

Impact of the 1978 Indian Child Welfare Act and the 1980 Adoption Assistance and Child Welfare Act on the Out of Home Placement of American Indian Children

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Out of home placement has been a problem for children from many social and ethnic backgrounds but its impact on American Indian and Alaskan Native children has been identified as particularly detrimental. The Indian Child Welfare Act of 1978, P.L. 95-608, was passed to correct the problem while the Adoption Assistance and Child Welfare Act of 1980, P.L. 96-272, strengthened and improved the entire child welfare system, thereby benefitting Indian children.

Assessing the impact of these two laws on Indian children is difficult because systematic comprehensive information is not collected at the Federal level. The State reporting system on foster care and adoption began in 1982, and is voluntary both as to participation and information reported. The Bureau of Indian Affairs has data based on numbers of children paid for in out of home care, which is reported by administrative area, not by State. The Bureau also has annual reports on the number of Indian children in boarding schools or dormitories.

Adoption data is even more fragmentary. The Indian Child Welfare Act requires Tribes and States to report to the Secretary of Interior any child who is placed in adoption "in accordance with the

Act". While it is generally believed that this means the children are placed in adoptive homes with Native American parents, in fact the Act allows for a range of outcomes and a number reported without some accompanying information is ambiguous information at best.

This report is a compilation of such data as are available on the trends in out of home placement of American Indian and Alaskan Native children from 1974 through 1984-85, in an attempt to identify trends over this time period.

States reporting few or no Indian children may consider that they are not an important category. In all but a few States Indian children are a very small proportion of the child care population. Pennsylvania for instance reported nine children in the 1980 OCR survey and has not identified any in either the 1982 or 1984 Voluntary Cooperative Information System reports. It is interesting that a survey of counties conducted by the Council of Three Rivers American Indian Center, Pittsburgh,^{1/} reported that 32 counties in the State were providing foster care services to a total of 127 American Indian children as of December 1985. The Council "is aware of 72 Indian children in foster care" in the State of January 1987. While it is likely that many of these children are not enrolled as tribal members and their relationship to any tribe may be tenuous, still county level officials were in some way able to assign this identity to them when directly queried.

I. Foster Care Placements of Indian Children

A. In July, 1976 the Association of American Indian Affairs,^{2/} (AAIA) at the request of the American Indian Policy Review Commission of the U.S. Congress, conducted a nation wide statistical survey of the status of Indian children in out of home care and in boarding schools. The survey was restricted to 19 States, those with high Indian population or with known problems such as Maine.

In these States, they identified the number of Indian children in foster care, and who had been adopted, and calculated rates of placement based on the 1970 census data of Indian and Alaskan Native population under age 21. They also inquired as to the proportion of children in each category who were placed with non Indian parents. In most cases this latter information was not available, but when it was, as in Maine, New York and Utah, it was high, that is 64%, 97% and 88% respectively of the Indian children in those States were placed in foster care or adoption in non-Indian homes.

The report also attempted to make comparisons between the proportion of Indian and non-Indian children placed. These comparisons indicated that sometimes extraordinarily high proportions of Indian Children were placed as compared to

other children in the State e.g., Wisconsin was estimated to alienate Indian children 1,560% more, California 610%, Utah 500%, than they did children of other races.

The third column of Table 1 records the AAIA data for foster placement in the 19 States surveyed. Their total 6650, must be regarded as an underestimate since it does not include all of the States and since also, in some instances States were not able to provide information. AAIA did, however, include a count of children in BIA foster care.

B. In 1976, Children's Bureau, HEW, issued an extensive report on Indian Child Welfare: The State of the Field^{3/}. This study carried out under contract by the University of Denver, Center for Social Research, was an extensive investigation into legal and jurisdictional issues, the policies and activities of the major service providers including State child welfare agencies and institutions, BIA social services and boarding schools, Indian Health Service and private agencies. The report attempted to evaluate services as perceived by the providers and by samples of Indian persons in both urban and reservation areas, and made an evaluation of the volume and impact of foster care and adoptive placement. The researchers were not successful in getting a response from the States sufficient for an estimate of total foster care placement. Comparative figures for foster placement were available from only 10 States as listed in column II of Table 1. This information,

mostly from 1974, certainly supported the AAIA contention that Indian children were being placed disproportionately, and that services were inadequate or unavailable. Both studies also emphasized the fact that Indian parents were not informed of their rights, received few, if any services, and were not represented by attorneys at termination procedures.

