the local schools (Bagley,

Mahnomen, Waubun-Ogema-White Earth, Detroit Lakes, Park Rapids, Pine Point, Naytahwaush Charter, and Circle of Life Survival School, filing a petition in Tribal Court for educational neglect. Because the school is the petitioner, under Tribal Code, the burden of proof for the case is upon the school. The Indian Child Welfare Department is a participant in the proceedings until it is substantiated by the Tribal Court. The School files their educational neglect petition and it is scheduled in Tribal Court. Indian Child Welfare receives notice from the Tribal Court of a court hearing pertaining to said child for educational neglect purposes, with the school holding the burden of proof responsibilities. Indian Child Welfare conducts a membership eligibility check to ensure that the child is eligible for enrollment or a first generation descendent with White Earth. If the child qualifies for membership then Indian Child Welfare attends the initial hearing in court. If the petition is substantiated at the initial hearing, and the child is eligible for membership, then Indian Child Welfare is given party status and responsibility under child welfare to monitor the child's attendance and report back to the Court. Under our Tribal Code Indian Child



Welfare is not responsible to conduct maltreatment investigations on this type of case. Further, it is not in Indian Child Welfare's screening criteria to perform a maltreatment investigation upon the family.

The Tribe asserts that it would not be culturally acceptable to initiate a child maltreatment investigation upon one of our families for educational neglect purposes. Further, the Tribe asserts that it is acceptable within the AICWI legislation to do things differently from Minnesota County procedure, which was largely the basis of the AICWI – to do things in a culturally acceptable manner. The Tribe asserts that these children are not screened in culturally for being at risk of maltreatment that warrants a maltreatment investigation based solely upon their attendance at school.

→Strengths: what are the good things?

The Tribe had 100% Strength ratings in the remaining safety items Repeat Maltreatment and Services to prevent entry or re-entry into foster care. Quarterly performance data indicates that the Tribe responds timely to reports of substantial child endangerment at a rate significantly higher than the state average, most quarters at a rate of 100 percent. In fact, the Tribe has a higher screen in rate and maltreatment assessment follow up rate than most counties. The Tribe takes the issue of child safety seriously, and the remaining data proves this priority for the Tribe.

→ Next Steps: what are we going to do?

The Tribe will request, through it's AICWI Coordinator, additional dialogue between the Department of Human Services and the White Earth Nation to further discuss and resolve the issues related to requirements and expectations for responding to reports of educational neglect prior to being mandated to implement something that is culturally not acceptable to the Band.

Measurement: Discussion has occurred and issue has been resolved between the Band and the Department. Additional dialogue has occurred between Jeri Jasken and Kris Johnson. A solution to this issue has been reached. White Earth Nation will submit a request for waiver for this provision in Minn. Stat. § 626.556 per process agreed upon in the AICWI grant contract. Jeri Jasken will submit waiver request to Kris Johnson.

Performance Goal: Request for a waiver has been submitted.

Written report to DHS: Mike Thompson, Quality Assurance

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

Lead: Mike Thompson, Quality Assurance

Goal: The Tribe will have face to face contact with children within required timelines in 90 percent of maltreatment reports.

The Tribe will review required response timelines with investigation and assessment workers.

The Tribe will review the SSIS General Report "Time to Initial Contact with Victim/Other" on a monthly/quarterly basis to identify barriers to timely contact.

The Tribe will develop a plan to address specific barriers identified.

Measurement: DHS Child Welfare Data Dashboard and SSIS General Report: Time to Initial Contact with Victim/Other

Performance Goal: 90%

Measured: Quarterly

Written report to DHS: Mike Thompson, Quality Assurance

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

Lead: Mike Thompson, Quality Assurance

→ Stakeholder Concern: screening criteria is unclear and screening decisions are inconsistent. Mandated reporters do not receive letters stating investigation and assessment results.

DHS suggested in their PIP comments that the agency access training and technical assistance to review agency screening practices and procedural requirements in conducting child protection assessments and investigations.

