



First Nations Health Consortium Service Access Resolution Fund: Pilot Project Report





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Service Access Resolution Fund Pilot Project



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FIRST NATIONS
HEALTH CONSORTIUM

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Cover art: Maddie Grier, Piikani Nation Blackfoot Confederacy

Recommended citation: Sinha, V., Knott, J., & Phillips, B. (2021) *The First Nations Health Consortium Service Access Resolution Fund Pilot Project*.
Edmonton, AB: First Nations Health Consortium.

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The First Nations Health Consortium Service Access Resolution Fund pilot project: Executive summary

The First Nations Health Consortium (FNHC) supports First Nations families, living both on and off reserve, across the Alberta region in accessing education, health, and social services to meet their children's needs.¹ The FNHC was founded in 2017, with funding from the Jordan's Principle Child First Initiative (CFI), which is intended to fulfill the federal government's obligation to ensure that every First Nation's child receives services that meet their needs in a timely fashion. The Jordan's Principle CFI included funding for Enhanced Service Coordination (ESC) initiatives that support families in accessing existing services and in requesting Jordan's Principle funding to address needs that cannot be met through existing programs and policies. Monies to respond to requests are drawn from a Service Access Resolution Fund (SARF) that was established as part of the CFI.^{2,3}

In the first two years of ESC operations, FNHC staff reported an ongoing pattern of delays in the federal government's assessment of and response to Jordan's Principle requests.^{2,3} The FNHC sought to address the identified delays.

A key focus was reducing delays in the processing of SARF payment after a Jordan's Principle request for funding was approved by the federal government.

The SARF pilot project: As an independent organization with flexible administrative procedures, the FNHC sought to reduce the SARF payment processing time by administering payments on behalf of the federal government. The FNHC worked with the regional office of the First Nations Inuit Health Branch (FNIHB) to develop a pilot project and began processing SARF funds in mid-2019. The pilot project was fully established by the fall of 2019. Since that time, the FNHC has processed between

The FNHC's SARF payment process is:

- Efficient - average payment time 10-15 days shorter than FNIHB.
- Flexible – allows for advance payment and payments across fiscal years.
- Thorough – includes multiple verification steps that support clients and vendors.

\$300,000 and \$1.5 million in SARF payments each month.

The FNHC SARF process: In comparison with the federal government's payment process, the FNHC's SARF payment process is:

1. Quicker and more efficient, with an average time-to-payment that is 10-15 days shorter than through FNIHB.
2. More flexible, allowing for advance payment and for payments across fiscal years when necessary.
3. More thorough in its verification processes and extension of supports to both clients and vendors.

A relational approach: The FNHC's approach to the administration of SARF payments is built on a foundation of strong relationships with clients, vendors, the federal government, and enhanced service coordination staff. The FNHC's role extends beyond simply administering payments to ensuring that:

- The release of payments aligns with family needs and expectations;
- Family expectations align with federal government policies;
- Vendor expectations and actions align with federal government policies;

- There are no disruptions in services funded through Jordan's Principle; and
- Challenges in the SARF payment processes are documented and analyzed to inform development of policies and procedures that better serve First Nation families.

Keys to success: Effective administration of SARF payments requires:

- In-depth understanding of Jordan's Principle policies and procedures;
- Strong relationships with the regional FNIHB office and ESC staff;
- An ability to organize and analyze case files and administrative data;
- Experience working with vendors; and
- The ability to work directly with families.

The success of the SARF pilot rests in the hands of a manager who is trusted by both the FNHC *and* federal representatives to use her discretion in navigating situations in which federal policies do not align with family or vendor expectations.

Continued funding: The FNHC's SARF pilot project was initially funded for two years. Funding was recently extended for another year, with the expectation that the FNHC will continue to process SARF payments on an ongoing basis.

The First Nations Health Consortium: Implementation of Jordan's Principle

The First Nations Health Consortium (FNHC) supports families in accessing education, health, and social services to meet their children's needs. The FNHC serves all First Nations children and families, living on and off-reserve, across Alberta. It is a collaboration between four First Nations health organizations serving 11 First Nations in Treaty areas 6, 7, and 8: Bigstone Health Commission, Kee Tas Kee Now Health Commission, Maskwacis Health Services, and Siksika Health Services.^{1,2,3}

The FNHC was founded in 2017, with funding from the Jordan's Principle Child First Initiative (CFI). The CFI is the federal government's short-term response to Jordan's Principle, which is a child-first principle designed to ensure that every First Nations child receives equitable services. A portion of the funding for the Jordan's Principle CFI was dedicated to supporting "enhanced service coordination" (ESC) initiatives. These ESC initiatives were intended to help families secure timely access to health, social, and educational

The FNHC systematically prioritized building relationships with a broad range of stakeholders.

services. In addition, the CFI established a Service Access Resolution Fund (SARF) to cover the costs of services for First Nations children (individual children or groups of children) whose needs could not be met through existing services.^{2,3}

Developing the ESC Model

The FNHC successfully applied for funding to deliver ESC across Alberta and received funding in February of 2017. Building on the resources and networks of its founding members, the FNHC developed and implemented an ESC model. The FNHC systematically prioritized building strong relationships with:

- First Nations,
- The government "focal points" charged with responding to Jordan's Principle requests,
- Service providers, and
Regional/national policy actors.

What is Jordan's Principle?

Jordan's Principle aims to eliminate the service inequities that First Nations children face when accessing public health, education, and social services in Canada. It is named in honour of Jordan River Anderson, a First Nations child from Norway House Cree Nation, in Manitoba. Jordan was born with a rare neuromuscular disease. His complex medical needs could not be treated on-reserve and he was transferred to a Winnipeg hospital that was far from his community and family home. In 2001, a hospital-based team decided that Jordan's needs would best be met in a specialized foster home. However, federal and provincial governments argued over financial responsibility for Jordan's out of hospital care. The disputes ranged from disagreements over funding of foster care, to conflicts over payment for smaller items such as a showerhead. During these conflicts, Jordan remained in hospital, even though it was not medically necessary for him to be there. Jordan died in 2005 at the age of five, never having had the opportunity to live in a family home.⁴

In honour of Jordan River Anderson, Jordan's Principle was initially articulated as a child-first principle that was intended to ensure that First Nations children have timely access to the same services as other children in Canada. Though this vision of Jordan's Principle was unanimously endorsed by the House of Commons in 2007, it has never been fully implemented.⁵

Progress towards the implementation of Jordan's Principle has been made since 2016, in response to a series of Canadian Human Rights Tribunal (CHRT) rulings and court orders arising from a decade-long legal battle initiated by the First Nations Child and Family Caring Society of Canada and the Assembly of First Nations. The CHRT ruled that inequitable funding and administration of on-reserve child welfare services constitutes ethno-racial discrimination against First Nations children. As one of the immediate remedies in this case, the CHRT ordered the federal government "to immediately implement [Jordan Principle's] full meaning and scope."⁶ In a series of follow up rulings, the CHRT clarified that Jordan's Principle applies to *all* First Nations children, whether they live on or off reserve, and instituted strict response timelines for Jordan's Principle cases: response to individual Jordan's Principle requests must occur within 48 hours of receiving all documentation and within 12 hours for urgent requests.

The CHRT also ruled that services provided through Jordan's Principle must reflect consideration of "the distinct needs and circumstances of First Nations children and families living on-reserve—including their cultural, historical and geographical needs and circumstances—in order to ensure equality."⁷ Accordingly, services provided under Jordan's Principle may exceed those provided under normative provincial standards if this is needed to meet the best interests of the child.

