The SHOSHONE-BANNOCK TRIBES

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June 8, 2018

Ms. Kathleen McHugh, Director
Policy Division
Administration for Children and Families
United States Department of Health and Human Services
330 C Street, SW
Washington, DC 20024

Via Electronic Mail: CBComments@acf.hhs.gov

Re: RIN: 0970-AC72 Adoption and Foster Care Analysis and Reporting System; Advance Notice of Proposed Rulemaking (3/15/2018)

Dear Director McHugh,

The health and wellbeing of our people is one of the highest priorities for the Shoshone-Bannock Tribes (Tribes). The Tribes have reserved rights as set forth in the Fort Bridger Treaty of July 3, 1868, between the Shoshone-Bannock Tribes and the United States government. One of our foremost Tribal missions is to promote the physical and emotional wellness of Indian children and their families in our tribal community. It is encouraging to see federal agencies upholding their trust responsibilities for the health, welfare, and safety of our Tribal people, through development of federal laws and regulations, including the Indian Child Welfare Act (ICWA) data collection requirements that are the subject of these comments. The Tribes continue to work on behalf of our most vulnerable community members - our children and their families. Therefore, the Tribes respectfully request your support in upholding the trust responsibilities and treaty obligations for the protection of our children and our future by supporting the retained inclusion of the ICWA-related data points that the Administration for Children and Families (ACF) incorporated into the Final Rule, dated December 14, 2016 (Final Rule).

Since 1993, when AFCARS was established, it has been amended several times to incorporate additional data elements in order to get a better picture of state child welfare systems and increase compliance by analyzing such data. The AFCARS has evolved to capture data regarding sibling connections, sexual abuse, use of psychotropic medications, and more. The AFCARS will, rightfully, continue to grow and evolve to serve the best interest of all children in

state care, including Indian children. The 'best interest' standard is a dynamic standard, as it is neither static nor stagnant. The AFCARS must also evolve to address that best interest standard. Collection of ICWA data elements in the AFCARS is a continued step in the right direction for Indian children, their families, and their tribes.

The Shoshone-Bannock Tribes appreciates this opportunity to comment on the Advanced Notice of Proposed Rulemaking (ANPRM) regarding the Adoption and Foster Care Analysis Reporting System (AFCARS) for Title IV-B and Title IV-E as they relate to the Indian Child Welfare Act of 1978. These regulations are necessary to realize the purpose and intent of the ICWA – to protect the best interests of Indian children and to promote the stability and security of Indian tribes and families.

General Comments of the Tribes:

The lack of Tribal consultation prior to this ANPRM is concerning.

As the ACF is well aware, in enacting the ICWA, Congress found "there is no resource that is more vital to the continued existence and integrity of Indian tribes than their children and that *the United States has a direct interest, as trustee, in protecting Indian children...*" 25 U.S.C. §1901 (3)(emphasis added). The Tribes place a high value on our children and when federal policies are developed that may impact our children, we expect full tribal consultation to occur. We are concerned about the lack of Tribal consultation prior to issuance of this ANPRM.

It is the Tribes' understanding that the OMB has approved a two-year delay in implementing the new AFCARS regulations and is moving forward with this ANPRM to seek comments on 'streamlining' the 2016 AFCARS regulations. The Tribes are concerned that no consultation with tribes was sought prior to the development of these rules and the decision to delay AFCARS implementation for five years, until 2021. Although the ACF feels increasing the number of data requirements for states is unreasonable, the Tribes' concern is that Indian children continue to be overrepresented in 14 states' foster care systems, sometimes at rates more than 10 times their per capita population. Without data, there can be no accountability or improvements, which is what we have seen since AFCARS came into being in 1993.

The data collection requirements of the Final Rule are consistent with ACF's statutory mission.

Several Sections of the Social Security Act address the collection of information on children in state care and penalties for non-compliance, including:

1. Section 479 [42 U.S.C. § 679], which mandates Health and Human Services (HHS) collect national, uniform, and reliable information on children in state care; and
2. Section 474(f) [42 U.S.C. § 674(f)], which requires HHS to impose penalties for non-compliant AFCARS data; and

3. Section 1102 [42 U.S.C. § 1302], which instructs the Secretary to promulgate regulations necessary for the effective administration of the functions for which HHS is responsible under the Social Security Act.