These two studies, plus the advocacy of a number of national Indian organizations, the Children's Bureau and the Bureau of Indian Affairs were a significant support for passage of the 1978 Indian Child Welfare Act.

C. The Indian Child Welfare Act (P.L 95-608, ICWA) required notification of tribes as well as parents, when children were at risk of placement, transferred jurisdiction to Indian tribal courts when possible, and required a judicial finding that active efforts had been made to assist the family before a child could be removed. Both the Bureau of Indian Affairs and the Children's Bureau made active efforts, funding training and other activities to insure that tribal and State agencies were informed as to the provisions of this law. The BIA annually funded the development of child welfare and family service programs -- \$5.5 million from 1980 thru 1984, \$8.7 million in 1985, but reduced to under \$4 million in 1986. These funds were awarded competitively to Tribal organizations and urban Indian centers. Most groups have argued that these funds

are not sufficient to meet the needs of providing necessary services to Indian families. (Information from BIA Social Services.)

- D. One other study conducted by the Children's Bureau provides an estimate of the numbers of Indian children in care nationally prior to the implementation of P.L. 95-608. A 1977 sample survey study conducted by Westat , Inc.,^{4/} found that only about 1% of the children receiving services nationally from State social services agencies were Indian or Native Alaska children, and estimated that a total of about 5,600 such children were in out of home care. Since this was a national survey there are no estimates at a State level and BIA is not included.

While these estimate was not considered very reliable by the Westat researchers or the Children's Bureau, nevertheless it is quite close to the 1980 Office of Civil Rights count of 5475 which is based on enumeration in each county.

- E. In 1980, the Office of Civil Rights^{5/} requested States and counties to make an accounting of all children in care, their race or ethnicity, whether voluntary or court ordered, the type of placement, and the number of months in care. The inquiry was limited to social services and thus did not include children in corrections or the mental health system nor those under the care of BIA.

In spite of these obvious shortcomings, it remains our only comprehensive count of children in out of home care up to the present time and is a baseline for the probable number of American Indian and Alaskan Native children in care of State social services. The differences between this count and the 1978 AAIA total may be due to the numbers under care of BIA.

F. In 1980, Congress passed the Adoption Assistance and Child Welfare Act, (P.L. 96-272), to promote systematic attention to permanency planning for all children in care. All children in care must have a case plan, with specific goals. Parents must be notified and have the right to be present at each required six month case review, should be involved in the development of the case plan, are encouraged to visit with children in care, etc. After October 1, 1983, courts were also required to review whether reasonable efforts had been made to prevent the need for placement, consistent with the safety of the child, before the child could be placed in foster care.

The new law did not cite the Indian Child Welfare Act but has generally been interpreted as being consistent with it in its major provisions. P.L. 96-272 requires preferential placement with relatives, if possible, and if not, then in the least restrictive environment consistent with the child's needs. This is generally interpreted to mean of the

same ethnic background and accessible to parental visits. There is, however, no requirement to notify tribal authorities.

P.L. 96-272 was implemented with some difficulty since it coincided with the change to block grants and some reductions in funding. However, since 1977, there had been active dissemination of all of the elements related to permanency planning, case review systems, case planning approaches and management information systems, and most States moved to implement these approaches.

G. In 1981, the Assistant Secretary for Human Services recommended that in order to reduce the reporting burden for States, the reporting of foster care and adoption statistics should be voluntary for the State, and could be provided in whatever format the State wished. Beginning in 1982, the American Public Welfare Association collected and collated these reports and submitted them to HDS, where staff subsequently refined the data and conducted some analysis. This paper uses reported data from APWA on the number of placements of Indian and Alaskan Native children for 1982^{6/} and 1984^{7/}.

In 1982, 37 States reported a total of 3,985 Indian children in care. Massachusetts, New Jersey, New York, Delaware, District of Columbia, Pennsylvania, Georgia, Kentucky,

Indiana, Ohio, Iowa, Hawaii, Alaska and Idaho did not report. (See Column V, Table 1)

While some of these States no doubt had very few Indian children, the lack of data from Massachusetts, New York, Iowa, Arkansas and Idaho is dismaying since they reported a total of 776 Indian children in 1980. However, the reporting States for the most part reported significantly reduced numbers as compared to 1980. Maine showed a reduction from 61 to 38, North Carolina, from 238 to 118, Minnesota from 708 to 622, New Mexico from 135 to 73, Arizona from 184 to 83, California from 447 to 378, Oregon from 202 to 114. There were some high placement States such as Wisconsin, Oklahoma, Nebraska, South Dakota and Montana where placements remained high, and Washington and North Dakota reported increases in numbers of Indian children in placement. If the 1980 value is substituted for all of the non reporting States in 1982, the estimated total placement would increase by 855 to 4840, which is a probable decrease of at least 1,500 children from the 1980 baseline.