For more information on Jordan's Principle see:

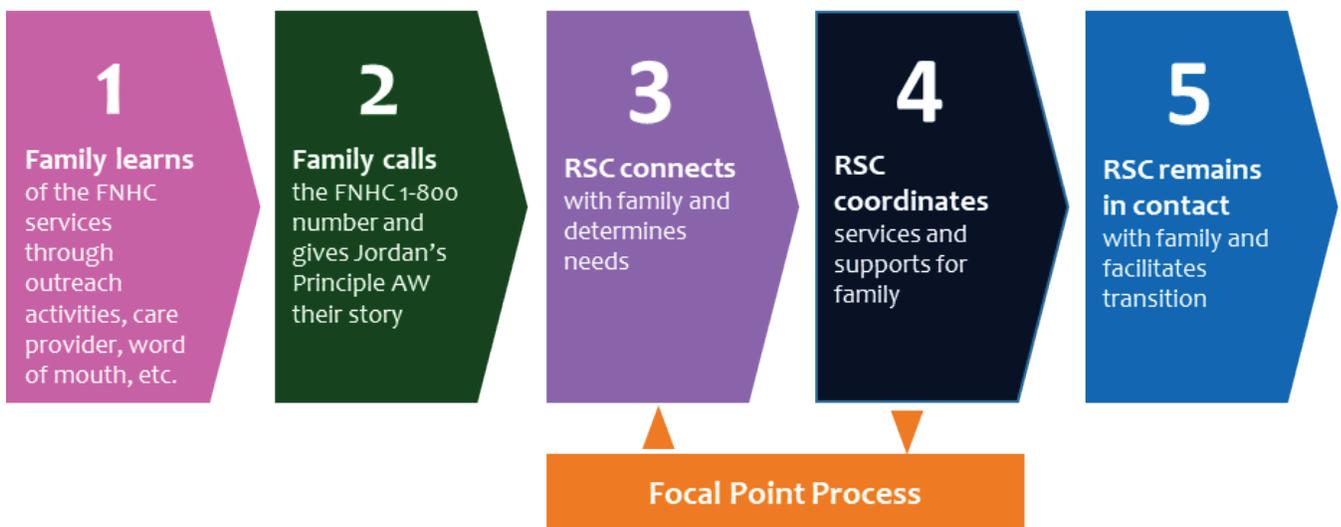
<https://www.canada.ca/en/indigenous-services-canada/services/jordans-principle.html>

Building and maintaining these relationships was the key to addressing challenges encountered in implementing the ESC model. Strong relationships provided a foundation on which the FNHC has built in order to increase access to services for First Nations children in Alberta.^{2,3} With the support of the First Nations Inuit Health Branch (FNIHB) regional office (that plays a leading role in implementing Jordan's Principle in Alberta), Health Co-Management (HCoM, the structure for First Nations and federal health co-management. within the Alberta Region⁸) and provincial departments, the FNHC established the ESC model province-wide

The ESC model: An overview ³

In the FNHC service coordination model Jordan's Principle Access Workers complete an intake process in which they document family's stories and concerns. They also complete immediate referrals to services when appropriate. Cases are then transferred to Regional Service Coordinators (RSCs) with diverse backgrounds in health, education, and social services. RSCs work with families to determine their needs and connect with existing services. When needed services are not available, RSCs support caregivers and community service providers in completing Jordan's Principle requests.^{2,3}

The ESC Model²



Facilitating access to services

Since October of 2017, the FNHC has helped facilitate access to health, education, and social services for First Nations children and families.² The FNHC's frontline staff work closely with families to identify their needs and facilitate connections with needed services. They also support families with complex needs through ongoing case management. Because the FNHC provides ESC services for all First Nations families in Alberta, staff must have knowledge of both federally funded and provincial services that are available, across service domains and across the entire Alberta region.^{2,3}

In 2019-2020, through the ESC process, the FNHC supported families in addressing over 1,300 individual needs. Roughly 70% of cases were facilitated by connecting families to existing services; in 30% of cases, a Jordan's Principle request was initiated.¹² Through ESC, the FNHC also supported First Nations and organizations serving First Nations families to access funding for new services. In addition to facilitating individual Jordan's Principle requests, the FNHC supported the

In 2019-2020, the FNHC:

- Helped address over 1,300 needs.
- Connected 70% of cases to existing services.
- Initiated Jordan's Principle requests in 30% of cases.
- Supported development of 54 group requests.

development of 54 diverse group requests in 2019-2020. Group requests, for Jordan's Principle funding to address the needs of groups of First Nations children, are transforming the landscape of services available to First Nations children in Alberta. Group request funding supports the development and extension of services that were not previously available.

However, there has been little transparency or systematic dissemination of information about the new services being developed.³

As a result, RSCs and Jordan's Principle Access Workers must continually work to update their knowledge of the services that may be accessed by First Nations children and families.

Federal government impact on the development of ESC services

The FNHC's development of ESC services has been shaped by the federal government's approach to the implementation of Jordan's Principle. Key aspects of this approach include:

- **Short timelines** for funding and submission of funding proposals,
- **A lack of guidance** as to the nature of ESC model, and
- **Shifting Jordan's Principle policies and eligibility criteria.**

Accordingly, the FNHC had to adapt to changing federal processes and requirements while also quickly developing, implementing, and improving an ESC model, all with minimal federal guidance.^{2,3}

A complex historical context: The task of providing service coordination for First Nations children has also been complicated by a historical context in which government policies have created resource scarcity and competition, fostering distrust between some First Nations communities and organizations. The FNHC has taken a *relational approach* to addressing these challenges: FNHC staff and administrators

The FNHC had to adapt to changing federal processes and requirements while also quickly developing, implementing, and improving an ESC model, all with minimal federal guidance.

draw on their pre-existing networks for support and guidance while systematically working to build strong relationships with government focal points, service providers, and other First Nations.^{2,3}

Inconsistent federal policies: The development and implementation of the ESC process was also affected by inconsistent federal policies and processes. The federal government's approach to implementing Jordan's Principle gave individual focal points broad latitude to decide on the documentation required to support each Jordan's Principle funding request. The government did not provide clear and consistent, publicly available standards around documentation. In addition, frequent policy changes, driven by both decisions from the national Jordan's Principle office and the Canadian Human Rights Tribunal were announced with little

advance notice. As a result, requirements and expectations around the documentation that RSCs had to help prepare varied over time and across cases.^{2,3}

Delays in response to Jordan's

Principle requests: In the first two years of service coordination efforts, FNHC staff reported an ongoing pattern of delays in the federal government's assessment of and response to Jordan's Principle requests. These delays were tied to the shifts in Jordan's Principle policy, and to a federal government failure to fund the infrastructure required to efficiently respond to Jordan's Principle requests. Focal points faced with high caseloads and rapidly changing national standards struggled to respond to Jordan's Principle requests in a timely manner. FNHC staff reported that they were asked to respond to multiple requests for additional or revised documentation. In some cases, this was because unclear guidelines meant the desired documentation was not initially submitted. In others, changes in guidelines or policy called for additional documentation after initial submission.^{2,3}

In either situation FNHC staff worked with families to compile additional documentation from the service providers, community supports, and First Nations government officials involved in the case. They also worked with families to satisfy a requirement that they must attempt to access all available services, and document denials at each attempt, in order to be approved for Jordan's Principle funding.