The Final Rule, which ACF promulgated pursuant to these statutory requirements, ensures the collection of necessary and comprehensive national data on the status of Indian children for whom ICWA applies and historical data on children in foster care. Thus, the Final Rule's data collection elements are necessary to ACF's statutory mission under Section 479 of the Social Security Act. The Tribes support the data collection requirements in the Final Rule.

The administration provided all interested parties with ample notice and opportunities to comment on the Final Rule.

Tribes, tribal organizations, and tribal advocates have long sought the inclusion of ICWA-related data points in the AFCARS. The initial rules were changed due to comments by these entities and others after reviewing the ACF's February 9, 2015 proposed rule. On April 2, 2015, the ACF issued a Supplemental Notice of Proposed Rulemaking (SNPRM) changing certain data elements. Yet another SNPRM was issued on April 7, 2016. Specifically, the ACF sought comments on the inclusion of the ICWA data points in both the April 2015 Intent to Publish a SNPRM, as well as the April 2016 SNPRM. Ultimately, the Final Rule was published on December 14, 2016, and included the ICWA data elements.

The Final Rule thoroughly responded to comments on both the benefits and burdens of the proposed regulatory action. *Given the multiple opportunities to comment throughout this time period, any additional collection action is unnecessary.* In addition, tribes, tribal organizations, and advocates received notice of all of these opportunities, and with ample time to comment on this vital and important rule change. In fact, the Tribes provided comments in response to the SNPRM on May 9, 2016. *See* attached comments.

States also had many opportunities to participate. As the Final Rule explains in detail, ACF engaged in robust consultation with states and responded to their concerns, for example, by streamlining many data elements. 81 Fed. Reg. 90524, 90565-66. *States had at least six different opportunities to raise their concerns, which the ACF considered and addressed fully.* 81 Fed. Reg. at 90566.

The Tribes does not think it is unreasonable to ask states, the vast majority of which did not express any significant or specific concerns during the rulemaking process, to provide basic and important information to help tribes, states, and the federal government improve outcomes for Indian children. If there is some additional technical assistance or assistance that states need, we would support that and understand that members of Congress who are following this have even

proposed enhancing the federal match rate for states while they are improving their data systems, as was done in 1993 when AFCARS was first implemented.

States are already in the process of implementing these changes.

Since these regulations have been effective for approximately fifteen months, all states should be in the process of implementing them. The Tribes are aware, for example, that California, a state with 109 federally recognized tribes, is already well under way with its implementation efforts, having relied on the Final Rule. At this stage, any modification of the data collection requirements would be a waste of finite state child welfare resources, which itself is an additional burden.

These regulations are important to Indian children and their tribes and will help ensure compliance with the ICWA.

Nothing has changed since ACF made clear in the Final Rule that data collection is necessary to protect Indian children, their families, and their tribes. There remains a pressing need for comprehensive national data on ICWA implementation and there have been no change in circumstances that would alter the burdens or benefits of the Final Rule's data collection requirements.

The data elements incorporated into the Final Rule include data that is readily available through the case files of Title IV-E managing agencies. This includes common case management data that details the activities of the Title IV-E agency and related activities of the court in certain child welfare cases.

The collection of ICWA-related data will follow a very similar framework and use similar sources of data that have been part of AFCARS requirements for many years.

The regulations themselves—in response to the comments from stakeholders across the country—describe the importance of these changes. As stated in the December 2016 Final Rule, 81 Fed. Reg. 90524, 90527:

> Overall, tribes, organizations, states, and private citizens supported our mission to collect additional information related to Indian children as defined in ICWA. Moreover, some states, tribes, national organizations, and federal agencies have stated that ICWA is the "gold standard" of child welfare practice and its implementation and associated data collection will likely help to inform efforts to improve outcomes for all children and families in state child welfare systems....
>
> Overall, tribal commenters and national child welfare advocacy organizations believe that collecting ICWA-related data in AFCARS is a step in the right

> direction to ensure that Indian families will be kept together when possible, and will help prevent AI/AN children from entering the foster care system. Many of the tribal commenters that supported the 2016 SNPRM also recommended extensive training for title IV–E agencies and court personnel in order to ensure accurate and reliable data.