This picture changes somewhat when we consider BIA placement. We were not able to get a count by States for 1982, but the BIA made such a count in 1983,^{8/} which seems usable in this context. (The BIA foster care program is defined as residual, that is, they pay when no other funding is available. A few western States, and Mississippi in the east, have historically insisted that they have no funds for

Indian children, and the BIA social services program has met this need). A comparison with the State figures indicates that in some instances a decrease in State placement is apparently a transfer of children to BIA placement. Addition of the two figures give totals very close to the AAIA 1976 total as in Montana, North Dakota, South Dakota and Arizona. If the BIA total for 1983 is added to the estimated State total for 1982 (1714 and 4840) the number of Indian children in care in 1982-83 is an estimated 6554. This is probably a reduction from 1976 since that study included only 19 States. As an early estimate of the impact of the two laws this total can at best be described as promising.

I. The most recent VCIS report is 1984 data,^{7/} and the reporting of Indian and Alaskan Native children is even more reduced than in 1982. Only 27 States reported any such children in care. HDS Regional Offices were requested to call those States having significant numbers in 1980. All States contacted except New Mexico were able to supply the information. These figures are show in parentheses in the table under VCIS-1984. Corrected figures were provided for California and Washington, and Alaska was called an estimate. Including these figures provides an estimated total of 5,110 children in State placement in 1984. This estimate is low since there are no figures for 14 States. Overall child placement rates have increased from 262,000 in 1982 to 287,756 in 1984 an increase of almost 10% for all

children nationally. The estimated increase of Indian and Alaskan Native children in State care, from 4840 in 1982 to 5110 in 1984 is 5.6%.

Similarly, the BIA placement has increased from 1714 in 1983 to 2127 in 1985, a 24% increase over 1983. The combined State and BIA total for 1984-85 is 7237, which seems very similar to the 1976 count of 6650 for 19 States. This is dismaying since it appears that neither ICWA nor P.L. 96-272 are having any continuing impact.

In addition, a study of the table suggests the possibility that children are just being transferred from one source of funding to another. In Maine, the 82 children in State care in 1976 was gradually reduced to 15 in 1984. But in 1985, the BIA is paying for 50 children in care now being placed by Tribal Child Welfare programs. Presumably they are in Indian foster homes. But why are these children not eligible for Federal funding under Title IV-E? Is this an appropriate role for BIA? What is the Federal and State policy? A similar shift may be occurring in New Mexico, Montana and North Dakota although the BIA has had a continuing role in those States. No information is available from any source on the number of Indian children in non-Indian foster homes.