The documentation required for a Jordan's Principle request could often only be obtained at a cost of significant time, effort, and money (involving, for example, travel to access documentation or fees to have doctors letters prepared). This process placed a heavy burden on families and could sometimes take months.^{2,3}

Between 2017 and 2019, FNHC staff reported long delays in the processing of Jordan's Principle requests. Most delays

The federal government deemed only 56% of individual Jordan's Principle requests submitted in 2019-20 to be complete within the fiscal year.

occurred prior to a focal point determining that all necessary documentation had been submitted.^{2,3} Recently released federal data suggests that delays and challenges in this stage of the Jordan's Principle request process persist. Only 56% of individual requests submitted during the 2019-2020 fiscal year were considered complete by the end of the fiscal year. The other 44% of submitted requests were "either pending a decision, on hold pending additional information, referred to existing programs or cancelled by the requester." No additional information about the reasons that requests were not considered complete is publicly available.¹³

Delays and challenges in the initial stage of a Jordan's Principle request persist, even as there has been clear improvement in the time for responding to requests once they have been deemed to include sufficient information. The Canadian Human Rights Tribunal (CHRT) has mandated the federal government to respond to non-urgent, individual requests for Jordan's Principle funding within 48 hours of receiving all documentation and to urgent individual requests within 12 hours. Data on compliance with CHRT mandated response

The Canadian Human Rights Tribunal (CHRT) has mandated the federal government to respond to non-urgent, individual requests for Jordan's Principle funding within 48 hours of receiving all documentation and to urgent individual requests within 12 hours.

timelines show that, while only 58% of individual Jordan's Principle requests were responded to within CHRT timelines during fiscal year 2019-2020, the response within CHRT mandated timelines rose to 91% between April and September of 2020.^{14,15}

In addition to the request stage delays, FNHC staff also reported significant delays in processing SARF payments once Jordan's Principle requests were approved. The federal government process for payment or reimbursement through the SARF was lengthy and complicated. Once a family's request had been approved, the transfer of funds took weeks or even months. FNHC staff reported that families and service providers faced delays of up to 75 days in the release of funds for approved Jordan's Principle requests. These delays directly affected families who paid for

services/supports out of pocket and were left waiting for reimbursement. Families were also affected when service providers refused or delayed services until they knew that payment was forthcoming.²

In response to these delays, the FNHC proposed to administer SARF payments on behalf of the federal government. The development of the ESC model within a very complicated Jordan's Principle policy framework is essential context for the FNHC's SARF administration pilot project.

The implementation of Jordan's Principle in Alberta opened important new pathways and opportunities for First Nations children to access services. However, the federal approach to implementing Jordan's Principle also created: uncertainty around funding and funding processes, delays in provision of funding, and new burdens for families and service providers. The development of the SARF pilot project that is described in the next section of this report is one of multiple, ongoing FNHC initiatives to address these challenges.



Dewey Ah-kim-nachie, Dene Tha' First Nation

Developing the SARF pilot project

The FNHC was committed to improving the Jordan’s Principle process. FNHC administrators began work along multiple lines to address identified delays. They started by advocating for the regional FNIHB office to appoint a specific focal point to work with FNHC staff. The establishment of a single point of contact with the regional FNIHB office:

- Provided greater continuity and consistency in communication around Jordan’s Principle requests.
- Allowed FNHC staff to more efficiently clarify the documentation needed for Jordan’s Principle requests and advocate for action in complex cases.
- Supported the development of a closer relationship with the regional FNIHB office, laying the groundwork for a collaborative approach to addressing challenges in Jordan’s Principle policies and processes.

A second area of focus for the FNHC was reducing the time for processing of SARF payments after a Jordan’s Principle request was approved.

The processing of SARF payments after a Jordan’s Principle request was approved could be delayed for many reasons. The FNHC sought to reduce those delays.

Delays in federal SARF processing

The federal payment process was a complicated and rigid one, bound by strict *Financial Administration Act* requirements and a complex national administrative structure. Jordan’s Principle requests approved and verified at the regional level, in Alberta, were sent to a central Winnipeg office for further processing and eventual payment. The diagram on the next page depicts the best case scenario for processing of SARF payments by the federal government. If a vendor was already registered in the federal system, the payment fully complied with all federal guidelines, and paperwork was processed promptly at each step, payments could be processed within 21-25 days.¹⁶

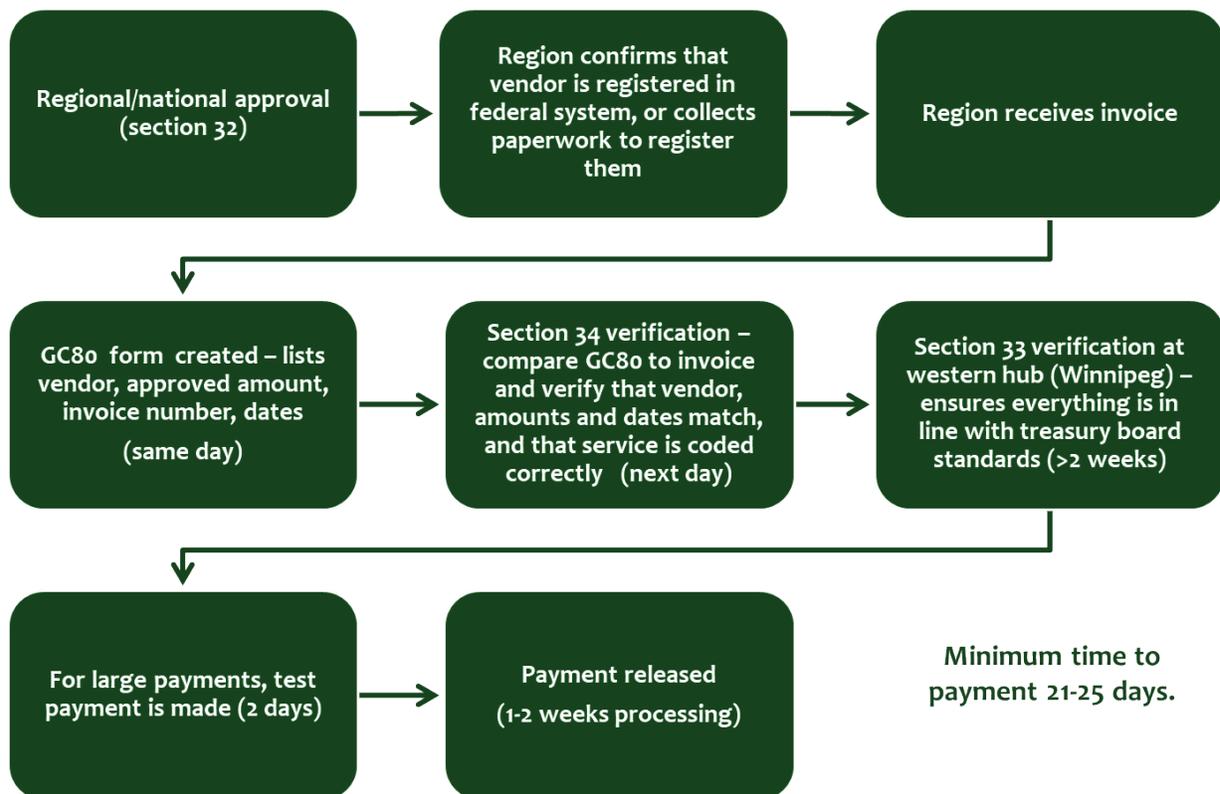
However, as the FNHC staff learned through their ESC work, delays occurred for many reasons.

- Payments could only be made to registered vendors. Searching for a registered vendor added time and complexity to the process.
- New vendors had to register in the federal system prior to receiving payment, and the registration process could take multiple weeks.
- In the initial years of Jordan’s Principle implementation, only two people at the

regional FNIHB office were authorized to complete verification of the paperwork required for payment of a Jordan’s Principle request. When one, or both, was out of the office there were added delays.

- Permission for departures from standard procedure that were necessary to meet a family’s needs - such as advance payment for urgently required services/products – could only be obtained by passing through additional administrative steps and levels of approval.¹⁶

The federal process of payment for Jordan’s Principle services



Proposing to administer SARF payments

As an independent organization with flexible administrative procedures, the FNHC sought to reduce SARF payment processing time by administering payments on behalf of the federal government. FNHC leadership felt that confident that the organization could process SARF payments much more quickly and efficiently than the federal system. In discussing the origins of FNHC's effort to administer SARF funds, the FNHC executive director reminisced, "I said, 'We can pay a hell of a lot faster than that. We can just give Julia a credit card and get a payment out the door!'" The FNHC recognized that appropriate checks and balances would also need to be put in place. Still, FNHC administrators initially anticipated that they could have electronic fund transfers completed within as little as two days.

Discussion around the possibility of the FNHC taking over some of the federal government's payment responsibilities began in April 2018. FNHC leadership passed a resolution supporting the FNHC's proposal to administer payments in late summer of 2018.¹⁰ By December of 2018,

Trial SARF payments for the FNHC

A child was having hip surgery, they needed a specialized car seat to go home from the hospital. . . . Because of our previous working relationship and our relationship with region [FNIHB Alberta office], and we have a credit card, they say, "hey – can you go two blocks over and purchase a car seat and send it to the Nation so that the child has a car seat to come home with."

