A Winding Path:
Working to Protect, Use and Manage Data at the Saginaw Chippewa Indian Tribe of Michigan

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Presentation Overview

• Brief highlight of the Saginaw Chippewa Indian Tribe of Michigan (SCIT)
  • Fast growth & challenges

• Data at the Forefront
  • Data Issues
  • Shifting priorities in data protection
  • IRB & Data Work-Group
  • Stop-gap strategies

• Looking to the Future
  • Data Governance & Data Sovereignty
Tribal Membership

Total Members 3,593

• District #1: 1,636 (Isabella)

• District #2: 52 (Saganing)

• District #3: 1,905 (All Others)
Tribal Council

Chief
Sub-Chief
Secretary
Treasurer
At-Large (District 3)
Saganing (District 2)
Sgt. At Arms
5 Regular Members
(L to R:) Bill Federico, Theresa Jackson, Louanna Bruner, Sergeant-at-Arms Kenny Sprague, Treasurer Craig Graveratte, Sub-Chief Julius S. Peters, Chief Ronald F. Ekdahl, Secretary Frank J. Cloutier, Chaplain Diana Quigno-Grundahl, Lindy Hunt, Jennifer L. Wassegijig and Ron Nelson
The Saginaw Chippewa Indian Tribe of Michigan is a progressive sovereign entity dedicated to the preservation of its rich cultural history while striving to protect the interest of its indigenous community for the next Seven Generations.

Mission
FAST GROWTH!
1937 SCIT reorganized under the IRA
1972 Grassroots “Tomah Club” starts fundraiser: Car Bingo
1981 Tribally organized High Stakes Bingo
1997 Soaring Eagle Casino and Resort opens (512 rooms)
2000 SCIT largest employer in Isabella County
2006 Saganing Eagle’s Landing Casino opens
2007 Soaring Eagle Waterpark & Waabooz Golf Course opens
2008 Saganing Eagle’s Landing largest employer in Arenac County
2013 SCIT opens Hide-Away RV Park
2017 Broke ground on Saganing Eagle’s Landing Hotel
Tribal Operations Employees:
- 1987 - 40
- 2017 - 725

Tribal Fundraising Project 1987
(games operation, bingo & cards):
- 120 employees

SCIT Gaming 2017:
- Soaring Eagle Casino & Resort: 2,630
- Soaring Eagle’s Landing: 329
Tribal Programs

- SCIT is resilient
  - Culture and community are key in addressing pressing issues

- Lingering issues caused by colonization, historical trauma and oppression can’t be solved quickly or by money alone

- Late 1980s: 30 Programs
- 2018: 190 Programs and 57 Departments!

- Significant amount of Tribal dollars and grant funding going to programming and direct services to members
  - Resulting in a lot of data and some outside partnerships
  - Is it the “right” data?
DATA AT THE FOREFRONT
• More employees and interns=
  • More interpretations and representations of SCIT community by non-community members
  • Confusion about proper protocols for sharing information

• Outside partners not always knowledgeable or respectful of Tribal Sovereignty, Culture, strengths or challenges
  • Issues with accountability and obtaining proper approvals

• Misrepresentation of SCIT by local media and others without historical and contextual knowledge of SCIT

Data Issues
Challenges:

• Data often silo-ed by department

• Often collected for very specific purposes, often not Tribally driven (e.g. grants, IHS, etc.)
  • Useful for addressing pressing problems?

• Exploring data and records management strategies
  • different departments have very different needs
  • Not a lot of good information on affordable options
  • SAMHSA Tribal Tech. told us most people still using nested folders & excel

• Currently collecting what we can from depts. under Tribal Administration
• Original plan to protect tribal data focused on developing an IRB (Institutional Review Board) or Research Review Board

• 2 Day Training w/40 employees on Tribal IRB’s by Beverly Becenti-Pigman, long time Chair of the Navajo Nation IRB

• Surveyed 99 SCIT employees:
  • majority of data requests NOT Research
  • confusion over what should/should not be shared
  • Unclear on what “data” includes

• Federal Assurance of IRB’s very expensive

• So...how to protect Tribal Data in other ways?