	I Indian Children <18-1980	II Denver Univ. Survey 1974	III AAIA 1976	IV OCR 1980	V VCIS 1982	VI BIA 1983	VII VCIS 1984	VIII BIA 1985
TOTALS	551,368	N.A.	6650	5475	3985	1714	5110	2127
REGION I								
Connecticut	1371			9	13		11	
Maine	1713		82	61	38		15	50
Massachusetts	2451			57	—		(23)	
New Hampshire	406			3	0		—	
Rhode Island	1059			0	6		—	
Vermont	337			3	9		12	
REGION II								
New Jersey	2440			3	—		—	
New York	13334		142	103	—		(49)	
REGION III								
Delaware	346			0	—		1	
Dist. of Columbia	207			2	—		—	
Maryland	2613			16	37		9	
Pennsylvania	2862			9	—		—	
Virginia	2492			7	3		—	
West Virginia	415			1	2		0	
REGION IV								
Alabama	2606			11	1		6	
Florida	5416			23	—		—	10
Georgia	2161			7	11		—	
Kentucky	992			0	—		2	
Mississippi	2523			21	3	108	6	113
North Carolina	25067			238	118	11	—	36
South Carolina	1988			58	0		—	
Tennessee	1329			1	0		2	
REGION V								
Illinois	5300	81		67	57		(89)	
Indiana	2453			19	—		6	
Michigan	15994		82	119	71		(72)	
Minnesota	15633	618	737	708	622	14	536	24
Ohio	3702			22	—		—	
Wisconsin	12617	173	545	243	238	10	247	14
REGION VI								
Arkansas	2967			6	6		(14)	
Louisiana	4564			9	18		8	
New Mexico	47339		287	135	73	145	—	355
Oklahoma	66063	300	337	258	257	10	(230)	11
Texas	11733			26	38		29	
REGION VII								
Iowa	2255			43	—		36	
Kansas	5271			38	36		46	
Missouri	3662			18	7		5	
Nebraska	4109			156	147		81	3
REGION VIII								
Colorado	6426			84	40	96	80	84
Montana	16487		534	190	171	310	265	421
North Dakota	3645	257	296	144	226	203	(225)	273
South Dakota	21940	552	832	505	488	235	791	128
Utah	9443		249	193	145		43	
Wyoming	2964	23	98	39	13	41	(27)	54
REGION IX								
Hawaii	780			4	—		—	
Arizona	69633		558	184	83	513	225	547
California	66495	353	319	447	378	8	(464)	
Nevada	4938		73	15	19	10	(10)	
REGION X								
Alaska	26942		393	536	—		(577)	1
Idaho	4566		296	37	—		(59)	3
Oregon	10238	84	247	202	114		254	
Washington	23081	503	558	405	497		(555)	

II - States only
 III - 19 States and BIA
 IV - County Census
 V - 37 States
 VII - 12 States

II. Adoption of Indian Children

Beginning in 1958, the BIA contracted with the Child Welfare League (CWLA) to operate an interstate adoption clearinghouse for Indian children (ARENA). From 1957 through 1967, 395 Indian children were placed in eastern and midwestern homes, almost entirely with non-Indian families. 195 of these and possibly more were of Canadian Indian origin. An additional 323 children were placed between 1968 and 1974, some of whom were handicapped, of mixed race parentage, etc. Beginning in 1972, special efforts were made to recruit Indian adoptive parents and this effort was relatively successful, with the majority of children from 1972 to 1975 being placed with Indian families. Numbers of American Indian children referred to ARENA decreased although they continued to place Canadian Indian children, 106 in 1974^{3/}.

In 1973, the BIA also funded the Jewish Family and Children's Service in Phoenix to recruit adoptive parents from surrounding reservations. Initial efforts were promising. The fact that a Jewish agency was chosen for this activity highlights the fact that there were no Indian Child Welfare agencies at that time. The current Phoenix Indian Center is one outcome of this particular effort^{3/}.

In 1976, the AAIA^{2/} study attempted to make a cumulative count of Indian children placed by the 19 States they studied. AAIA identified 11,112 children from 13 States but periods

covered varied from 1 to 5 years depending on the State. Some calculations were based on assumptions that Indian children were adopted at the same rate as white children. As with foster placements, most were placed with non-Indian families. This figure implies that over 2,000 children per year were being placed.

Neither the 1977 Westat survey ^{4/} nor the 1980 OCS report ^{5/} provided any data on adoptive placement. The VCIS 1982 and 1983 reports provided raw data but ACYF staff choose not to report the American Indian figures because they are considered unreliable. The 1984 ^{7/} raw data, also unreliable, indicates that 78 Indian children were placed in finalized adoptive placements in 1984, and 79 are free for adoption, awaiting placement. These are clearly minimal numbers with only 31 States reporting.

The Three Rivers Native American Adoption Resource Exchange, Pittsburgh, Pennsylvania, currently (1986) reports a waiting list of 39 children, most of whom have physical problems or intellectual limitations. Three Rivers has placed 11 children in the past year. There are many other exchanges: 46 state, 7 regional and 1 national. Depending on geographic location, they have a few Indian children listed. The Seattle regional exchange estimated that possibly 5% of their children were Indian, but at the time of our request, there were only 2 listed in a total of about 100 children. The National Adoption Exchange, Philadelphia, had a total of 11 children listed over

the past 9 months, and only two applicant Indian families^{10/}. All children placed through exchanges would be reported in the respective State figures under VCIS.

