

Indian Child Welfare Act and Minnesota Indian Family Preservation Act Compliance Case Review

Program Improvement Plan Form

Pursuant to Min. Stat. §477A.0126, county agencies must use this form to submit an Indian Child Welfare Act (ICWA) and Minnesota Indian Family Preservation Act (MIFPA) Performance Improvement Plan (PIP) as part of the Minnesota Department of Human Services (department), Indian Child Welfare Compliance case file review. This PIP form assists agency's performance with implementation of ICWA and MIFPA requirements by identifying concrete goals and strategies to address gaps in practice.

The county agency's PIP does not begin until its plan has been approved. To submit a PIP, email it to the ICWA compliance consultant assigned to the agency's PIP discussion development. The due date is 30 calendar days from initial PIP development with an ICWA compliance consultant.

County contact information

County: Ramsey

Date: October 25, 2021

Primary contact information

Bobbi Jo Potter
Manager, Children and Family Services Division – Indian Child Welfare
BobbiJo.Potter@co.ramsey.mn.us
651-266-4949
160 Kellogg Blvd E
St. Paul, Minnesota 55101

Select the areas below identified as out of compliance for which submitting a Performance Improvement Plan:

- ☒ Inquiry
- ☒ Minnesota Indian Family Preservation Act notice
- ☒ Indian Child Welfare Act notice
- ☐ Active efforts
- ☐ Due diligence in finding Qualified Expert Witness (QEW).
- ☐ Due diligence in following placement preferences

Pre-planning

Review areas identified as out of compliance

Information is available to help agency staff prepare its PIP through tableau server data outcomes regarding specific areas of non-compliance. For information on agency's outcome, see [Tableau Server Link](#) for case-specific performance. If issues with accessing the Tableau Server link, email dhs.csp.research@state.mn.us for assistance.

Collaborators:

List all individuals involved in creating this plan. Strong performance improvement plans involve diverse perspectives from tribal partners and employees at various levels of the organization.

Tribal Partners: Leech Lake Band of Ojibwe, Red Lake Nation, Mille Lacs Band, Grand Portage, Fond du Lac, Bois Forte, White Earth Nation,

Community Partners/Members: John Day, Shannon Geshick, Tonya Long, Kelly Miller, John Poupart, Sheri Riemers, Ain Dah Yung Center, Minneapolis American Indian Center, Indian Child Welfare Law Center, American Indian Family and Children's Services, Ramsey County ICWA Advisory Board,

Other Counties: Hennepin and St. Louis County

RC County: Anne Barry, Windy Ross, Anthony McWell, Chris Hurla, Heather Capistrant, Lois Cheeseboro, David Hererra Santacruz, Bobbi Jo Potter, Indian Child Welfare Unit,

Current and proposed improvement strategies

Current performance

Enter county agency's current performance for the three areas identified as out of compliance. (Note: Must be entered as a percentage. Current performance is in Tableau Server from the Child Safety and Permanency Division. In this section, agency staff are requested to choose at least three areas in need of improvement and create a plan to address a practice, including improvement strategies, action steps and responsible parties.

Area one identified as out of compliance: Inquiry

Current performance %: 25%

The following barriers were identified via case audit, learning existing practices, and consultation with community members, tribal partners, and Ramsey County (RC) staff. Barriers include: Inconsistent knowledge and understanding of ICWA/MIFPA inquiry requirements. Limited availability and access to ICWA/MIFPA learning opportunities. Limited check and balances to provide in the moment feedback and guidance to staff. Limited number of staff within agency who represent the community served.

Strategy A: Assess current Inquiry practice and make needed changes.