• *Exploring Data for Nation Building* course with Dr. Stephanie Carroll-Rainie & Desi Rodriguez-Lonebear: Data Sovereignty

**Shifting priorities in data protection**
• Goals are
  • To Protect the SCIT community
  • To protect Tribal sovereignty
  • To protect information

• 16 Tribal departments represented
  • Led by Office of Grants & Contracts (Tribal Administration)

• Monthly Meetings

• Working to customize protection, collection, use, and management of data to our community’s needs

IRB & Data Work-Group
STOP-GAP STRATEGIES
Specific Point of Contact (SPOC) identified for SCIT & Partner Orgs.

- Partners must submit bi-monthly reports on progress to SPOC
- Partners must stay in regular communications with SPOC
- Partners must provide oral/visual presentations to SPOC, Administration and/or Tribal Council upon request

**Key Components:**

- Information/data to be shared
- Defines SCIT as owner of information
- Secure storage and confidentiality/privacy of data
- Limitations on use of data
- Period of agreement with return of all data to SCIT at conclusion

**Information Sharing Agreement**
“A presentation, report, published paper or any other form of dissemination using the Information shared under this agreement, including internet, shall acknowledge the “Saginaw Chippewa Indian Tribe of Michigan” and shall be reviewed by the SCIT SPOC and Tribal Administration, and shall pass before the Tribal Council for approval before submission, publication or presentation. This review process should take no longer than four weeks, unless an extension is mutually agreed upon.”

- copy of all resulting papers must be provided to SCIT

- Whenever tribe-specific Information reported with tribal approval:
  - the “Saginaw Chippewa Indian Tribe of Michigan” cited as the source of the Information
  - Data Recipient cited as the source of interpretations, calculations and/or manipulations of the Information

- SCIT shall have the right of access to all writings or work of Data Recipient(s) at all reasonable times

**Information Sharing Agreement**
Key Components:

- Intern Requirements & Expectations
  - Policy & Procedure
  - Drug testing
  - License requirements according to dept.

- Application Cover Sheet & components

- Reporting & Accountability Expectations
  - Assignment Approval Form

- Confidentiality

- Internship Agreement

- Accompanying Documents
  - Exit Survey
  - Final Evaluation
Appendix A: Intern Assignment Approval Form

Student Name: ____________________________________________

SCIT Mentor Name: _______________________________________

College Internship Supervisor/Advisor Name: ________________________

Assignment Title: ___________________________________________

Class or Requirement Assignment is for: __________________________

Date Assignment Approved: ____________ Date Assignment Due: ____________
(By Mentor)

Brief Summary of Assignment:
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________

Summary/List of Information about SCIT included in the Assignment:
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________

Intern Signature ____________________________________________ Date ____________

Saginaw Chippewa Indian Tribe of Michigan Designated Mentor Signature ____________ Date ____________
Key Components:

- Employees will complete whenever sharing information outside of their departments/programs

- Will allow us to track what is going out, inter-departmental communications & sharing, etc.

- Can help us identify best strategies to protect SCIT & better harness data interdepartmentally

- Will allow employees to pose questions, and connect with IRB & Data Work-Group for follow up

Information Request Form
LOOKING TO THE FUTURE
Data Sovereignty

- Who is controlling our data?
- Who is storing and managing our data?
- Who decides what data is meaningful?
- Who decides what data is collected?
- How does data frame our communities?
- What are the underlying values behind our data practices and polices?
- What are the best ways to collect & interpret our data?

Data Governance

- How are we protecting, collecting, using, and managing our data?
- Actual mechanisms, policies, procedures
Raising Awareness

The SCIT IRB & Data Work-Group
The Saginaw Chipewa Institutional Review Board & Data Work-Group began in late 2016 in response to concerns over protecting Tribal Data and the Tribal Community. In October of 2016, Beverly Becenti-Ragman visited from the Navajo Nation to train Saginaw Chipewa employees and community members on Institutional Review Boards (IRBs). The purpose of IRBs is to screen and oversee research, and to protect people and communities who participate in research projects.