A 1986 Westat, Inc.^{11/} survey of adoption exchanges found a total of 122 Indian children listed--1.04% of the total of 11,720 children listed which is approximately equal to the proportion of Indian children in the United States population. Indian children are somewhat younger, and less likely to be handicapped, than other children listed, both characteristics which would encourage adoption.

The Indian Child Welfare Act directs the court approving the adoption of an Indian child to report that adoption to the Secretary of Interior. No additional information is required. Currently, the BIA makes available a compilation of these figures. From 1979, through 1984 (6 years) 1011 adoptions have been reported, about 170 per year. However, inspection of the figures, especially when compared to Indian population, and size of the foster care population raises many questions. Table 2 presents the 16 States with the largest Indian population, from most to least. The first column is the estimated Indian foster care placement for 1984-85.

Column 2 is a summation of adoption reported to the Secretary of Interior over a 6 year period. The last two columns show the very fragmentary State reporting of adoptions completed and number of Indian children free for adoption in 1984. The

Alaska figure for adoptions seems surprisingly high compared to the other States and suggests underreporting in this other States. A draft of Alaska's FY 1985 Annual Statistical Report^{12/} notes that 56 children were placed for adoption in 1985 and that because of reduced staff, 27% or 15 of these were placed in non-native homes. If these scattered figures can be accepted as representative, it appears that the number of American Indian children being placed for adoption in the mid-1980's is probably reduced from the levels common in the 1960's and 1970's and that efforts are made to encourage placement with Indian families. Such a reduction in adoptive placement may also tend to increase the number of children in long term foster care.

However, the reporting is so unclear and fragmentary in both systems that no real conclusion can be drawn concerning numbers or rates of adoption, and particularly it is not possible to determine whether placements are made with Indian families.

Table 2

	Estimated Indian Foster Care 1984-85 State & BIA	Reported to BIA as Adopted 1979-1984 (6 Year Total)	VCIS -1984 State Report	
			Adopted	Free for Adoption
1. California	464	13	6	18
2. Oklahoma	241	120	NA	NA
3. Arizona	772	18	1	3
4. New Mexico	355	4	1	0
5. North Carolina	36	9	9	3
6. Alaska	578	536	NA	NA
7. Washington	555	7	4	NA
8. South Dakota	919	14	NA	NA
9. Texas	29	11	8	2
10. Michigan	72	17	NA	NA
11. New York	49	8	NA	NA
12. Montana	686	4	NA	NA
13. Minnesota	560	65	10	17
14. Wisconsin	261	27	13	NA
15. Oregon	254	22	7	14
16. North Dakota	498	3	1	NA

III. The Latter Day Saints Indian student placement program is another interesting and to some, a controversial out of home placement. The Mormon or LDS religious beliefs have a special reference to American Indians and since 1945 when three Navajo children asked for permission to stay with a Mormon family in order to attend school, the church has developed an extensive educational program. Until 1954, numbers involved were small, but the program expanded rapidly from around 250 children per year to almost 5,000 around 1970, was reduced to 2300 by 1975, and has now reached a level of about 1200^{3/}. Since 1984 it has been phased into a high school program and it is expected to continue to serve approximately 1200 children per year.

Most children are placed with Utah families, with a few in California, Idaho and New Mexico. This program is entirely private and voluntary with an agreement between the child's parents and a representative of the church. However, since 1979, the children have been registered through the Interstate Compact on the Placement of Children. The Mormon homes are licensed as foster homes, and while the family is not reimbursed, they are allowed an income tax deduction.

A recent evaluation ^{13/} of the program found that participating children progressed further educationally than a comparison sample but there were no significant differences in job levels. Indian parents and children, and the foster parents were all pleased with the program.

IV. Boarding Schools

The Bureau of Indian Affairs has been operating Boarding Schools since the late 1800's, and this has always been one of the significant ways in which Indian children have been separated from their families. However, serious questions as to the intent of the program and the quality of education provided has resulted in a considerable decrease in recent years.

According to the Children's Bureau 1976 report^{3/}, in 1974 the BIA was operating seventy-five boarding schools enrolling over thirty thousand students. Their study found that "a majority" of the students were enrolled for social rather than educational reasons and cited criteria used by BIA social workers. These included neglected or rejected children, those from large families with no suitable home (housing), those with behavior problems which the family could not handle and where no services were available locally, and those where illness of caretaker jeopardized the child.

In 1976, school teaching staff was mixed Indian and white but dormitory house parents tended to be largely of Indian background. Schools reported quite diverse proportions of children as being "social" placements, and no count was made of the total number in school.