Action steps for strategy A

1. Review current Inquiry knowledge, expectations, accountability measures, and practices within the agency.
2. Provide Social Service Information System (SSIS) ICWA learning opportunity to community, American Indian Partnership Group, and tribal partners participating in this process.
3. Collaboratively develop Inquiry protocol with community, American Indian Partnership Group, tribal partners, and RC staff.
 - a. Provide learning opportunity to all current and new staff on inquiry protocol and expectations.
 - b. Provide learning opportunity on quarterly basis.
4. Collaboratively develop Inquiry training/learning opportunity with community, American Indian Partnership Group, tribal partners, and RC staff.
 - a. Learning opportunity should include how to document efforts in the ICWA tabs and case notes.
 - b. Provide learning opportunity to all current and new staff on a quarterly basis.
5. Supervisors and County Attorneys will ensure that proper inquiry was done in all cases by asking staff, during all consultation, who they completed inquiry with and identify a plan to ensure that all inquiry requirements are met or communicated with ongoing worker at case transfer. Proper inquiry is done when

the mother, father, child, Indian custodian, extended family members, and tribal partners are asked about heritage. It's completed at the beginning, screening, and throughout the life of the case.

6. Develop a case audit process or other accountability measures with community, American Indian Partnership Group, tribal partners, and staff.
 - a. Complete random case audit and provide feedback to staff and supervisor.
7. Include inquiry into Family Group Decision Meeting (FGDM) and safety planning process.
8. Develop expectations and guidance on how to diligently locate parents.
 - a. Specifically focusing on fathers to address lack of father inquiry and engagement.

Responsibility for strategy A

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Resources for strategy A

ICW Manager, ICW Supervisor, and Early Intervention Team (EIT).

Area two identified as out of compliance: MIFPA Notice

Current performance %: 0%

The following barriers were identified via case audit, learning existing practices, and consultation with community members, tribal partners, and RC staff. Barriers include: Inconsistent knowledge and understanding of MIFPA notice requirements. Limited availability and access to ICWA/MIFPA learning opportunities. Current process not set up to meet requirements. Limited check and balances to provide in the moment feedback and guidance to staff.

Strategy A: Assess current MIFPA Notice practice and make needed changes.

Action steps for strategy A

1. Review current MIFPA knowledge, expectations, accountability measures, and practices within the agency.
2. Provide expectations for MIFPA notices on who does them when.
 - a. Provide supports via cheat sheets, flow charts, training, and one to one guidance.
3. Develop process to track responses from tribes and diligently follow up on tribal responses we have not received.
4. Develop process for how to send updated genogram information and request new determination.
5. Develop process to include tribal partners in screening process.
 - a. Clarify what we send to tribes, when we send it, and via what means.
6. Collaboratively develop MIFPA learning opportunity with community, American Indian Partnership Group, tribal partners, and RC staff.
 - a. Learning should include section to cover the spirit of the law and be from a cultural perspective.
 - b. Learning should include how to document efforts in the ICWA tabs and case notes.
 - c. Provide learning opportunities to all current and new staff on a quarterly basis.
7. Support social worker reassigned to assist with basic learning opportunities and completion of MIFPA notices for intake and ongoing child protection.
 - a. Created flow charts, cheat sheets, and began presenting to Intake units on the basic process.
 - b. Monitor demand and ability to meet need. If need is too large look into additional FTEs to support.
 - c. Include support social worker and Nokomis Circle liaison in emails about the case at the point of screening to begin working on the MIFPA notice at the earliest point possible as the timeline starts

at the point of screening. Also, to ensure that the Nokomis Circle Liaison is given notice as early as possible.

- d. Look into contracting with community agency to follow up on responses.
8. Supervisors and County Attorneys will ensure that proper MIFPA notice was done in all cases where we have reason to believe we are working with an American Indian child by asking staff, during consultation, when notice was sent, who it was sent to, what the response was, and if the genogram included paternal and maternal grand and great grandparents.
 - a. If genogram did not include great grandparents develop plan to actively identify those relatives for proper tribal determination.
9. Develop a case audit process or other accountability measures with community, American Indian Partnership Group, tribal partners, and staff.
 - a. Complete random case audit and provide feedback to staff and supervisor.
10. Include genogram development into FGDM and safety planning process.
11. Assess and develop relative search process.
12. Explore relationship with Minnesota Chippewa Tribe (MCT) for inquiry and relative search.
13. Clarify process for MIFPA notices with Minneapolis American Indian Center.
14. Connect workers who express need or have identified need with completing MIFPA notices to the DHS 209A ICWA training.
15. Develop clarity around MIFPA notices with vendor agencies and assess need for learning opportunity.
16. Develop process, learning opportunities and follow up for afterhours process.