-FNHC SARF Manager

A family got kicked out of hotel and had to go to another hotel, but they had no means. So, this was a family: 2 parents, 7 kids, the one with needs had cerebral palsy. . . . They couldn't book in another place, because every hotel they [FNIHB] had an agreement with was full. They [FNIHB regional office] had to get national approval to call me after hours and say, "can you do this?" I didn't hesitate, I got changed, I went back to the office. I was on the phone not only with our partners at region but also the hotel, filled out a credit card, appended everything and sent it out . . . It was never a question, it was like, we'll get this done and discuss it later, like what Jordan's Principle was originally for.

-FNHC SARF Manager

the FNHC had assisted in processing nine SARF payments on an emergent bases. In each of the nine cases, federal payment policies were too restrictive to support timely response to a child or family's needs. Two of these cases - one involving a child who needed a specialized car seat to leave the hospital and another involving a large family staying in a hotel while accessing care for one of their children - are described on the previous page. In December of 2018, the FNHC executive director wrote to the regional FNIHB office formally requesting the development of a pilot project in which FNHC would administer SARF payments.¹¹

Establishing the pilot project

Ensuring Treasury Board requirements are met -The FNHC and the regional FNIHB office set about determining the details of what a pilot project might look like. On the federal side, a key issue to be resolved was the question of how to ensure that all Treasury Board requirements were met. At its core, this meant ensuring that the FNHC only paid an invoice if they had the appropriate government authorization. Satisfying this requirement meant the regional office had to develop clear policies and procedures around payment

Establishing a pilot project involved:

- Ensuring compliance with Treasury Board requirements
- Determining a budget,
- Considering issues of liability and confidentiality
- Developing a payment process
- Ensuring accountability

authorization. It was ultimately decided that payment had to be recommended by a focal point and approved by a regional manager; if a regional manager was the person who worked on the case, another manager would provide approval.

Determining a budget - FNHC

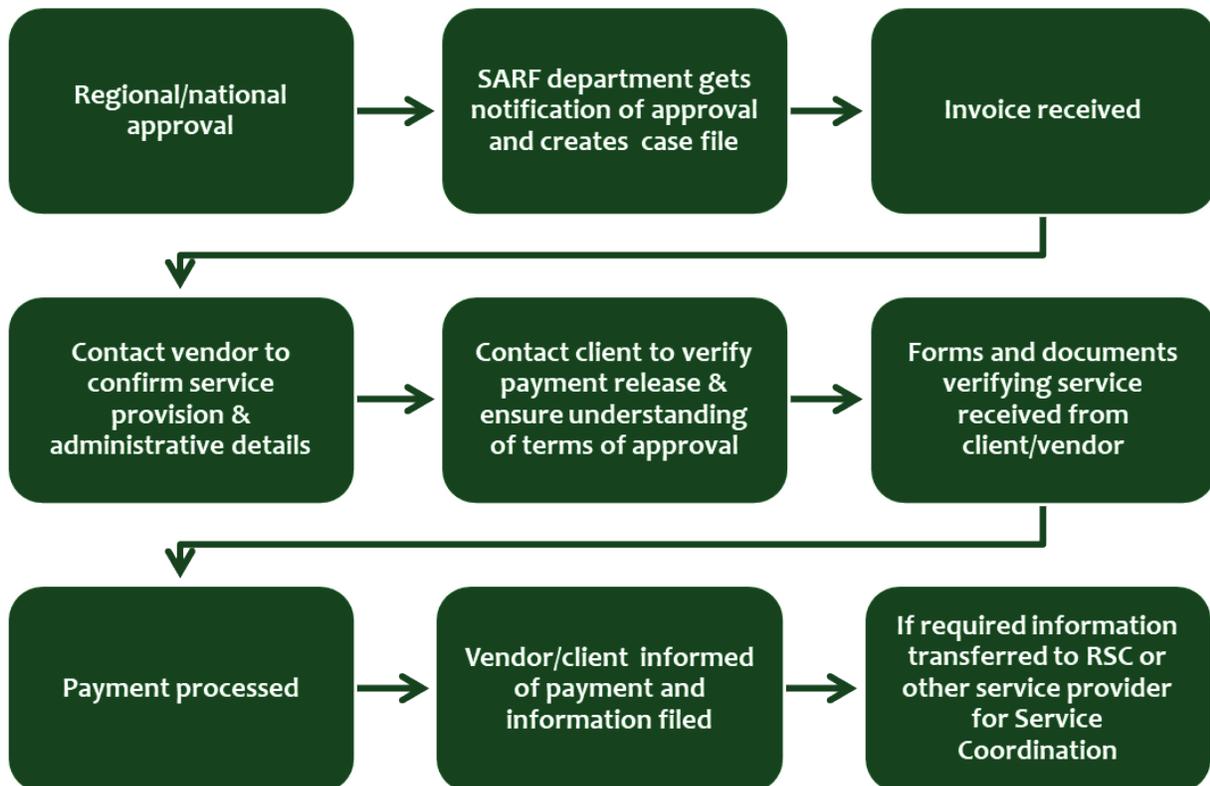
administrators also began assessing what it would take for them to administer SARF funds. They developed a 9-month budget and submitted it to the Regional FNIHB office. Negotiations around this budget centered on administration costs, with FNHC eventually getting a flat-rate administrative fee. (In 2019-2020, the FNHC estimated its administrative fee was equal to 5% of pilot project expenses).

Considering liability and

confidentiality - There were also issues of confidentiality and liability to consider. FNHC administrators sought to limit the liability that the FNHC would potentially accrue by ensuring they did not take responsibility for capital projects. The executive director noted, for example, that they did not have the capacity to verify the safety and integrity of a newly constructed wheelchair ramp prior to dispensing payment. Both the regional FNIHB office

and FNHC also wished to avoid situations in which the FNHC was privy to details of, or perceived as having some control/power over, group request funding that was allocated and dispersed to First Nations and First Nations organizations. Accordingly, it was determined that FNHC should handle payment of *individual* Jordan's Principle requests, for all of Alberta (on and off reserve) *except* those involving capital expenditures, such as housing renovations or adapted van purchases. Allowance was also made for individuals who preferred to

The FNHC payment process



have the federal government process payments associated with their Jordan's Principle requests.

Developing a payment process - HCoM approved the SARF pilot in the fall of 2018. An agreement for the FNHC to begin administering SARF funds was reached in June of 2019. The FNHC began processing payments shortly afterwards. Looking back on the initial days of the SARF pilot project, FNHC's SARF manager noted that there was "no real formal process in place, it was just like, 'let's get this rolling.'"

As the FNHC gained experience in administering funds, they began to learn about the complexities and challenges of the work. The full scope of the responsibilities involved became clearer, and the approach to processing payments that is summarized in the figure the prior page was formalized over time. The FNHC's payment process incorporates many of the same steps as the federal payment process. However, as is depicted in the figure on the prior page, and as will be discussed in the next sections of this report, the FNHC's process yields a significantly shorter time-to-payment while also incorporating an expanded range of verification procedures

Looking back on the initial days of the SARF pilot project, FNHC's SARF manager noted that there was "no real formal process in place, it was just like, 'let's get this rolling.'"

and supports for clients and vendors.

Ensuring accountability - In addition to formalizing a process for individual payments, the FNHC established practices for ensuring they met the requirements of multiple levels of accountability and reporting:

- Record keeping at a level that would pass financial audit and meet standards for annual reporting to the federal government.
- Reporting to the FNHC Board of Directors monthly (slightly less often during periods in which COVID-19 related work is pressing).
- Establishing the FNHC's SARF reporting as a standing item at bi-monthly HCoM meetings.
- Annual presentations to the Chiefs and Councils of FNHC's four founding organizations.

- Reports, upon request, to the Assembly of Treaty Chiefs, which brings together First Nations leadership from across the Alberta region.

