

Understand Unique Data Concerns When Working with Tribes

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About the Series

The **BestPractices4Data** series focuses on sharing innovations and best practices for grantees, from grantees.

In 2023, the Substance Abuse and Mental Health Services Administration (SAMHSA) convened listening sessions with grantees and government project officers to learn about strategies that grantees use to optimize data collection processes. Produced by the SAMHSA Center for Financing Reform and Innovation (CFRI) contract, the series of issue briefs aims to improve efficiency in the use of grant funds by providing opportunities for grantees to learn from each other. The briefs identify best practices that help reduce costs associated with resource-intensive trial and error attempts typical of new grantees who are trying to figure out the best ways to collect data.

All SAMHSA grantees are required to collect data as a condition of their funding. Grantees sometimes refer to these as Government Performance Results Act (GPRA), National Outcome Measures (NOMs), client-level data, participant-level data, program-level data, or progress reports. The **BestPractices4Data** series brings together innovative and best practices that grantees use to address the most common and complex challenges associated with grant-required data collection activities.

Grantees can determine their data collection requirements by reading their grant's Notice of Award (NOA).

American Indian and Alaska Native Tribes and Tribal organizations represent an important group of SAMHSA grantees. Tribal grantees face unique challenges with collecting and reporting required data. Sometimes grantees note that the required questions are insensitive or not relevant to Tribal clients or individuals served by Tribal grantees. Tribal communities also have historic distrust of federal data collection efforts. Below are some best practices that grantees follow when working with Tribes.

Best Practices



Establish a data governance framework



Identify a decision-maker or group of decision-makers to oversee the data governance program



Respect tribal culture, customs, privacy, and perspectives



Build capacity within the tribal community and solicit regular feedback



Think creatively when trying to engage clients in data collection

This issue brief considers the common challenges identified by SAMHSA grantees. It highlights innovative and practical ways that grantees address these challenges.

Respecting Data Sovereignty

Because Tribes are sovereign nations, they have the right to data sovereignty. This means that Tribes have the right to control how Tribal data are collected, stored, and used.









Tribal data sovereignty is a vital right for Tribes, as it prevents the continued colonization of Tribal data by other governments and entities. There are times when Tribes choose to share their Tribal data with outside agencies and organizations. Many SAMHSA Tribal grantees find ways to collect and report on required grant data elements, while being respectful of Tribal data sovereignty principles.

Establish Data Governance Framework

Tribal communities differ from each other and from non-Tribal communities. For example, Tribes may have different governance structures, needs, customs, and values. Data governance is a set of agreed upon rules surrounding the collection, storing, sharing, ownership, and use of data.

Some Tribal grantees use a data governance framework to help align the expectations within their organization and community. These frameworks are a useful starting point for identifying principles to consider when applied to today's broader uses of data by communities.

Components to Consider When Developing Your Data Governance Framework¹

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1 Openness, transparency, and choice: Describe what information is being collected and why.
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2 Purpose specification: Explain the initial purpose of the data collection and its downstream uses. Fully define the purpose and be explicit about the purpose during data collection.
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3 Community engagement and participation: Determine whether and how the community should be involved in decision-making about data.
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4 Data integrity and security: Evaluate and ensure confidentiality and integrity of the data. Address any risks to data confidentiality and integrity.
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5 Accountability: Identify a person or entity responsible for implementing the data governance at each stage of the data lifecycle (e.g., initial data collection, data storage, data reporting, analysis, etc.)
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6 Protection of de-identified data: Ensure data are de-identified, as appropriate, and have administrative safeguards to protect personal identifying information.
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7 Attending to the risks of "enhanced" data sets: Evaluate whether the re-identification risks are appropriately managed.
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8 Stigma and discrimination: Ensure that the data interpretation and analyses do not stigmatize or result in negative attitudes towards community.

¹Adopted from the Eight Components of the National Committee on Vital and Health Statistics (NCVHS) Stewardship Framework for the use of Community Health Data Recommendation Letter-A Stewardship Framework for Community Health Data ([hhs.gov](https://www.hhs.gov))

Important Considerations for Data Collection and Use

SAMHSA's Tribal grantees report that data collection needs to be sensitive to the unique characteristics of their communities. Tribal grantees and organizations that provide services within Tribal communities report that careful planning and underlying respect for the community and clients is essential for meeting grantee data requirements.

SAMHSA grantees offer the following advice:

Respect Tribal Culture, Customs, and Privacy

Grantees should communicate to their clients that data collection is not mandatory, and they will receive services regardless of whether they consent to participate in evaluation activities.



Build Capacity within the Tribal Community

Some grantees have invested in building capacity within their tribal organizations such that evaluators and data collectors are part of the Tribal community and integrated into the grantee's organizational structure. Native Connections Grantee Technical Assistants ([Grantee Technical Assistants \(GTA\) | SAMHSA](#)) helps Tribes build internal capacity to create culturally sensitive programming, provide assistance with approaches to data reporting, and help grantees find additional grant funding sources.

Remember that Some Grant-Required Data May Not Be Inherently Meaningful to Tribes

Be sure to discuss community needs, culturally-informed service provision, or whether particular services are appropriate for Tribal members. Ensure additional data collection of Tribal priorities. Always remember that American Indians and Alaskan Natives are the experts on their own communities and experiences.



Use Trauma- and Culturally-informed Interviewing

Take steps to make clients comfortable. Consider pacing, nonverbal communication, and body language. Have clarifying conversations to help clients understand confidentiality.



Include and Incorporate Tribal Perspectives

Data metrics and indicators may not always align with Tribal priorities and values. Find way to include Tribal perspectives in the interpretation of data. This will ensure data is meaningful and relevant.



Be Creative When Trying to Engage Clients in Data Collection

In rural areas, keeping in touch with clients can be especially difficult. Grantees should attempt a range of options for follow-ups, such as phone calls, emails, and social media. Some grantees also use grant funds to supply clients with gas cards and phone cards, which can make reaching them easier.



Solicit Regular Feedback

Regular feedback from clients, staff, and data collection staff is important. Grantees find that gathering feedback about the processes outlined in the data governance plan helps strengthen the processes that work and allows for discussion and adjustments to be made when needed.

For example, some Tribal grantees have worked with their SAMHSA Grant Project Officer to ensure that questions regarding race and ethnicity list “American Indian / Alaska Native” as a unique, stand-alone category. Others have asked that clients be allowed to select multiple races/ethnicities. Some grantees add a question regarding Tribal-affiliation.



Identify a Decision-Maker or Group to Oversee the Data Governance Program

Grantees find it helpful to identify a person or organization that is responsible for making sure that data are collected, stored, and used in accordance to the data sharing use agreement. This streamlines where inquiries and concerns should be directed. It allows for ongoing feedback and suggestions to be recorded centrally.



Create a Data Use and Data Sharing Agreement

This agreement is a living document that should be revised and adjusted as data requirements, data collection and dissemination activities evolve and change. It reflects many of the decisions made within the data governance framework. Within this agreement, it is common to include stipulations that non-Tribal organizations cannot share Tribal data or findings without written authorization from Tribal leadership.

Best Practices Spotlight

“Soon after receiving our grant, we began talking with the other Tribal grantees to figure out the best way to proceed. We are a small organization, with limited resources for data collection. We ended up creating a consortium with four other grantees. We hired an evaluator together and shared resources. The evaluator was able to develop protocols and make them unique to each organization; she spoke with tribal leaders to ensure that organizations had proper permissions in place and to identify any tribal traditions that would impact data collection (e.g., holy days); and we each got customized data reports. It was nice to work with other grantees and have a knowledgeable evaluation lead.”

– **SAMHSA Tribal Opioid Response Grantee**

Additional Resources

[Health and Human Services Administration: Children and Families’: Children’s Bureau’s A Roadmap for Collaborative and Effective Evaluation in Tribal Communities](#)

[Indian Health Service’s Grants Training Tools](#)

[Indian Health Service’s Tips for Preparing Grant Applications](#)

[Office of Justice Program: Bureau of Justice Assistance’s Tribal Data Sovereignty and the Critical Role of Data in Public Health Governance](#)

[SAMHSA Center for Financing Reform & Innovation \(CFRI\)](#)

[SAMHSA’s Office of Indian Alcohol and Substance Abuse](#)

[SAMHSA’s Office of Tribal Affairs and Policy](#)

[SAMHSA’s Office of Tribal Policy and Affairs News and Events](#)

[SAMHSA’s Partnerships for Equity](#)

[SAMHSA’s Tribal Training and Technical Assistance Center](#)