Responsibility for strategy A

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Resources for strategy A

ICW Manager, ICW Supervisor, Support Staff, Additional FTEs, Nokomis Circle Liaison, and EIT team.

Area three identified as out of compliance: ICWA Notice

Current performance %: 0 %

The following barriers were identified via case audit, learning existing practices, and consultation with community members, tribal partners, and RC staff. Barriers include: Inconsistent knowledge and understanding of ICWA notice requirements. Current process not set up to meet requirements. Limited availability and access to ICWA/MIFPA learning opportunities. Limited check and balances to provide in the moment feedback and guidance to staff.

Strategy A: Assess current ICWA Notice practice and make needed changes.

Action steps for strategy A

1. Review current ICWA knowledge, expectations, accountability measures, and practices within the agency.
2. Provide expectations for ICWA notices on who does them when.
 - a. Provide supports via cheat sheets, flow charts, training, and one to one guidance.
3. Develop process to track responses from tribes and diligently follow up on tribal responses we have not received.
4. Develop process for how to send updated genogram information and request new determination.
5. Collaboratively develop ICWA learning opportunities with community, American Indian Partnership Group, tribal partners, and RC staff.

- a. Learning should include section to cover the spirit of the law and be from a cultural perspective.
 - b. Learning should include how to document efforts in the ICWA tabs and case notes.
 - c. Provide learning opportunities to all current and new staff on a quarterly basis.
- 6. Support social worker reassigned to assist with basic learning opportunities and completion of ICWA notices for intake and ongoing child protection.
 - a. Created flow charts, cheat sheets, and began presenting to Intake units on the basic process.
 - b. Monitor demand and ability to meet need. If need is too large look into additional FTEs to support.
 - c. Look into contracting with community agency to follow up on responses.
- 7. Supervisors and County Attorneys will ensure that proper ICWA notice was done in all cases where we have reason to believe we are working with an American Indian child by asking staff, during consultation, when notice was sent, who it was sent to, what the response was, and if the genogram included paternal and maternal grand and great grandparents.
 - a. If genogram did not include great grandparents develop plan to actively identify those relatives for proper tribal determination.
- 8. Develop a case audit process or other accountability measures with community, American Indian Partnership Group, tribal partners, and staff.
 - a. Complete random case audit and provide feedback to staff and supervisor.
- 9. Include genogram development into FGDM and safety planning process.
- 10. Include Nokomis Circle liaison in emails about Emergency Protective Care (EPC) hearings.
- 11. Assess and develop relative search process.
- 12. Clarify process for ICWA notices with Minneapolis American Indian Center (MAIC).
- 13. Connect workers who express need or have identified need with completing ICWA notices to the DHS 209A ICWA training.
- 14. Work with ICWA court to develop process and expectations around not scheduling an admit deny hearing if the notice wasn't sent out 10 days prior to the proposed date.
- 15. Develop process, learning opportunities and follow up for afterhours process.

Responsibility for strategy A

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Resources for strategy A

ICW Manager, ICW Supervisor, Support Staff, Additional FTEs, Nokomis Circle Liaison, and EIT team.

Area four: Active Efforts

Current performance %: 100%

Improvement needed in Active Efforts – Identified by American Indian community.

Conversations with the American Indian community revealed areas where active efforts could be improved.

Strategy A: Increase staff understanding of Active Efforts

Action steps for strategy A

- 1. Collaboratively work with community to access active efforts and the impact.
- 2. Work with American Indian Advisory Committee to develop an Active Efforts Protocol for workers.
- 3. Develop a case audit process or other accountability measures with community, American Indian Partnership Group, tribal partners, and staff.
 - a. Complete random case audit and provide feedback to staff and supervisor.
- 4. Collaboratively work with ICWA Advisory Council to develop clarity around active efforts, expectations, and culturally inclusive efforts.

- a. Focus on training to build knowledge and skills around identifying safety vs. threat.
 - b. Develop process and expectations around safety plans as an active effort to prevent placement and to return a child asap.
 - c. Review RC interim case plans and work with community to create culturally inclusive, collaborative, family specific, and in line with active efforts.
- 5. Collaboratively create learning opportunities regarding active efforts and provide on immediate and ongoing basis for current and new staff.
 - a. Learning should include identifying Active Efforts.
 - b. Learning should include documenting efforts in ICWA tabs and case notes.