Having developed an initial agreement that attended to Treasury Board requirements,

budget, payment processes, and accountability, the FNHC set about implementing the SARF pilot project. Key features of the implementation are discussed in the next section of this report.



Ina Fairbanks (maiden: Old Shoes) Kainai Nation/ Blood Tribe

SARF administration in action

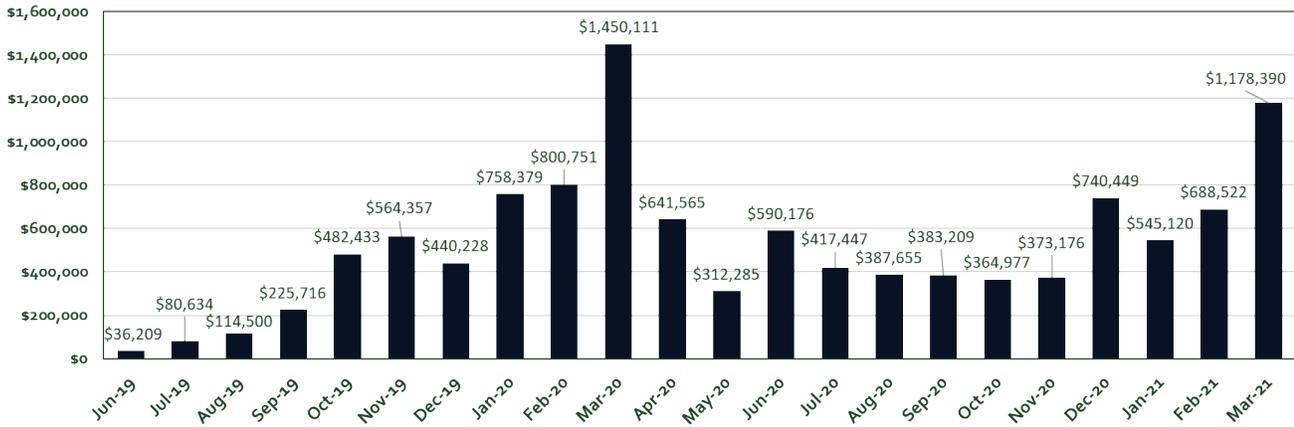
The FNHC moved quickly to establish the SARF pilot, rapidly increasing the number of payments and the amount of funds it processed each month. As the organization gained experience in processing a wide range of SARF payments, its approach to verifying the provision of service shifted from purely administrative to a much more complex, and rigorous approach that centered the development of relationships with clients/families, vendors, service coordinators and other supports, and the federal government. The FNHC's SARF staff grew as needed to manage both the number of payments processed and the increasing complexity of the SARF payment process.

Tracking progress

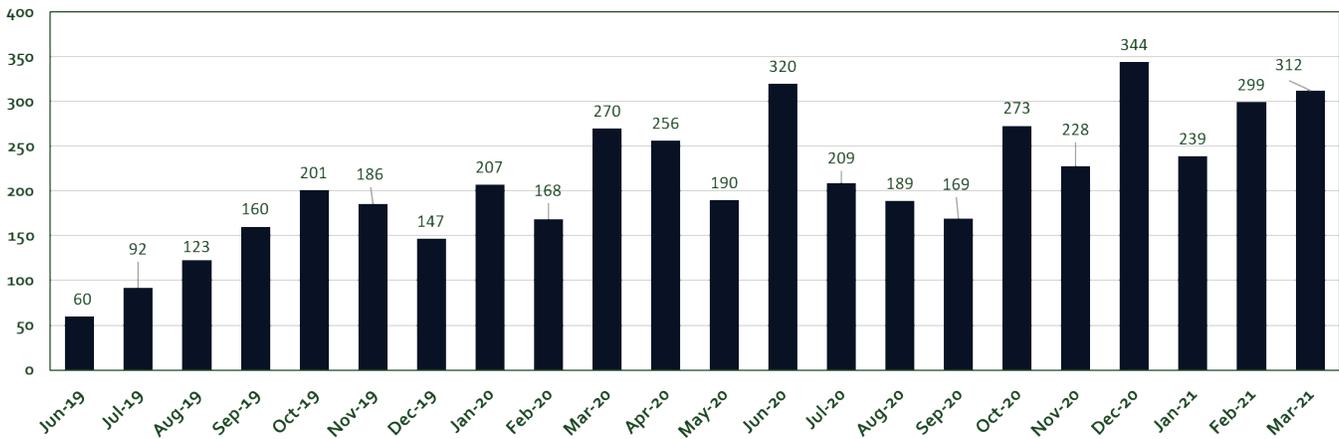
The figures on the next page track the transfer of payment responsibilities from the federal government to FNHC. The first two figures display the amount of funding and the number of SARF payments that the FNHC processed during each month from June of 2019 through March of 2021. On

average, across the period displayed in the graphs, the FNHC processed over 200 payments, and over \$500,000 in payments, each month. Despite the large number of payments being processed, the FNHC was able to process payments significantly more quickly than the federal government. As shown in the final figure on the next page, from the outset of the SARF pilot, the majority of payments were processed more rapidly than the 21-25 day minimum possible in the federal process. In addition, there was marked improvement in payment processing times during fiscal year 2020-2021. In fiscal year 2019-2020, roughly 1/2 of payments were processed within 5 days, and more than 75% were processed within 15 days. Roughly 20% of payments took 16 days or more to process. In 2020-2021, more than 2/3 of all payments were processed within 5 days or less and more than 95% of cases were processed within 15 days. Fewer than 5% of payments took more than 16 days and all cases were processed within 40 days.

Funds processed, by month (June 2019 – March 2021)



Number of payments processed, by month (June 2019 – March 2021)



Time to process payments, by quarter (Summer 2019 to fall 2020)



Flexibility in payment

In addition to being more efficient than the federal payment process, the FNHC's SARF administration is also more flexible. One key area of flexibility has to do with advance payment for services. In order to pay for services/products before they have been provided, the regional FNIHB office requires approvals and administrative procedures that extend beyond the typical federal process. Securing these approvals can be time consuming. In contrast, when needed, the FNHC has the flexibility to advance payment by credit card. Reflecting on the value of this flexibility, a focal point noted that when she calls the FNHC for advance payment, "it's because someone is literally standing in the pharmacy and pharmacist won't release medication unless they get payment up front."¹⁶

Another important area of flexibility is the processing of payments across fiscal years. The need to process payment in a different fiscal year than that in which a Jordan's Principle request was approved could arise for multiple reasons. A Jordan's Principle request might be approved in one year with services being accessed the next year because of long wait-times to access

The FNHC has more flexibility in administering SARF payments than the federal government. For example, the FNHC can more easily pay for services in advance and make payments across fiscal years.

services, complications in arranging travel to access services, or other factors, such as COVID-19 office closures. Recurring services, which a child or family needs to access multiple times over an extended period, could also result in payment occurring in a different fiscal year than request approval. Federal procedures for payment across fiscal years are complicated and, accordingly, the FNHC and the FNIHB regional office devised a system in which FNIHB provides a document authorizing cross-year payments that the FNHC then executes. This arrangement allows the FNHC to meet its standards around record keeping and accountability while creating the flexibility required to efficiently meet family needs.⁹

Scaling up staff

As the number of payments being processed by the FNHC increased, FNHC

administrators advocated for expanded pilot project funding to hire additional staff members. The SARF pilot was initially staffed only by a full time manager and a contract accountant. Additional staff members were hired in:

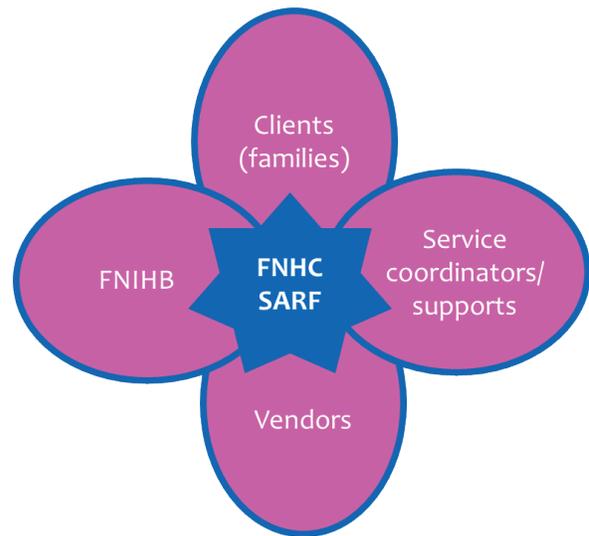
- Late 2019 - an administrative staff member was added to the team.
- March of 2020, an administrative assistant and a data entry position were added to the team.
- March of 2021 - Two additional staff members, an additional administrator and an epidemiologist, were added to the team.