→ RESPONSE:

The Band noted that this suggestion was based on stakeholder opinion that they don't receive formal letters, therefore they do not always know the screening outcomes and maltreatment assessment results. That leads to opinions formed by stakeholders that the screening criteria is unclear and screening decisions are inconsistent.

Further, the Band responds that DHS did not identify any specific cases in their MNCFSR review where inconsistent screening decisions were made which warrants further action by the Tribe.

The Band gave DHS its screening guidelines, policies and procedures following the MNCFSR process. These documents were available to not only DHS but also the public upon request, including any and all stakeholders. They have been subject to critique by the DHS but the Band has not received any response from the DHS on the documents submitted. The Band is open at any time to dialogue with DHS about the screening criteria, guidelines, process, policies, and procedures and would welcome any training or technical assistance offered by the DHS.

The Band indicated during the MNCFSR onsite review that mandated reporters do not receive formal determination letters from Indian Child Welfare. The Band cited this is a cultural issue because although our territory area is geographically large, our *communities* are very small. If the Indian Child Welfare Department sent out a letter to a home address it is not clear if the recipient would be the reporter or not. In our community most people have a post office box rather than home delivery because we have a lot of villages. People in villages receive mail at the post office. Because of transportation issues, many people rely upon one person to pick up their mail at the post office and bring it to them.

There is typically one person at the post office picking up mail for many others. It would place reporters in jeopardy if they were receiving reports back from Indian Child Welfare naming them as a reporter.

In addition, because we have such small communities, the Band's belief is that we would be violating our members rights to privacy if we were sending out letters stating names and determinations. The recipient may or may not keep that data confidential. If they do not, then it would be detrimental to our community to have these types of letters put out there for everyone to see.

The Band has always informed a mandated reporter verbally of the determination if they call back to find out what happened with a family. The Band, in response to the stakeholder concern, has informed mandated reporters verbally that they can receive this information if they call back to Indian Child Welfare and request that information. The Band has informed our stakeholders of this policy verbally and in writing to their agencies.

→ Next Steps: what are we going to do?

Goal: The Tribe will request, through the AICWI Coordinator, additional dialogue between the Department of Human Services and the White Earth Nation to further discuss and resolve the issues



related to notifying mandated reporters of screening decisions and results of investigations and assessments conducted by the Tribe. Jeri Jasken and Kris Johnson will have some additional dialogue to find a resolution for how to implement Minn. Stat. § 626.556, subd. 3 (d) taking into consideration Band's concern for potential data privacy breach when notifying mandated reporters. State statute does not specify method for notification.

Measurement: Discussions have occurred and issue has been resolved

Performance Goal: 100 percent

Written report to DHS: Mike Thompson, Quality Assurance

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

Lead: Mike Thompson, Quality Assurance

→Permanency

Risk Factors Identified by DHS

Ensure efforts to facilitate frequent, quality visitation between children and their fathers and siblings placed in separate foster homes (CFSR Item 13).

PIP Recommendation

Ensure efforts to facilitate frequent, quality visitation between children and their fathers and siblings placed in separate foster homes

Applicable CFSR Item

Item 13

Baseline Performance

50% of cases were rated as a strength

Standard/Expected Goal

NA

SSIS and Other Reports Available for Monitoring Goals

NA



Permanency

Permanency: What are we worried about?

Tribal Risk Factors

Identified in the CFSR Item 13

→ RESPONSE

Item 13 Visits with parents and siblings in foster care.

The Band achieved 50% compliance on this performance indicator. The Band would like to improve upon visitation for children in foster care both with their siblings and with their fathers.

→ Strengths: what are the good things?

The Tribe had excellent performance indicators throughout the remaining permanency items. The Tribe has excellent rates of achieving culturally appropriate permanency for its children and scored higher in most indicators throughout this section than the state.

The Tribe has a high rate of sibling placements in the same home, as well as placements with relative families. Both of

these systemic performance indicators result in better outcomes for children to be with their siblings, visit other siblings not placed with them, and visiting fathers if they are placed with paternal relatives.