In 1980, the AAIA study^{2/} reported a total of 19,192 children in boarding school, with 55% in the elementary grades. While still a large number, this is a considerable decrease from the "over thirty thousand" reported six years earlier.

The AAIA urged the Bureau to adopt a Day School Implementation Plan with local Indian community control of the school. This change is in progress. In the 1985-86 school year, the Indian Education Division reported approximately 15,000 children in boarding school or in dormitory living situations while attending public schools^{14/}.

	<u>Number</u>	<u>Percent</u>
Grades 1-3	2,828	18.9
Grades 4-8	5,592	37.3
Grades 9-12	6,563	43.8
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	14,9883	100.0

This maintains the same proportion of younger children (56%) as in 1980, with almost 3,000 being under age 10. We have no estimate of what proportion of children may be enrolled for social reasons. However, it seems clear that BIA boarding schools and dormitories play a much reduced role in the socialization and education of Indian children. One can still question the necessity for this number of elementary school children to be placed in boarding schools. The need for high school is much more easily justified in rural areas. To the

extent that elementary school placements may be for social rather than education reasons, the overall decrease may mean that some more children are being placed in foster care as an alternative to boarding school placement.

Summary and Recommendations:

On balance, it appears that ICWA has reversed a trend and Indian children are more likely to be living with their families than was true 10 or 12 year ago.

Educational placements have been greatly reduced, adoption is probably reduced, with more children adopted by Indian parents. We assume that foster placement is also more likely to be with an Indian family, and many foster programs are under tribal or urban Indian Center direction. Nevertheless, the number of children in foster care is high and increasing.

Whether or not this last observation is important is a matter for debate. Experienced workers in the field indicate that more services are regularly available for families and that foster placements are increasingly with Indian families and under tribal auspices. If foster care is being used in lieu of boarding school and as an alternative to adoption for older children, the current levels may be appropriate.

Our major recommendation is that a reporting system should be developed for Indian Child Welfare which includes all of the involved agencies: Tribal courts and tribal social services, State courts and social services and the Bureau of Indian Affairs. Current legislation requires a review of adoption and foster care statistics nationally, with a revised system of reporting expected to be in place by 1992. The special case of American Indian and Alaskan Native children must be included in the new overall reporting system.

NOTES

1. Cited in grant application from Council of Three Rivers American Indian Center, Inc. submitted to BIA March 23, 1987, page 8, "Quantitative Data and Client Population".
2. Indian Child Welfare Statistical Survey, July 1976, conducted by Association of American Indian Affairs, Inc. 432 Park Avenue South, New York, NY 10016 at the request of the American Indian Policy Review Commission, an agency of the U.S. Congress. Appendix G, pages 537-603.
3. Indian Child Welfare: A State of the Field Study USDHEW Childrens Bureau Publication No. OHD-76-30095. 1976
4. National Study of Social Services to Children and Their Families Ann W. Shyne and Anita G. Shraeder. DHEW Publication No. OHDS-78-30150. 1978
5. 1980 Children and Youth Referral Survey, Public Welfare and Social Service Agencies DHHS, Office of Civil Rights, Vol. I & II Washington, DC 1981
6. Voluntary and Cooperative Information System (VCIS) The American Public Welfare Association, Washington, DC, June 10, 1983.
7. Child Welfare Statistical Fact Book 1984 Substitute Care, Adoption, USDHHS, A.C.Y.F.
8. Child Welfare Assistance by State for One Month Period, August 31, 1983. Special tabulation from BIA Social Services.
9. Child Welfare Assistance by State for One Month Period, August 31, 1985. Special tabulation from BIA Social Services.
10. National Adoption Exchange, Quarterly Statistical Report, Summary, April - June 1986. Submitted to Children's Bureau, July 1986.
11. Study of Adoption Exchanges. Westat, Inc. Submitted to ACYF under Contract 105-84-1804. No date. (approximately 1986).
12. FY85 Annual Statistical Report, Division of Family and Youth Services, 1986. Appendix A, Draft Report.
13. Chadwick, Bruce A, Stan L. Albrecht and Howard M. Baker "Evaluation of an Indian Student Placement Program" Social Casework, November 1986, 515-524.
14. US Department of Interior, Budget Justifications, FY 1987, BIA p. 41 and 42.