The need for these additional staff members reflects the large volume of payments processed, as well as the FNHC's evolving understanding of its role and responsibilities.

Verifying payments: moving from an administrative to a relational approach

As the FNHC took on the full responsibilities of SARF payment, the executive director and SARF manager came to more fully understand the complexity and challenges of SARF administration.

The FNHC role in verification



With experience in administering SARF payments, FNHC administrators' understanding of the organization's role and responsibilities evolved. A key area of learning was the "verification" process. In the federal government payment process, this verification is achieved simply by comparing a GC80 form, which summarizes key details of the service provided and the approved payment, to the invoice received from a vendor.⁹ FNHC administrators understood, from the outset of discussions around the SARF pilot project, that similar verification of services was part of its SARF responsibilities. However the organization's understanding of what was involved in verification expanded dramatically over time.

The FNHC's role is not just one of accounting, but of building (and sometimes rebuilding) relationships.

At the outset of the pilot project, FNHC administrators saw the task of verification as simply ensuring that a child/family received services before making an approved payment. With experience, they came to understand verification as a much more complex process in which FNHC has multiple responsibilities and plays a key role in mediating relationships.

Through the verification process, the FNHC works to ensure that:

- The release of payments aligns with family expectations;
- Family expectations align with federal government policies;
- Vendor expectations and actions align with federal government policies; and
- There are no disruptions in services funded through Jordan's Principle.

In this context the FNHC's role is not just one of accounting, but of building (and sometimes rebuilding) relationships by providing a level of client and vendor

support that allows for tensions and conflicts to be mediated with minimal delays.

Specific tasks include:

- Contacting clients to ensure that they agree that the FNHC should release payment for services and to help them understand the limits and conditions of approved funding.
- Working with vendors to ensure service delivery and compliance with federal government requirements.
- Preventing and addressing situations in which agreements between vendors and clients do not align with federal policy requirements.
- Referring clients to service coordination when funding lapses, in order to ensure continued service.

Each of these tasks was incorporated in the FNHC's payment process based on challenges encountered during the SARF pilot project.

Contacting clients -The practice of contacting clients directly, prior to dispensing payment, emerged in response to situations in which direction from the FNIHB regional office did not align with family expectations or understanding. For

example, in one instance, the FNHC was directed to buy items and send them to a client. When the SARF manager contacted the client after purchasing the approved item, she was informed that the family already purchased the approved items on their own and would be submitting for reimbursement. Recalling that instance, the SARF Manager noted, that “put me in a pickle. One item was on sale, the other was special ordered. When something is special ordered, you can’t return it.” The FNHC ended up absorbing the cost of the purchased product and subsequently instituted the policy of contacting families prior to purchasing or processing payment.

The policy of contacting clients directly opened up opportunities to support families in understanding the limits of the funding and services they were provided. For example, the SARF manager related a conversation with the mother of a child whose request for a continuous glucose monitoring system had been recently approved. In that conversation, the SARF manager explained that the approval included funding for only one reader, which would allow her to track glucose levels. If the reader was lost or damaged a replacement would not be covered.

The FNHC’s approach to verification of SARF funding creates opportunities to build relationships and share information.

However, the SARF manager also informed the mother that, in the event of a lost or damaged reader, she could download an app that would allow her to monitor her child’s glucose levels on her cell phone. In addition, the SARF manager explained that the funding was only approved for two years, letting the mother know that she would receive an email informing when the approved funds were running out and that she would need to reapply for Jordan’s Principle funding at that time. This type of interaction helps to establish trust and build positive relationships with families, to ensure families understand the funding being provided, and to open lines of communication that may serve to prevent confusion and subsequent administrative challenges.

Working with vendors -The SARF Manager is also charged with critical task of ensuring good working relations with vendors. She succinctly highlighted the

importance of this task, stressing that if vendors are angry about or uncomfortable with payment processes, “they’ll deny services to the child.” In taking on the responsibility of processing SARF payments, the FNHC inherited any distrust or tension generated through past delays in payment or interactions with the complicated and restrictive federal payment process. Thus, the approach to engaging with vendors is shaped by a focus on building/rebuilding trust and working together to solve challenges. The goal is to ensure timely and appropriate services for families and children.

At the core of building relations with vendors is an understanding that when they offer services prior to payment, as is expected by the federal government, they take on risk. When this risk is pronounced, the SARF Manager adopts an approach in which she tries “to meet the vendors half way.” Take, for example, the case of a small company in Winnipeg that was asked to custom-make a tandem tricycle priced at \$14,000. Recognizing the risk to a company asked to produce customized equipment

A discretionary approach to SARF administration is necessary to efficiently meet the needs of the child within the federal government’s rigid payment policies.

that could not be easily resold, the SARF manager agreed to pay half the cost up-front and the other half upon delivery of the tricycle.

In other cases, she agrees to up-front payments because the industry standard is so clearly established that it would be difficult to find vendors willing to comply with federal guidelines. This is, for example, the case with daycare centres, which will often require up-front, monthly payment regardless of the number of days a child attends. In such cases, the SARF manager, and by extension the FNHC, exercises administrative discretion – a flexible approach to the interpretation and application of guidelines and policies.¹⁷ A discretionary approach is necessary to

The challenge of processing recurring services

Cases involving recurring services, such as ongoing tutoring for which vendors ask parents to sign a contract, involve layers of complexity that extend beyond that of one-time payments. The challenges of recurring services, and the need to regularly collect additional documentation in order to verify services, were highlighted in a case in which the FNHC received notice of an approval for ongoing tutoring services for a child living south of Edmonton. A franchise tutoring company was to provide services. The FNHC did not immediately receive any invoices from the vendor, and then received an invoice for the full amount, which the SARF manager processed and paid. The mother of the child subsequently contacted the FNHC to ask if she could use the funds allotted for tutoring with another vendor. When informed that the original tutoring company had already been paid for the full amount, the mother told the FNHC that her child had never attended any tutoring sessions. The FNHC followed up with the vendor and was informed that the mother had signed a contract for tutoring services that included a clause indicating that there would be no refunds, but that funds could be used for a sibling if desired. The vendor refused to refund payment. The FNHC took legal action that eventually resulted in the vendor agreeing to transfer services to any child at any learning center. The family was eventually approved for funds to pursue tutoring services with another vendor. Since that time, the FNHC has taken particular care to ensure that families understand the terms of payments that have been approved and to caution families against signing contracts that obligate them to pay for services that are not received, or not approved by FNIHB. They also implemented a policy of requiring submission of child attendance records prior to processing tutoring payments.

efficiently meet the needs of the child within the federal government's rigid payment policies.

Aligning vendor and federal policies –

As reflected in the tutoring contract example presented above, particular challenges can emerge when a family signs

a contract for recurring services. Based on experiences with tutoring and other recurring service contracts, the FNHC now takes extra care to ensure that families understand the terms of the funding that has been approved and to explain that payment cannot extend beyond the approved funding level or approved

services. Still, there are cases in which families sign contracts that do not align with the approved services. In those cases, the SARF manager must work with the family, the vendor, and FNIHB to negotiate and coordinate solutions. In some cases, these solutions involve the FNHC absorbing service costs or expenses related to pursuing legal settlement of a dispute with a vendor.

Referral to service coordination when service lapses - Finally, despite the care taken to ensure that families understand the terms of their funding, there are cases in which families do not realize that they need to reapply for funding because the approved funding is coming to an end. In these cases families are faced with the possibility of a disruption in needed services. In such situations, the SARF

manager refers families to the FNHC's service coordination staff, or connects with another service provider/coordinator that the family has previously worked with, to ensure continuation of services. The FNHC staff work closely with FNIHB focal points to expedite re-approval of the family's Jordan's Principle request.

In the initial years of the FNHC's SARF pilot project, the organization adopted a rigorous approach to payment verification that opened important channels for communication and relationship building. The FNHC's relational approach to the SARF process provides important opportunities to proactively address key challenges. The next section of this report examines features of the FNHC's SARF pilot that can support the ongoing development of SARF payment processes.



Mariah Black, Chief Old Sun School

SARF administration: A complex project

The relational approach to verification that is at the core of the FNHC's SARF administration lays a strong foundation for the ongoing processing of SARF payments. However, SARF administration is a complex project that also requires ongoing attention to, and efforts to address, tensions and challenges in the payment process. In this section we discuss the FNHC's use of administrative discretion to negotiate challenges on a day-to-day basis, as well as the organization's capacity to identify long term policy changes that would benefit First Nations children and families.

Learning from continuing challenges

The FNHC's relational approach to verification of services, and to supporting clients and vendors, is rigorous and comprehensive. But, this approach is challenged by an implementation of Jordan's Principle that is evolving over time, and involves 'case-by-case', discretionary decision making by focal points. As highlighted in the discussion of payments for educational assistants, on the next page, there are no clear and consistent standards for documentation of approved

Jordan's Principle funding. Variations in the funding approved in response to similar requests, differences in documenting the services provided and funds expended, as well as limits on the information about funding agreements that is shared with the FNHC all complicate the challenge of verifying services. These ongoing challenges highlight specific refinements of Jordan's Principle policies and processes that would better support the verification services and, in the long term, would also support more rigorous analysis of SARF expenditures.

Other challenges and unresolved questions that the FNHC has encountered in the SARF payment process pinpoint additional areas in which the revision of Jordan's Principle processes may better serve First Nations children and families. For example, based on experiences with the SARF administration process, FNHC administrators questioned the impact of federal insistence that Jordan's Principle should only pay for *services provided*. The SARF administrator raised the question of what should happen in the case of an allied health team that flies into a remote

The challenge of processing payments within an incomplete policy framework

The process of verifying Jordan's Principle funding for Educational Assistants (EAs) highlights the complexity of SARF administration. Education was the service category in which the greatest number of individual Jordan's Principle requests were approved in Alberta in 2019-20,¹³ with EAs making up a large component of those requests. Schools and school districts were initially approved to hire EAs as salaried employees but, after a shift in Jordan's Principle policies, an official from the national Jordan's Principle office met with school boards to inform them that EAs were only to be paid hourly, on the basis of services provided. While this officially standardized one aspect of payments for EAs, the shift in policies meant that school boards were faced with the challenge of informing salaried employees that they must now be paid hourly.

In addition, policies necessary to support a consistent approach to the payment of EAs were not put in place. The FNHC is charged with processing payment and verifying EA services, but the information provided to them by the Regional FNIHB office is meager; usually limited to an indication of whether a request is group/individual, a brief statement of the services approved (e.g. EA services: 1 EA to 3 children), and identification of the client and service provider. The invoices submitted vary greatly, both in terms of amount and details. Some invoices separately list the cost of salary and benefits, others simply list salary. There are, to the FNHC's knowledge, no common standards around the hourly rate for EAs, and the FNHC does not receive any information about the hours worked by EAs. The FNHC does receive attendance records for the students that EAs are assigned to work with, and also receives the EAs logs of the activities they did with children. But, without information about how many hours an EA is required to work, or how many hours they did work, it is not possible to verify that services were rendered in accordance with FNIHB approval. Similarly, it is not possible to assess whether submitted invoices represent the funding of the salaried positions originally approved or the hourly payment scheme that schools were subsequently asked to adopt.

“I need some structure that tells me – yes this, [but] not this. Because I need to be able to pass that information on to my staff.”

FNHC SARF manager

community in northern Alberta only to find that the families scheduled to receive services do not show up for their appointments. In this case, services are not provided, but significant resources – airfare, accommodation, and service provider time – are expended. Narrow interpretation of federal policies in this scenario would leave the vendor bearing the untenable costs of travel and staff time. Even if rules are interpreted in a way that ensures the costs of staff time and travel are covered by Jordan’s Principle, the focus on paying for services rendered poses significant challenges. This policy makes it difficult for organizations to cover the costs of administering services. It also fails to support the relationship building that prior research on the FNHC portrays as being central to effective service provision.^{2,3}

Similarly, experiences with SARF payments

highlight the need for formalization, clear documentation, and dissemination of strategies for resolving complicated situations that are currently managed informally. For example, the SARF manager noted that RSCs were confused about her approval of advance payment of day care costs when they were told advance payment was not allowed with Jordan’s Principle funding. She explained that this was an exception to the policy made because it was not possible to easily secure day care spots without advance payment. However, because this exception was not formally acknowledged in existing policies, the SARF manager risked the possibility of negative consequences associated with bending the limited Jordan’s Principle policies that are already in place. She also worried that families needing day care supports might get inaccurate information and be told that funding would only be provided if they could identify a day care that would accept payment for services provided. She noted, “I need some structure that tells me – yes this, [but] not this. Because I need to be able to pass that information on to my staff.”

SARF staffing: complex skills required

In the absence of a clear, formalized, and well disseminated framework for addressing complicated situations, the success of SARF administration rests on the skills and ingenuity of the SARF team. The complex mix of relational and administrative tasks involved in SARF administration calls for staff who have a broad range of complementary skills. Central to the administrative component of the work is an ability to organize and analyze case files and data. But the ability to effectively administer SARF funding also requires in-depth understanding of Jordan's Principle and ESC projects. The relational aspect of the work is also of critical importance. SARF staff must have experience working with vendors. They must also have the ability to work well with families, to translate complex policies in ways that families can understand, and to respond to family concerns and needs in supportive and respectful ways.

Finally, and perhaps most importantly, SARF administration requires a manager who is trusted by their organization *and* by federal representatives to navigate

“That’s how this relationship [with the federal government] works: I hold them accountable, they hold me accountable,”

FNHC SARF manager

complex situations, including those involving risk and liability, with competence. This trust is central to enabling the flexibility that is needed to resolve complex situations in which family understanding, vendor expectations and federal policy do not align. Both the FNHC and FNIHB must trust SARF staff to competently assess a situation, to explore and identify possible solutions, to consider the risks and benefits of each solution, and to implement the solution that best meets a family’s needs.

The right person for the job - In the case of the FNHC, the SARF manager brought with her the right set of skills and relationships for the job. Prior to joining the FNHC, she was a health services administrator at the Nation level. In this position she worked closely with vendors/service providers and families. After joining the FNHC, she helped oversee

the implementation and management of ESC services. Through this work she developed in-depth knowledge of Jordan's Principle, worked directly with families in need of Jordan's Principle funding, and established close working relationships with the ESC workers. She also took the lead in developing a strong, collaborative relationship with the regional FNIHB office and focal points. She sees these relationships as a key to improving the quality of service offered to First Nations families. For example, reflecting on the relationship with the regional FNIHB office, she notes, "That's how this relationship works: I hold them accountable, they hold me accountable."

Despite this positive framing, the relationship between the FNHC and the federal government is a complicated one. The FNHC has taken on responsibility for

People said to me, 'Why not just hire an accountant?' But I knew from the beginning, if we were going to do this, we needed to have the right person in that job.

FNHC Executive Director

work that was initially slated for the federal government, and has assumed a relationship-building function that the federal government did not previously play. Thus, the FNHC is central to ensuring the implementation of Jordan's Principle. However, the FNHC is not currently in position to directly inform policy change. The SARF manager summarized the situation succinctly: "By the time it gets to my desk and I see it, it's too late!" the service/support is already approved.