→Next Steps: what are we going to do?

Goal: Improve the frequency and quality of visitation between children in out of home placement and their fathers and siblings placed in separate foster homes.

- a. **Caseworkers and foster care workers will be instructed to find a relative placement for all of the siblings to reside together whenever safe and appropriate. This will be stressed as a priority by issuing the policy in writing to staff and reviewing progress quarterly between supervisor and staff.**

Measurement: SSIS General Report

Performance Goal: 75%

Measured: Quarterly

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:



3rd Quarter:

4th Quarter:

Lead: Mike Thompson, Quality Assurance

b. Caseworkers and foster care workers will be instructed to find relative placements where the siblings can interact and visit with one another if they are placed separately. This will be stressed as a priority. Foster care workers will be instructed to arrange respite between the homes so siblings can have extended overnight visits.

Measurement: pulling SSIS case notes and court reports

Performance Goal: 90%

Measured: Quarterly by the Band

Lead: Mike Thompson, Quality Assurance

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

c. The Tribe has an expectation that fathers of all children in out of home placement are identified and

named on the children's out of home placement plan. Caseworkers will be instructed to locate fathers and engage them in visitation with their children. This will be a priority stressed by the Band in writing through the Director to staff.

Measurement: Review of SSIS case plans and court reports

Performance Goal: 40%

Measured: Quarterly by the Band

Lead: Mike Thompson, Quality Assurance (Mike Thompson, ICW)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

d. The agency supervisor reviews all out of home placement plans to ensure clear and concise visitation plans are included in the document.

Measurement: Review of 12 randomly selected out of home placement plans per quarter, conducted by Quality Assurance.

Performance Goal: 40%

Measured: Quarterly by the Tribe

Lead: Mike Thompson, Quality Assurance

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:



PIP Recommendation	Applicable CFSR Item	Baseline Performance	Standard/Expected Goal	SSIS and Other Reports Available for Monitoring Goals
Identify and address barriers to engaging fathers in child welfare cases.	Item 13,16,17,18,20	Item 13: 50% of cases rated as a strength.	NA	NA
Ensure comprehensive assessment of needs and provision of appropriate services for children and fathers	Item 17	Item 16 50% Item 17 33.3% Item 18 66.7% Item 20 83.3%	NA	NA
Ensure placement of children in a licensed foster home or facility when the agency has placement authority	Item 17		NA	NA NA
Ensure children's physical and dental health needs are assessed and that needed treatment is provided.	Item 22	Item 22: 25% of cases rated as a strength.	NA	

Wellbeing

→Wellbeing

Risk Factors Identified by DHS

Items 13, 16, 17, 18, 20

Concern cited by reviewers:

Identify and address barriers to engaging fathers in child welfare cases.

Item 13: Visits with parents and siblings in foster care

The Band achieved 50% compliance on this performance indicator. One case reviewed included a child in foster care who had a father incarcerated for over one year term. The mother, who had custody of the child, had chemical dependency issues resulting in significant child maltreatment and subsequent removal.

Upon review of this file the DHS team felt the child should have been granted visits with the father and the Band should have given the father a case plan to work while he was in prison.

In another case file review one child was placed on the Reservation in a White Earth preadoptive home. This child had significant medical needs. The child's two siblings were in

another White Earth preadoptive home in the Twin Cities area. The other two children had significant behavioral needs. The worker transported the children monthly for visitation, but missed one month during the period under review.

Wellbeing: What are we worried about?

Tribal Risk Factors identified in the CFSR Items 13, 16, 17, 18, 20

→ RESPONSE

Item 13: Visits with parents and siblings in foster care

Item 16: Relationship of child in care with parents.

Item 18: Child and family involvement in case planning.

Item 20: Worker visits with parents.

The case in question consisted of a child in foster care with a father incarcerated. It fell below the Department's expectations that the Tribe should have provided visitation or case planning to the father.