Other federal reports have demonstrated the need for quality national data to assess states' efforts in implementing ICWA. *See* Government Accountability Office, Indian Child Welfare Act: Existing Information on Implementation Issues Could be Used to Target Guidance and Assistance to States, GAO-05-290 (Apr. 4, 2005) http://www.gao.gov/products/GAO-05-290 (last visited June 7, 2018).

Tribes have relied on the Final Rule.

Tribes have long sought data points regarding the implementation of ICWA. This has included advocacy on local, state, and federal levels. With the promulgation of the Final Rule in December of 2016, tribes largely ceased advocacy efforts to mandate data collection, instead refocusing tribal resources toward working collaboratively with their governmental partners to implement the data elements listed in the Final Rule. To this end, some tribes have worked to develop and update agreements to reflect the data elements in the Final Rule and the 2016 BIA ICWA Regulations, as a goal of both is to increase uniformity.

The ANPRM is arbitrary and capricious where it seeks only information on burdens.

This ANPRM arbitrarily focuses on collecting information about the burdens without considering the benefits. As required by law, the Final Rule conducted a careful analysis of the benefits and burdens, and appropriately amended the proposed rule to achieve a balanced Final Rule.

The ACF "determined in the final rule that the benefits outweigh the burden associated with collecting and reporting the additional data." 81 Fed. Reg. at 90528. The ACF explained how its weighing of the benefits and burdens led it to make certain changes to its proposal. For example, as stated in the Final Rule at 81 Fed Reg. 90528:

> In response to state and tribal comments suggesting congruence with the BIA's final rule, we revised data elements in this final rule as appropriate to reflect the BIA's regulations including removing requirements that state title IV–E agencies report certain information only from ICWA-specific court orders. These changes should allow the state title IV–E agency more flexibility, alleviate some of the burden and other concerns identified by states, help target technical assistance to

increase state title IV–E agency communication and coordination with courts, and improve practice and national data on all children who are in foster care.

There have been no material changes in circumstances justifying the ACF's new approach. The executive order is not a sufficient basis for the ACF to act, as the executive order itself is arbitrary and unlawful where it provides an insufficient basis for reasonable decision-making relaying solely on an examination the burden of regulations without the required balancing of benefits. Additionally, the executive orders to fail to provide justification to deviate from the statutory requirement for regulations.

Specific Responses to the Questions for Comment Provided in the ANPRM:

1. Identify the data elements, non-ICWA-related, that are overly burdensome for state and tribal title IV-E agencies and explain why. Please be specific in identifying the data elements and provide a rationale for why collecting and reporting this information is overly burdensome.

The Tribes cannot identify any overly burdensome tasks. All the data elements are necessary.

2. Previously, we received comments regarding burden and the system changes needed to report the ICWA-related data elements of the 2016 SNPRM. We would like to receive more detailed comments on the specific limitations we should be aware of that states will encounter in reporting the ICWA-related data elements in the final rule. Please be specific in identifying the data elements and provide a rationale for why this information is overly burdensome.

The ANPRM requests IV-E states and tribes to provide the number of children in foster care who are considered Indian children as defined in ICWA. However, it is specifically due to the previous lack of a national data-reporting requirement, that any number provided in response to this question will likely be significantly inaccurate. This speaks to the critical importance of the ICWA-related data points – without a data-reporting requirement, many states simply do not appropriately track Indian children in their child welfare systems, let alone the individual ICWA-related data points. The Tribes cannot identity any overly burdensome tasks for reporting of the data elements.

3. Previously, we received comments that particular data elements did not lend themselves to national statistics and were best assessed with qualitative methods such as case review. Please provide specific recommendations on which data elements in the regulation to retain that are important to understanding and assessing the foster care population at the national level. Also, provide a rationale for your suggestion that may include its relevance to monitor compliance

with the title IV-B and IV-E programs or another strong justification for using the data at the national level.

As discussed above, there has been ample opportunity for comment and this additional ANPRM is itself both unlawful, as crafted, and is a waste of finite resources. Tribes and states properly relied on the Final Rule in working toward implementation for nearly a year and a half. Any modification to the existing data points frustrate those efforts, would require states to begin again, including collaborating with their tribal partners, and ultimately further delay implementation. This comes at the expense of the health, safety, and welfare of not only Indian children, their families, and their tribes, but also the child welfare system at large, where a modification of the Final Rule would cost system-wide resources.

Furthermore, the ICWA, enacted November 8, 1978, is a federal law that the U.S. Congress enacted to address the best interests and welfare of Indian children at the national level. The ICWA is rapidly approaching its 40-year anniversary, however there is not a single state that has fully implemented or complied with the provisions of that law. National statistics and data elements directly tied to ICWA compliance are absolutely essential to continue moving toward conformity with the federal law.

4. Previously we received comments noting concerns with variability in some of the data elements across states and within jurisdictions. Please provide specific suggestions to simplify data elements to facilitate the consistent collection and reporting of AFCARS data. Also, provide a rationale for each suggestion and how the simplification would still yield pertinent data.

In the absence of a national data-reporting requirement, it is guaranteed there will be variability with data elements, which frustrates a stated purpose of the 2016 BIA ICWA Regulations, to establish uniformity of application throughout the nation. The need to eliminate the data variability is precisely why it is important to have a national data collection standard. It will assist HHS/ACF efforts to support states in properly implementing ICWA by having targeted, data-driven identified areas where states need support the most.

5. Previously we received comments questioning the utility, reliability, and purpose of certain data elements at the national level. Provide specific recommendations on which data elements in the regulation to remove because they would not yield reliable national information about children involved with the child welfare system or are not needed for monitoring the title IV-B and IV-E programs. Please be specific in identifying the data elements and provide a rationale for why this information would not be reliable or is not necessary.

Each of the ICWA-related data points are specifically tied to existing federal laws and regulations and are necessary to monitor and support title IV-B and IV-E programs. Each of the ICWA-related data points are critical.

Further, as discussed above, ICWA is the "gold standard" of child welfare and ensuring compliance with this federal law informs how the existing child welfare system may improve in whole. The Tribes agree with the intent of the federal law, and urges immediate implementation of the reporting requirements.

Conclusion:

For the foregoing reasons, the Tribes strongly support each of the ICWA-related data points as set forth in the Final Rule and believe, as the ACF did in publishing the Final Rule, the benefits of this data collection outweighs any perceived burden.

In closing, the Indian Child Welfare Act is widely considered the "gold standard" of child welfare, and a refinement of family reunification objectives mandated by nearly every state. Any hindrance or stoppage of ICWA data point collection significantly affects tribal children, families, and state agencies trying to comply. In the interest of protecting the Tribes' most valuable and vulnerable asset, our children and their families, the Tribes respectfully submits these comments and urges ACF to expedite the implementation of the reporting requirements.

Sincerely,

Nathan Small

Nathan Small
Chairman, Fort Hall Business Council
Shoshone-Bannock Tribes

The SHOSHONE-BANNOCK TRIBES

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May 9, 2016

Ms. Kathleen McHugh, Director
Policy Division
Administration for Children and Families
United States Department of Health and Human Services
330 C Street, SW
Washington, DC 20024

Re: Supplemental Notice of Public Rulemaking – Proposed AFCARS data elements related to the Indian Child Welfare Act of 1978 –RIN 0970-AC47 – Federal Register (April 7, 2016)

Dear Ms. McHugh,

The Shoshone-Bannock Tribes appreciates this opportunity to comment on the Supplemental Notice of Public Rulemaking (SNPRM) regarding the proposed Adoption and Foster Care Automated Reporting System (AFCARS) data elements related to the Indian Child Welfare Act of 1978 (ICWA). These regulations are necessary to realize the purpose and intent of ICWA – to protect the best interests of American Indian and Alaska Native (AI/AN) children and to promote the stability and security of tribes and families.

The unique legal status of AI/AN children and the corresponding safeguards provided under federal laws, like ICWA, are not addressed in current federal reporting requirements for state child welfare systems that serve AI/AN children and families. Lacking adequate data elements, states and child welfare agencies struggle to address the disproportionate number of AI/AN children in state child welfare systems. As a result, the purpose and intent of ICWA remains unfulfilled. The AFCARS data elements proposed in the SNPRM fill this void.

Providing uniform federal data collection regulations enables states and child welfare agencies to identify the best approach to protect the best interests of AI/AN children and to promote the stability and security of tribes and families. Tribes also benefit from access to this data because it allows them to track the progress of their tribal children and families in state child welfare systems. In addition, by collecting and analyzing this data, states and tribes can forge a stronger partnership to realize the purpose and intent of ICWA. Considering AI/AN children are at least two times more

likely than any other group to enter state child welfare systems, the time to adopt uniform federal data collection regulations is now.

The uniform federal data collection regulations provide detailed information on ICWA implementation. They include a series of data elements tied to ICWA requirements that will allow tribes, states, and federal agencies to develop a more detailed understanding of the trends in out-of-home placement and barriers to permanency for AI/AN children. Access to this data will develop better policy, technical assistance, training, and resource allocation. Collecting the data proposed in the SNPRM will provide AI/AN children the same opportunities that other children currently have, and will better inform responses that address the unique issues in both policy and practice.

The proposed data elements in the SNPRM include data that is readily available through the case files of Title IV-E managing agencies. This includes common case management data that details the activities of the Title IV-E agency and related activities of the court in certain child welfare cases. The full AFCARS NPRM, like the SNPRM, also proposes data from Title IV-E agencies and courts. Existing AFCARS data elements that are similar include:

1. Transfer to Another Agency (1355.43(g)(4));
2. Living Arrangement and Provider information (1355.43(e)(1-16);
3. Authority for Placement and Care court order (1355.43(d)(4));
4. Termination of Parental Rights date (1355.43(c)(3)(ii)); and
5. Date of Judicial Finding of Abuse or Neglect date (1355.43(c)(4).

The collection of ICWA-related data will follow a very similar framework and use similar sources of data that have been part of AFCARS requirements for many years.

Title IV-E of the Social Security Act provides authority for the Secretary of the Department of Health and Human Services (DHHS) to regulate the collection and reporting of data regarding children who are in the care of a Title IV-E agency. DHHS recently interpreted this Act to include the *collection and reporting of data related to implementation of ICWA involving AI/AN children in state child welfare systems*. We are pleased to see the current Administration adopt this common sense clarification of current authority.

Specific Comments on SNPRM:

Identifying an "Indian Child" under ICWA – The data elements proposed under this category provide information about efforts and sources to identify an Indian child. While asking the birth or adoptive mother and father and/or Indian custodian are good sources, it would also be highly beneficial to include whether extended family members have been questioned as well, since many times they will have critical information that a particular birth parent may not. This also fits well with Title IV-E requirements to notice all adult relatives when a child in their family has been removed (42 U.S.C. 671(29)).

We would also suggest improving the language regarding whether a child is domiciled or resident on an Indian reservation to "on an Indian reservation or in a predominately Indian community."

This tracks the language in the revised federal guidelines that is intended to address whether a state agency or court has a reason to believe a child is an Indian child for ICWA purposes, not to address jurisdictional issues. In addition, adding the recommended language is in alignment with recognizes that many tribal members live off tribal lands in nearby areas, especially in Public Law 280 states (i.e., California), where tribal lands can be much smaller in size.

Transfer to tribal court – These data elements capture the request from eligible parties to transfer jurisdiction from state to tribal court. The data is critical to understanding changes in the case that can impact future agency and court decisions. We would recommend that one additional data element be included that provides a date on when the transfer of jurisdiction petition was approved.

Notification – The data elements under this category follow the ICWA requirements, but it needs to be pointed out that when asking state agencies to self-report "whether the Indian child's tribe (if known) was given proper legal notice of the child custody proceedings more than 10 days prior to the first child custody proceeding," the reported information may not be reliable or accurately reported. On at least one occasion in a California ICWA proceeding, county counsel interpreted the following provision of the California Welfare and Institutions Code, Section 224.2(b) to relieve the agency from providing any written notice to the Shoshone-Bannock Tribes, as we had verbally confirmed the child's member status:

> Notice shall be sent whenever it is known or there is reason to know that an Indian child is involved, and for every hearing thereafter, including, but not limited to, the hearing at which a final adoption order is to be granted, unless it is determined that the Indian Child Welfare Act (25 U.S.C. Sec. 1901 et seq.) does not apply to the case in accordance with Section 224.3. After a tribe acknowledges that the child is a member or eligible for membership in that tribe, or after a tribe intervenes in a proceeding, the information set out in subparagraphs (C), (D), (E), and (G) of paragraph (5) of subdivision (a) need not be included with the notice.

It should be noted in the data elements that the responses are sought in regard to the federal ICWA provisions, notwithstanding any state law to the contrary.

Active efforts to prevent removal and reunify with Indian family – The data elements under this category provide important information that impacts the ability to prevent removal in the first place and help reunify after removal. These are tied to the efforts by the state agency and court in these areas. While the data elements track many of the federal guidelines, there are some important missing elements that characterize active efforts and support our recommendations. First, we recommend adding language to the third bulleted data element "Invite representatives of the Indian child's tribe to participate in the proceedings." We recommend adding language so it will read, "~~Invite~~ **Engage** representatives of the Indian child's tribe to participate in the **legal** proceedings **and planning for and providing rehabilitative services to the child's family**."

ICWA and the accompanying federal guidelines direct state agencies to make active efforts that are appropriate to the Indian child and family's unique needs. Under A.2 of the revised federal guidelines the language specifies active efforts as "Taking into account the Indian child's tribe's prevailing social and cultural conditions and way of life, and requesting the assistance of

representatives designated by the Indian child's tribe with substantial knowledge of the prevailing social and cultural standards;." We recommend that the first bullet under this category be amended to include this language so it would read "Identify appropriate services to help the parent that take into account the Indian child's tribe's prevailing social and cultural conditions and way of life, and request the assistance of the representatives designated by the Indian child's tribe."

Removals – The data elements in this category follow the ICWA requirements for involuntary placements, but do not address ICWA requirements for voluntary placements. These include parental consent provisions regarding voluntary foster care placement that are not addressed elsewhere in the SNPRM or the full AFCARS NPRM section which addresses voluntary placements. Since the voluntary consent requirements of ICWA are the same for foster care as they are for termination of parental rights (25 U.S.C. 1913(a), we recommend that the three SNPRM data elements addressing voluntary consent in the termination of parental rights category be added to the removal category with language adjusted to reflect consent to a voluntary foster care placement (see 1355.43(i)(22), 1355.43(i)(23), and 1355.43(i)(24)). We also recommend adding a data element that addresses the ICWA requirement regarding the return of the child to the birth parents if consent is withdrawn (25 U.S.C. 1913(b)).

Foster care and pre-adoptive placement preferences – These data elements specify information related to two of the three types of placements that are covered under the ICWA placement preferences for foster care and pre-adoptive placements (25 U.S.C. 1915(b)). ICWA defines foster care placement to include foster care, guardian or conservator, or institutional placement (25 U.S.C. 1903(1)(i)). While the full AFCARS NPRM provides data elements that address guardianships more generally, these data elements do not cover the placement preferences included under ICWA fully. For example, the AFCARS NPRM provides data elements that can identify relative and non-relative guardianship homes, but there are no data elements that can identify whether the guardian home was a tribally licensed or approved home or another Indian family guardian home licensed by the state. Our recommendation is to add clarifying language to the SNPRM in this section as follows:

> "Indicate which foster care or pre-adoptive placements that meet the placement preferences of ICWA in 25 U.S.C. 1915(b) were available to accept placement. "Foster Care Placement" is defined under ICWA as a "...temporary placement in a foster home or institution or the home of a guardian or conservator..." (25 U.S.C. 1903(1)(i))."

Termination of parental rights – The data elements in this category create data elements that track ICWA requirements regarding involuntary and voluntary termination of parental rights. Three of the four ICWA requirements are addressed in the data elements (evidentiary standard—beyond a reasonable doubt, expert witness testimony, and continued custody resulting in serious damage). However, arguably one of the most important requirements to avoid termination of parental rights, provision of active efforts, is not included. This is important because the first determination of active efforts in a removal can occur within the first few months of a case being opened, while the termination of parental rights hearing can occur several months or even a year or more later from the first active efforts determination. We recommend adding a data element that asks if the court made a determination, in a court order that active efforts had been made by the Title IV-E agency.

We thank DHHS for its efforts to fill the voids in federal data collection concerning AI/AN children and families and express our support for the establishment of the proposed data elements contained in the SNPRM. Nearly forty years after Congress enacted ICWA, substantial issues remain regarding the disproportionate number of AI/AN children in state child welfare systems. The proposed AFCARS in the SNPRM represent a strong commitment to address this disproportionality and realize the purpose and intent of ICWA. We look forward to working with DHHS in the future on how to best use the new data proposed in this SNPRM.

Sincerely,

Blaine J. Edmo
Chairman, Fort Hall Business Council
Shoshone-Bannock Tribes