Issues We Are Working to Address
- We developed an External Information Sharing Agreement template for partnerships with non-SCIT entities in order to protect Tribal Data and the community. The agreement identifies specific data to be collected/shared, how it will be stored and protected, and requires that information be returned to the Tribal community for Tribal use.
- Are currently developing a plan/proposal for a Research Review Board for the Saginaw Chipewa Indian Tribe to make recommendations on research proposals, oversee research, and provide oversight and accountability for research partners.
- Have worked with Human Resources, the Legal Department and other Tribal Departments to develop a draft Internship Packet (including an Internship Agreement) to standardize the process for hiring interns, and better track students working within the community.
- Created a Data Request Reporting Form to collect more information on what Saginaw Chipewa data is being requested and shared. This will assist us in better understanding what kinds of data is being requested and shared, and could inform future policies and initiatives regarding data.
- Are in the beginning stages of creating a Tribal Data Governance Plan. We plan to engage community members and employees in creating this plan, which will identify and develop values, goals, objectives, policies, and action steps related to Tribal Data issues.

Protecting Data = Protecting SCIT
When talking about data, most people think of numbers and statistics. However, data can really be a collection of facts or any kind of information. Historically American Indian Tribes and individuals have faced misrepresentation and misunderstanding in large part due to bad data, and/or misinterpretation of data. Although today, individual health, education, and financial information are protected by privacy laws like HIPAA, FERPA, Intellectual Property laws, etc., protection of collective or community privacy and information can be much more complicated, especially when that collective/community is a Tribal Nation. While many people outside of Tribal communities may have the best of intentions, they often lack the background information and context to appropriately assess, interpret, and/or draw conclusions about Tribal communities. Because of this, it is important for us to think about what kind of Tribal information or data we share with others, how we present it, and how it should or could be used for or against Tribal Nations.

A Tool for Data Protection: Information Sharing Agreement
The IRB and Data Work-Group developed an Information Sharing Agreement (ISA) template by working with the Legal Department and Tribal Administration, and Tribal Council approved it via motion. Here is a quick overview:

What is the Information Sharing Agreement?
The ISA is a document that outlines all the specifics regarding data sharing with an external partner and can be tailored to each project. It identifies specific data to be collected/shared, how it will be protected, and requires that information be returned to SCIT.

Why is it needed?
In the past, there have been a few external partners that have not completely understood their obligations as a partner, and have either misinterpreted Tribal data, not returned data to SCIT; and/or not followed through with their commitments regarding data.

When should I use it?
Whenever you are sharing information that is not already available to the public with an outside partner.

How do I use it?
The IRB & Data Work-Group and Legal Department have developed a template that has spaces to fill in the necessary information to ensure protection of SCIT data. Fill in the blanks.

Where is the ISA? Where can I get more information or ask for help?
The ISA is available through the Office of Grants & Contracts and you can get more information or assistance with the agreement by contacting anyone there. Contact information is available at: http://www.sagchip.org/grants/contact.aspx?WkuCVXC4bOS4
Interim Research Review Board proposal in development

- Currently Tribal Administration and Tribal Council review all requests
  - Board will make recommendations to council

- Will include multiple stakeholders with cultural review process as part of board or as additional step in approval process

- Will most likely not be federally assured: not enough RESEARCH requests for $$$
  - Will require researchers to also go through a University/Hospital/Federal Government IRB

- Board will also monitor research and researchers if projects approved
Strategic Planning Team of 5 members of IRB & Data Work-Group with support of Tribal Administration

- Will hold an all day session during late summer or fall to
  - Will invite community, employees & Tribal Leaders

Goals:
- Further raise community & Tribal employee awareness
- Identify values and priorities surrounding Tribal Information & Data
- Develop strategies of community engagement and identify members of community who can contribute time & energy to data efforts
- Address challenges in current approach to developing data governance plan
- Identify community driven next steps
Questions or Comments?
Miigwetch!