As a result, the SARF manager also has the difficult challenge of mediating tensions related to the inconsistency in decision making, unclear guidelines, and shifts in policy and procedures that continue to occur within the federal approach to Jordan's Principle. She must quickly develop contingency plans to respond to challenges emerging from unusual cases or to address the unanticipated results of changes in federal policy.

In addition, because the FNHC's work spans from the front end of the ESC model – supporting families, identifying needs, and making Jordan's Principle requests – through to payment, she must mediate tensions that arise, around Jordan's

Principle, within the FNHC. Reflecting on the different roles and responsibilities within the organization, she notes that ESCs are charged with building a case for services and supports that are precisely tailored to families' needs and preferences. She, on the other hand, is charged with processing payments within federal rules and guidelines, which sometimes don't align with those needs and preferences. She noted "Sometimes in meetings, even though we're on the same team, I feel like the separation is real." It takes ongoing communication and collaboration, as well as commitment to advocating for needed policy changes, to sustain a unified organization.

Gathering data to inform future policy development

Because the FNHC serves children and families across the entire Alberta region, from the point at which they request service coordination through to payment for services, it has a unique vantage point from which to identify and suggest solutions to ongoing challenges in the implementation of Jordan's Principle. Recognition of the potential for information about SARF payments, in

The goal of the FNHC is to link data on ESC cases and SARF payments to track the experiences of families from the point of first contact through to payment for services.

combination with the rich records that the FNHC keeps about ESC cases, to inform policy change shapes the FNHC's approach to collection and management of SARF records. From the perspective of the FNHC, the responsibility of keeping SARF payment records extends far beyond the technical task of maintaining auditable accounts.

The goal of the FNHC is to link data on ESC cases and SARF payments to track the experiences of families from the point of first contact through to payment for services. Because the ESC dataset includes more extensive quantitative and qualitative data than is collected by the federal government, it has the potential to give a much more comprehensive portrait of Jordan's Principle requests than is currently available. Public presentations of federal Jordan's Principle data typically include data on the number of requests submitted,

considered complete, and approved/denied, as well as the number of services/products and the level of funding approved. These data are sometimes broken down by service area.^{15,13} FNHC data includes this type of information as well as data on child and family needs identified, and existing services to which families were referred. It also includes to the full timeline for Jordan's Principle requests, a record of documents submitted, and SARF payment details.

Accordingly, FNHC data has great potential to inform policy development. Data housed by the FNHC might, for example, advance understanding of the trajectory of Jordan's Principle requests. Recently released federal data shows that, only 48% of individual Jordan's Principle requests that were submitted in fiscal year 2019-2020 were approved by the end of that fiscal year. The vast majority of the requests that were not approved were deemed to have insufficient information to be considered.¹² A subset of the submitted requests were initiated through the FNHC and, accordingly, in collaboration with the FNHIB regional office, it might be possible to compare of the trajectory of requests

Analysis of FNHC data could support policy changes that make the Jordan's Principle process more efficient. It could also support improved communication and education around what should be submitted along with a Jordan's Principle request.

advanced by FNHC to the trajectory for other requests.

In addition, careful examination of FNHC-supported cases could yield important information about:

- The types of requests that do and do not get considered for Jordan's Principle funding.
- The documentation common to requests that are considered and eventually funded.
- The true cost of supporting services in different regions of Alberta.
- The challenges faced in identifying needs, preparing Jordan's Principle requests, and processing payments across service domains.

This type of data analysis could support the development of new policies that make the

Jordan's Principle process more efficient and support improved communication and education around what should be submitted along with a Jordan's Principle request. Ultimately, this would ease the burden on families requesting Jordan's Principle funding and help ensure more equitable service access for First Nations children.

Establishing and maintaining a data system that realizes this potential requires that the FNHC address a number of technical challenges. These include coordinating with FNIHB to:

- Develop consistent procedures around the timing of SARF file transfers.
- Adapt the FNHC system as FNIHB makes changes in its case numbering protocols.

Other challenges involve establishing clear standards and data management protocols within FNHC in order to:

- Link case files from ESC to SARF.
- Distinguish between one time and recurring payments.
- Distinguish between children and needs addressed (one child might have multiple needs).

The FNHC must also adapt, and support FNIHB in adapting, data collection to capture emerging questions and organizational interests. Thus, for example, the SARF manager has recently started work to track payments for services for children who are newly eligible for Jordan's Principle under expanded eligibility criteria defined by the Canadian Human Rights Tribunal. "I figure they're going to ask us sometime!" she says, highlighting the forward-looking nature of the FNHC's approach to SARF payment and Jordan's Principle.

Given the complex nature of SARF administration, the FNHC takes a multi-layered approach to addressing challenges. Central to the FNHC's approach is the recruitment and retention of staff with the skills to navigate a complex policy environment. In the short term, mediating the tensions within the federal approach to Jordan's Principle requires staff to use administrative discretion to meet the needs of families and children, as well as ongoing communication to clarify policies and standards. In the medium term, the combination of FNHC's region-wide, comprehensive perspective, its rich database, and the strong relationships it

has nurtured give the organization great potential to advocate for policy changes that address the inconsistencies and tensions identified through the SARF pilot. In the long term, such advocacy holds the

promise of contributing to a framework of Jordan's Principle policies and processes that more efficiently meet the needs and serve the best interests of First Nations children and families.



Melissa Little Chief

About this report

This report is the result of a collaborative project that builds on relationships and knowledge developed through a prior project. In 2017, when the FNHC was first developing its ESC model, the organization partnered with the Children's Services Policy Research Group (CSPRG; then based at McGill University) on a study that documented the ESC model and its development. The final results of that study were published in 2019, and are available here:

<https://csprg.research.mcgill.ca/fnhc>. As that project finished, the head of the CSPRG (Vandna Sinha, now based at the University of Colorado, Boulder), the FNHC SARF manager (Julia Knott) and the FNHC Executive Director (Barry Phillips) began discussing further collaboration to document the newly established SARF pilot project. This report is the product of that collaboration.

At the core of work presented in this report is an ongoing dialogue, between Julia, Barry and Vandna, about the goals, vision, and implementation of the SARF pilot project. Between winter of 2019 and fall of 2020, Vandna and Julia engaged in regular conversation about developments in the SARF pilot project and about the policy and service context in which these developments took place. They exchanged documents and administrative data reports that tracked the

development of the SARF pilot project and the broader implementation of Jordan's Principle. Between October of 2020 and April of 2021, Vandna conducted a series of conversational interviews with Barry and Julia. These interviews allowed Vandna to formally document Barry and Julia's perspectives on, and experiences with, the SARF project. They also served as a forum for verifying details of project implementation and collectively surfacing questions and tensions to be addressed through ongoing discussion and the analysis of complementary data.

We worked together to collect, analyze, and review supplemental data needed to verify, clarify, and complement our collective knowledge about Jordan's Principle and the SARF pilot project. These data sources included SARF and ESC administrative data, presentations made by the federal government, other research on Jordan's Principle, and an interview with a FNIHB representative. The analysis of the SARF pilot project presented in this report is the result of an iterative process in which we collaboratively made sense of the gaps and contradictions in these data and crafted a narrative that captured the complexity of the SARF pilot project.

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Julia Knott joined the First Nations Health Consortium, as Regional Service Coordination Supervisor, in August of 2017. She started as the SARF Administration Manager in June of 2019. Julia is Cree, from Duncan's First Nation in Treaty 8. She previously worked as Director of Health for Western Cree Tribal Council and for Duncan's First Nation. Julia strongly believes that all First Nations people should have equal access to services, both on and off reserve, regardless of perceived jurisdiction.

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Barry Phillips has 40 years of experience serving in health-related fields such as hospitals, long term care administration, First Nations health and services delivery, and economic program development. He promotes the inclusion of the Social Determinants of health in policy and the actions needed to address the inequity and inequality of service to First Nations people.

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Vandna Sinha conducts research in partnership with social service agencies and community organizations. For the past 15 years, she has worked with Indigenous organizations in Canada to support the development of capacity to meet the needs of Indigenous children and families.

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