Responsibility for strategy A

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Resources for strategy A

ICW Manager, ICW Supervisor, Support Staff, Additional FTEs, Nokomis Circle Liaison, and EIT team.

Area five: Qualified Expert Witness

Current performance %: 100%

Improvement needed in Qualified Expert Witness – Identified by American Indian community.

Conversations with the American Indian community revealed area for improvement.

Strategy A: Create a list of QEWs for tribes.

Action steps for strategy A

- 1. Participate in QEW training to increase knowledge and understanding of qualifications.
- 2. Strengthen relationships with out of state tribes.
- 3. Work with liaisons in American Indian community
 - a. Survey community to identify local QEWs who can act on behalf of tribes.
- 4. Build relationships with American Indian non-profits and community members, use as a resource.
- 5. Develop internal process for documenting QEW in ICWA tabs.
 - a. Present to workers and provide follow up to ensure process is followed.

Responsibility for strategy A

ICW Manager, ICW Supervisor, Support Staff, Additional FTEs, Nokomis Circle Liaison, and EIT team.

Resources for strategy A

American Indian staff to develop relationships with tribes.

Compensation for American Indian participating community members.

Additional information

Outline the internal PIP monitoring process. How does agency staff plan to monitor progress toward identified action steps?

PIP will be reviewed quarterly during the American Indian Partnership meeting. Updates will be provided on what progress has been made. Smaller groups will be pulled together to move some of the work forward. ICW Manager and Supervisor will monitor the PIP ongoing to ensure progress.

Below are additional efforts being taken to increase compliance and bring down our disparities for American Indian children:

Strategy A: Develop and implement hiring, recruitment, and retention practice that supports hiring a larger number of Social Workers and Case Aides from American Indian community and/or having more advanced knowledge of ICWA/MIFPA. Importance placed on retaining staff.

Action steps for strategy A

1. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff on embedding American Indian culture from the Dakota and Anishinaabe in all aspects of the work.
2. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff on identifying desired qualities of an ICWA Manager, Supervisor, intake worker, ongoing child protection worker, case aide, clerical, and so on.
3. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff on developing job postings and job descriptions that incorporate desired qualities and elevate those lived experiences within the American Indian Community.
4. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff and include in hiring process for open ICW Unit positions and other contracted services interviews.
5. Embed ICWA/MIFPA question in all interviews.
 - a. Elevate candidates who have lived experience within the community and/or extensive experience doing the work.
 - b. Serious contemplation should be given to those who have no experience or knowledge but have been working in the field.
 - i. Candidates that are hired or promoted without solid understanding of the spirit and provisions of ICWA should have a clear plan and accountability measures to ensure progress and to limit harm to the community.
6. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff to create a work environment that is grounded in both the 7 Grandfather Learnings and the Dakota Virtues.
 - a. Change perspective on who the people we serve are to us. Instead of clients, the people we serve, or children and families they will be referred to as our relatives and be treated as our relatives would be treated.
7. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff to develop and identify Resiliency, trauma and healing learning opportunities for staff and our relatives.
8. Collaboratively work with community, American Indian Partnership Group, tribal partners, and RC staff to identify upcoming and ongoing learning opportunities and community events available to staff.
9. Identify culturally specific learning opportunities facilitated by American Indian community members.
10. Develop mandated onboarding and ongoing learning plan for ICW unit workers and for non- ICW workers.
 - a. Learning to include information on Fort Snelling, Dakota 38, Sandy Lake Tragedy and other events that impact the American Indian Community.
11. Increase system knowledge and acceptance of traditional healing methods as an appropriate and acceptable alternative to western medicine.
12. Develop expectations for mandated learning for all staff around ICWA/MIFPA training and review in yearly appraisal.
13. Attendance at ICWA and American Indian cultural learning opportunities will be supported.

Responsibility for strategy A

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Resources for strategy A

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Strategy B: Develop and maintain new and ongoing relationships with community members, tribal partners, and service providers.

Action steps for strategy B

1. Review contracts with community providers and assess goals, outcomes, ongoing need, and ensure proper funding in place to support the work.
2. Execute contracts with American Indian non-profits and community members.
 - a. Develop surveys for families that have been involved in the Ramsey County system. Ramsey County will use survey feedback for self-assessment. (Qualitative)
 - b. Develop appropriate outcome measures for Ramsey County ICWA families. (Quantitative)
3. Implement a culturally specific Parent Support Outreach Program to reduce placement of American Indian children and involvement of American Indian families in the child protection system.
4. Build relationships with American Indian non-profits, use as a resource.
5. Collaboratively work with community members, tribal partners, and service providers to develop cultural center.
6. Collaboratively work with community members, tribal partners, and service providers to develop more opportunity and access to afterhours support.
7. Collaboratively work with community members, tribal partners, and service providers to develop and facilitate preventative community learning sessions.
8. Collaboratively work with community members, tribal partners, and service providers to develop culturally inclusive and self-driven case plans.
 - a. Develop learning plan and work closely with Tribal Partners, RC ICW, Nokomis Circle Liaison and EIT team to train staff and normalize the process. Work on infusing culture into SOS practice.
 - b. Work with American Indian Partnership group, Tribal Partners and the ICWA Advisory Council to review petitions, court reports, interim case plans, tiered case plans, and reducing maltreatment findings by looking at statute requirements and consider impact on family.
9. Increase collaboration with Parent Mentor programs.
10. Work with community elders, spiritual advisors, community members, tribal partners, and community service providers.
 - a. Seek guidance on traditional healing practices, developing and caring for a program.
 - b. Seek guidance on decision making points: screening of maltreatment reports, pre-petition screening, permanency review team, and case closure.
 - c. Provide learning opportunities.
 - d. Develop a process for team to culturally process death of a relative.
11. Collaboratively work with community members, tribal partners, and service providers to facilitate listening sessions.
12. Collaboratively work with the Office of Equity, Diversity, and Inclusion at the Department of Human Services, community members, tribal partners, and service providers to explore Truth and Healing/Truth and Reconciliation work.
13. Collaboratively work with community members, tribal partners, and service providers to develop culturally inclusive Domestic Violence learning that can be delivered in person, virtually, and in the jail and prison system.
14. Collaboratively work with community members, tribal partners, and service providers to develop more supports and services for fathers.
15. Work with community members, tribal partners, and service providers to complete an institutional analysis.
 - a. Focus on how workers are organized to do the work.
16. Explore membership with National Indian Child Welfare Association (NICWA).

17. Collaboratively work with community members, tribal partners, and service providers to identify ways to utilize elders from the community to mentor parents.
18. Explore options for culturally inclusive FGDM/Safety planning meetings. Could be in the form of one or all the following: Specific learning plans for EIT team, Recruit American Indian staff to do FGDM, and/or Explore contract with community agencies.
19. Expand recruitment for Request For Quotes (RFQ) on ICW Consultant to handle external complaints and complete internal case audits.
20. Improve communication and transparency with community members, tribal partners, and service providers.
 - a. Sent the 2021 ICW PIP, sought feedback, and invited to join PIP team:
 - i. Tribal Partners: Leech Lake Band of Ojibwe, Red Lake Nation, Mille Lacs Band, Grand Portage, Fond du Lac, Bois Forte, White Earth Nation,
 - ii. Community Partners/Members: John Day, Shannon Geshick, Tonya Long, Kelly Miller, John Poupart, Sheri Riemers, Ain Dah Yung Center, Minneapolis American Indian Center, Indian Child Welfare Law Center, American Indian Family and Children Services, Ramsey County ICWA Advisory Board,
 - iii. Other Counties: Hennepin and St. Louis County
21. Collaboratively work with tribal partners and community providers to coordinate interagency gatherings on tribal lands and at community agencies.

Responsibility for strategy B

Ramsey County Manager, Ramsey County Supervisor, County Attorney staff, Ramsey County staff.

Resources for strategy B

ICW Manager, ICW Supervisor, Support Staff, Contract Services, and DEI Liaison.



Bobbi Jo Potter
Indian Child Welfare Manager
Ramsey County, Social Services Department

Dated: December 14, 2021