The Band was disappointed by achieving only 50% compliance on this indicator with cases reviewed. It would like to improve upon case planning activities with fathers as well as increased visitation with siblings in foster care.

→ Strengths: what are the good things?

The Tribe demonstrated good performance indicators on other measurable items. These two cases in particular are quite subjective in nature in terms of how often should siblings visit one another, especially given roundtrip distances of 500 miles? The Tribe felt it was a strength that the children had visited one another almost every month, and the Tribe felt it had poured a lot of resources into ensuring this happened frequently. The Tribe has an excellent record of maintaining siblings in placement together in the majority of sibling placement cases.

In the case of the incarcerated father, the Tribe has not supported prison visits between children and their fathers. In many cases, however, the Tribe has given fathers in prison case plans to work on when they have the opportunity to be released within a reasonable timeframe pursuant to the child protection case. The Tribe has accommodated telephone appearances for incarcerated fathers during child protection hearings, to allow their participation.

→ Next Steps: what are we going to do?

Goal: Improve efforts to engage fathers in case plans, visitation, and ensure comprehensive assessments of needs and provision of services to fathers; increase the frequency of worker visits with fathers.

Item 13

- a. **Caseworkers and foster care workers need to emphasize finding placements where all of the siblings can reside in the same home. This will continue to be stressed as a Departmental priority in writing by the Supervisor and placements recorded on SSIS will be reviewed.**

Measurement: SSIS General Reports

Performance Goal: 90%

Measured: Quarterly

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

Lead: Mike Thompson, Quality Assurance



Items 16, 17, 18, 20

b. Caseworkers need to emphasize finding fathers to children who are otherwise unengaged. Workers need to attempt to actively engage fathers in case planning, visitation, and placement when their children are in foster care. This will be issued in writing by the supervisor, and monitored on SSIS.

Measurement: SSIS case notes

Performance Goal: 75%

Measured: Quarterly

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

c. The Tribe will review expectations for identifying and engaging fathers.

Measurement: SSIS case notes and case plans

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

d. The agency supervisor will review relevant practice guides with staff as well as bring in a Traditional Anishinabe teacher to relate the importance of fathering in the Anishinabe way.

Measurement: Guides and training have been completed

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

Item 17

Goal: Ensure placement of children in a licensed foster home or facility when the agency has placement authority.

- a. Caseworkers need to ensure a home is licensable prior to placing children under ICW physical custody there for the purposes of a foster care placement**

Measurement: Foster Care files, review of criminal background checks and social services history checks.

Performance Goal: 90%

Measured: Quarterly

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

Risk Factors Identified by DHS

Item 22: Ensure children’s physical and dental health needs are assessed and that needed treatment is provided.

→ Next Steps: what are we going to do?

Goal: Caseworkers will ensure during monthly home visits that children’s physical and dental needs are provided.

- a. ICW policy is that all children in foster care receive a physical, dental, and optical exam within 60 days of placement. This policy will be reviewed in writing with all foster parents and ICW staff.**

Measurement: SSIS medical checkup indicator

Performance Goal: 100%

Measured: Quarterly

Written report to DHS: (Mike Thompson, Indian Child Welfare)

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:



The White Earth Band of Ojibwe will be striving to improve performance indicators highlighted on the CFSR by the Department. The Tribe is committed to the children and parents served through its program.

Draft of PIP submitted to DHS on 4/7/11; 8/10/11; 8/11/11

Review of Draft completed by DHS: 6/2/11; 8/10/11; 8/11/11

Date PIP Approved: 6/6/12

Due Dates for Quarterly Updates:

1st Quarter: July 15, 2012 (for April - June, 2012)

2nd Quarter: October 15, 2012 (for July - August, 2012)

3rd Quarter: January 15, 2013 (for October – December, 2012)

4th Quarter: April 15, 2013 (for January – March, 2013)

DATE PIP Progress Reports Received by DHS:

1st Quarter:

2nd Quarter:

3rd Quarter:

4th Quarter:

PIP Completion Date:

