

# First Things First Tribal Data Policy

## Introduction and Background

Arizonans created First Things First via a citizens' ballot initiative to give more Arizona children the opportunity to start school healthy and ready to succeed. The very structure of First Things First reflects the organization's respect for and commitment to tribal sovereignty. Arizona's tribes can participate in First Things First in one of two ways: tribes may elect to have their tribal lands treated as a separate region by the statewide First Things First Board or tribes may elect to participate in the designated geographical region or regions in which their tribal lands are located. To date, a total of 19 of Arizona's 22 tribes participate in First Things First.

Those partnerships have led to the implementation of dozens of strategies that are expanding early education opportunities for children in tribal communities, supporting parents in their role as their child's first teachers and expanding the use of preventative health in areas statewide.

Comprehensive, accurate data is crucial to the success of Arizona's partnerships with tribes, and ultimately, to the creation of an effective early childhood system. Data is used to ensure informed decision-making and to measure the progress made in increasing school readiness for all children.

First Things First recognizes Arizona tribes as sovereign nations that have the right to regulate research and data collection on their tribal lands. To this end, First Things First is committed to obtaining all appropriate tribal approvals for data collection, analysis and reporting. This Tribal Data Policy was created to set forth the principles and basic process by which agreements will be sought with sovereign tribes for the collection and use of data related to children 5 and younger and their families who are members of tribes and living on tribal lands. This Policy was informed by insight shared by and feedback obtained through formal government-to-government consultation between First Things First and tribes (2010, 2011, 2012, 2013), as well as First Things First's experience in securing tribal data collection agreements as part of its process to develop regional needs and assets reports (2008, 2010, 2012, 2014) and statewide School Readiness Indicators (2014-2016).

**All data collected by First Things First are for the purpose of producing public materials, including data reports and other hard copy and online documents, that guide decision-making, measure the progress made in increasing school readiness for all children and increase public awareness of the needs of young children.**

## Definitions

This Data Policy outlines the principles that will govern First Things First's data collection partnerships with Arizona's tribes. For the purposes of this Policy, the following definitions apply:

- **Data Collection Agreement:** A formal agreement with a tribe that outlines: the specific data to be collected; the use(s) for the collected data; the sources of the data to be collected, specific

measures in place to ensure data security and the confidentiality of individuals and the process that First Things First will use to ensure that the tribe has an opportunity to review the data prior to publication.

*NOTE: Whenever possible, information regarding data sources should include the organization providing the data, the data fields to be collected and whether data can/will be disaggregated by tribal members versus non-members.*

- **Primary data collection** refers to information obtained first-hand from individual tribal members by First Things First and/or its contractors (e.g., surveys and focus groups).
- **Secondary data collection** refers to information obtained by First Things First from another organization that currently has the authority to collect the data (e.g., tribal departments or organizations and federal, state or municipal agencies), as well as data collected by First Things First from tribes under prior agreements. This information may be received in individual or aggregate form, however, information is only *published* in aggregate form. In addition, once obtained, the data may be further analyzed or disaggregated by First Things First.
- **Tertiary data collection** refers to data already lawfully obtained from the tribe and which has previously been published (e.g., reports and policy briefs). All data obtained through tertiary collection will be used in its published format.
- **Publication** refers to the availability of materials based on data in a printed and/or electronic format (e.g. Need and Assets reports, fact sheets, etc.) to individuals, groups of individuals or the general public. This does not include those responsible for collecting, storing, analyzing or preparing the data-based materials for publication. First Things First regional council members may participate in the review of information/materials prior to publication.

## Content of Data Collection Agreements

Prior to pursuing any data collection agreement, First Things First will ascertain each tribe's process for requesting and accessing the desired data (e.g., Ethics Review Board, Institutional Review Board or tribal resolution). First Things First will respect and follow each tribe's specified approval process. First Things First will not assume that the approval process completed for one set of data is the same for a different set of data.

Data collection agreements will be kept by First Things First as long as First Things First continues to house data collected under the agreement. First Things First does not anticipate the non-accidental destruction of any data.

If First Things First plans to destroy/delete any data, First Things First will first reach out to tribes to ensure the safe and efficient transfer of any data to the tribe prior to completing the destruction.

Requests for data collection agreements will include:

- context for and background on the data being requested.

- information on how the data collected will benefit the tribe, Arizona’s early childhood system and First Things First.
- identification of the type of data to be collected (including target populations), the method of data collection, and the source(s) of that data (see NOTE on Page 4).
- descriptions of the final products the data is to be used/published in.
- the term of the agreement (for recurring projects, such as regional Needs and Assets reports and School Readiness Indicators, a timeframe covering at least three rounds of data collection is recommended).
- identification (if known) of any contractors that will be collecting data.
- a provision allowing the tribe to receive information on data collected and conclusions drawn in draft format – and to provide feedback, context, etc. to the data – prior to any data-based materials being published to ensure compliance with the completed agreement. The tribe has the discretion to identify the preferred format in which the draft information should be presented (e.g., in person presentation or written report). The completed data agreement must stipulate the date by which the tribe must complete its review. In situations where there are persistent questions or concerns regarding data elements, First Things First will enter in to a consultative process with the tribe with the goal of resolving issues to ensure that the information can be made suitable for public use.
- a stipulation that affirms the tribe’s right to request their data from First Things First, and a description of the process tribes will follow to request their data.

NOTE: Unpublished data will not be released to any person or entity without written consent from the appropriate tribal government (Tribal Council or duly authorized designee).

- explicit language that First Things First does not need to seek tribal approval to use data collected under valid agreements in future publications (i.e., publications not specifically listed in the agreement) UNLESS additional data analysis is completed or additional conclusions are drawn.

Addenda to data collection agreements should only be required if collection of additional data elements (not previously identified) is desired OR if First Things First is completing additional analysis on existing data for other publications/products. Tribes will be notified if any changes occur in the contractors or vendors collecting data on behalf of First Things First during the course of the agreement.

## Data Collection

Once a data collection agreement is in place, First Things First will provide each tribe with a principal point of contact for all communications and requests associated with data collection.

In cases of **Primary Data Collection**, First Things First will provide to the tribe the name of the organization/vendor completing the data collection and associated timeframes. First Things First will

work with tribes in a consultative process on any questions or concerns with the identified data collection organization/vendor.

Participants in primary data collection activities shall be advised that information they provide is confidential and that they may withdraw permission for First Things First to use information obtained from them at any time prior to the completion of data collection activities. Cultural responsiveness will be considered when data collection tools are created for targeted populations. In addition, cultural considerations around language of data collection tools either selected or created, as well as the utilization of a variety of data collection modalities to help ensure a diverse sample, will be considered.

In cases of **Secondary Data Collection**, for each organization/agency that houses desired data, First Things First will determine the source's process/protocol for data requests and will follow that process/protocol. In some cases, First Things First may need to request assistance from the tribe in securing the data if this is required by the source's process/protocol.

Information obtained through **Tertiary Data Collection** (previously published) will be used in its published format.

## **Analysis of Data**

First Things First Research and Evaluation staff works with staff from each of the data source partners/agencies to obtain the calculation/methodology behind the accessed data to ensure First Things First's analysis plan and interpretation of the data is accurate for the selected region, the state and the representative population. Additionally, this will safeguard the integrity of the data presented in its final format, as well as what is shared with tribal leaders, regional councils, the First Things First Board and stakeholders.

When First Things First is the data source, First Things First follows the same data integrity and quality assurance check to ensure accurate data is utilized for analyses. In addition, First Things First Tribal Affairs staff and Regional staff are consulted to ensure culturally sensitive approaches are taken to handle data elements and are done in accordance with the First Things First Tribal Consultation Policy (Addendum A). Data analysis is done by the First Things First Research and Evaluation staff and/or First Things First contractors/vendors (reviewed and approved by First Things First Research and Evaluation). Data will be stored securely in the First Things First data warehouse per the First Things First Data Security Guidelines (Addendum B), and this data is made available only for the purposes outlined in the data collection agreement. All data released will be in accordance with the First Things First Data Suppression Policy (Addendum C).

## **Communication of Project Status**

First Things First shall maintain regular communication with tribes regarding the status of data collection efforts in tribal communities. The First Things First Senior Director for Tribal Affairs serves as the organization's primary statewide liaison with tribal partners and is directly responsible for communicating with tribes on issues that are broadly related to facilitating or improving First Things First's work with Arizona's tribes and nations, including Tribal Consultation, bi-annual regional

designations and representing First Things First with major tribal organizations such as the Inter-Tribal Council of Arizona and the National Indian Education Association.

First Things First regional directors are the primary local liaison and work with tribal governments to implement First Things First early childhood initiatives in their area. The regional staff is directly responsible for communicating with tribes and nations about the status of First Things First's work with the specific tribe or nation, including data collection agreements and grantee performance. First Things First will seek guidance from tribes and nations regarding their preferred method of communication. Methods of communication may include letters, electronic correspondence, presentations and status reports to tribal leaders, as needed.

## **Protection of Privacy and Confidentiality Assurance**

It is the intent of First Things First to avoid any possibility of inadvertently reporting personally identifiable information. While First Things First uses only aggregate data in its reporting, there are some cases where specific populations may include only a few individuals. In such cases, the First Things First Research and Evaluation team will enforce the First Things First Data Suppression Policy (Addendum C).

In accordance with the First Things First Data Security Policies and Standards (Addendum B), First Things First staff and contractors must ensure that all personal or sensitive information in their possession is kept secure at all times against unauthorized or unlawful loss or disclosure.

First Things First staff and contractors are aware that at no time will any identifying information be stored on portable electronic devices (such as laptop computers, tablets, digital cameras, and portable hard drives including flash drives, USB memory sticks, iPods or similar storage devices). Any transfer of data, including identifying information, must be conducted using secure, encrypted formats, ensuring user IDs are stored/transported separately.

First Things First will cooperate with tribes to ensure suitable reporting and review opportunities are established prior to publishing or publicly disseminating information.

## **Review of Data by Tribes**

Tribes will receive information on data collected and conclusions drawn in draft format prior to the data being published or publicly disseminated to ensure compliance with the data collection agreement. Tribes have the discretion to identify a preferred format in which the draft information should be presented (e.g., in-person presentation or written report). The completed data agreement must stipulate the date by which the tribe must complete its review.

## **Publication of Data**

All data collected by First Things First is for use in aggregate form (not personally identifiable) at the regional, county or state level in a variety of public formats, including, but not limited to: reports and policy briefs, web pages and marketing materials. Although data collection agreements stipulate the

specific products in which data collected will be used, First Things First reserves the right to use data previously collected/published in future publications, so long as the new publication does not involve additional data collection and/or analysis.

In addition, as a public entity, the work of First Things First is subject to state public records law. All final work products — including any material published or publicly disseminated by First Things First — are subject to public records law and must be made available for inspection upon request by any member of the public.

## **Tribal Access to Data**

First Things First has the right to store all data collected and to utilize that data consistent with this Policy and individual data collection agreements. Tribes may officially request collected data from First Things First by submitting the First Things First Tribal Data Request Form (sample attached). The form allows tribes to easily request data for specific First Things First activities, according to tribal preference and the needs of their communities. First Things First will work with a tribe to provide the data in a mutually agreeable format (e.g., Word or Excel).

SAMPLE

**FIRST THINGS FIRST TRIBAL DATA REQUEST FORM\***

Depending on the nature and format of the data being requested, formal documentation from the tribe (such as a letter/resolution from the tribal government) may be required before First Things First can release data. Requests will be assessed on a case-by-case basis, and the requestor will be notified of any tribal documentation required prior to release.

**Data Requestor:**

Name of Person Requesting Data:

Tribal Affiliation:

Contact Address:

Contact Telephone/Email:

Purpose of the data request: \_\_\_\_\_

*Example: To use for a grant proposal, for tribal data updates, for strategic planning*

Preferred Data Format: \_\_\_\_\_

*Example: Excel file, data tables of key variables from the report*

Timeframe for Receiving Data (at least 15 days required once all documentation is received) \_\_\_\_\_

**Data Requested:\***

Data Collected as part of Needs & Asset Reports

- Name of data fields: Health; Family Support, Coordination; Early Learning
- Which agency data—DHS, IHS
- Current vs. historical data—Report Cycle

---

---

---

---

---

---

---

---

*Example: Oral health data collected from IHS for 2012; WIC data from ITCA for 2014.*

Data Collected on School Readiness Indicators

- Name of the school readiness indicator(s)
- Year of data collection

---

---

---

---

---

---

Other Data — please specify

---

---

---

---

---

---

*Example: Quality First Rating and Enrollment data; First Things First Quality First Child Care Scholarships data for SFY 2014*

The requestor must specify data they are requesting. First Things First Tribal Affairs and/or Research and Evaluation staff may contact the requestor to clarify the request. Any changes to the request based on this contact will be documented in follow-up correspondence with the requestor.

**Data Recipient:**

The data requested above will be directly submitted to:

Name of Designated Person:  
Title/Affiliation:  
Address:  
Phone/Email:

First Things First will not provide data while collection, quality assurance and analysis activities are taking place. Only final data that has been reviewed for accuracy and integrity will be shared with the designated person of contact in the agreed upon format.

**Please fill out the form and send it to:**

First Things First  
ATTN: Tribal Affairs  
4000 North Central Avenue, Suite 800  
Phoenix, AZ 85012

For questions regarding this form (or to submit the request electronically), please contact:  
[iperez@azftf.gov](mailto:iperez@azftf.gov)