



NATIVE CHILDREN'S SAVINGS INITIATIVES IN THE UNITED STATES

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“*The mini-bank program has been an essential program within our organization. Since 1996, it has provided students with resources for financial awareness and the tools they need to build assets for their future.*”

*Angie Main, Executive Director
Native American Community Development Corporation*



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INTRODUCTION: THE STATE OF NATIVE-FOCUSED CHILDREN'S SAVINGS INITIATIVES IN THE UNITED STATES

A growing number of children and their families, of all ethnicities and economic levels, throughout the United States of America, are able to save for developmental assets such as post-secondary education and job training opportunities through the institution of financial vehicles commonly referred to as Children's Savings Accounts (CSAs). This publication focuses on providing important information related to the benefits of these types of savings accounts, and the related initiatives, for American Indian, Alaska Native, and Native Hawaiian youth. It also addresses the major challenges related to both designing effective CSA initiatives, and obtaining the resources needed to implement CSA initiatives that seek to serve Native youth, families, and communities. Additionally, the publication provides a historical timeline for Native CSA initiatives in the United States, and provides details about past and current CSA programs serving Native youth, in hopes of raising awareness of the many programmatic innovations established to date.

CSA initiatives writ large, in various adaptations, have existed in the United States for forty-plus years. Regarding the inception of Native-led CSA initiatives, minor's trust programs were first offered by Indian nations in the 1970s. The inception of Native-led CSA initiatives that align more closely with models now widely accepted as part of the current mainstream CSA movement could be traced to a "mini-bank" CSA program initiated in 1996, by the Native American Community Development Corporation (Montana). Currently, a variety of Native-led CSA initiatives serve a number of American Indian and Native Hawaiian communities.

One benefit of shedding new light on existing Native CSA initiatives is the sharing of the increased knowledge resulting from the development and implementation of such a number of Native CSA programs over time. These Native-led CSA programs generally have goals related to the unique needs and aspirations of youths in Native communities. Hopefully, gaining increased knowledge of Native CSA programs will also serve as a timely reminder to both the asset-building field and the nation as a whole that diversity and program innovation can coexist successfully in the account structure, program design, implementation, and administration of CSA initiatives.

Native-led CSA initiatives in the United States are

often designed in ways that vary from the most widely used model. Although this factor could be said to have some drawbacks, it could also serve to bolster Native-led CSA program strength. Atypical CSA initiatives are often creatively designed to meet the specific needs of the youth they serve. Key reasons for these variances in Native-led CSA initiatives include that: 1) Native communities have cultural understandings considered by their citizens to be essential towards strengthening tribal communities and economies; 2) Native communities tend to recognize a broader definition of assets, and a more holistic understanding of what defines "assets" for the needs of their citizens and communities; 3) Native communities, like many other "communities of color," frequently face issues related to historically-based political, structural, and cultural barriers and inequities; 4) Native communities often experience higher incidences of poverty and geographical isolation, including often having nominal access to legitimate financial institutions (non-predatory financial businesses); and 5) Native communities have traditionally experienced low levels of philanthropic giving in the United States.

Despite incidences of design differences with non-Native CSA programs, tribal minor's trust programs and other Native-focused CSA initiatives have been around long enough to have acquired a considerable amount of knowledge about their programs that could be used to inform and provide important lessons for the wider CSA field. As mentioned above, Native CSA programs have gained helpful knowledge related to some effective innovations in CSA program design, development, implementation, and administration — these innovations often being achieved under uniquely challenging circumstances. The lessons learned by Native programs could be used to inform current and future CSA efforts by tribes, nonprofits, and governments — at the tribal, municipal, state, and federal levels. Unfortunately, existing data on CSA initiatives focused on Native populations are often omitted from, or only lightly examined and addressed, in broad, more mainstream-focused, research efforts. A growing number of Native researchers, nonprofits, and advocacy groups are dedicated to alleviating this research deficiency. Towards this effort, the author hopes that this paper will be used to illuminate both the state of Native-focused CSA programs across the nation and the lessons learned from those initiatives to date.

As of 2019, there are at least nineteen known federally recognized Indian Nations and Native-led nonprofits that either have or are administering Native children's savings initiatives.¹ A map and list of all previous and current Native CSA initiatives is included at the end of this section, with a development timeline of the initiatives included in *Appendix I*, and a more detailed description of each of the initiatives included in *Appendix II*. In addition to CSAs, two other significant youth asset building savings initiatives (minor's trust accounts and youth Individual Development Accounts, or IDAs) have been initiated by tribal communities and Native-led nonprofits, and are designed in a way that is considered by some in tribal communities to be important pieces of a larger body of effective child savings initiatives in Native communities. General descriptions of these initiatives, and some examples, are also included in this paper.

Depending on the initiative, both Native and non-Native children's savings account administrators may refer to their initiatives, programs, or plans as Children's Savings Accounts (CSAs), Children's Development Accounts (CDAs), Youth Savings Accounts (YSAs), Kid's Savings Initiatives, or other similar names. The author's use of the various terms listed above is based on how Native-focused program administrators have labeled their particular initiatives and is interchangeable with "CSAs." Regardless of how these initiatives are named, the goals of Native-led CSA initiatives are to help Native youth create a nest egg of savings, develop financial capability, and cultivate an asset building mindset — through initiatives that are also designed to be relevant to the youth's cultural and social context and experience.

While fifteen of the nineteen Native children's savings initiatives documented in this paper were launched within the past nine years (2011 to 2019), other children's savings programs specifically serving Native youth go back to the 1970s when tribes first started offering tribal minor's trust programs. Of the Native CSA programs that are designed in a similar way to the current mainstream CSA movement, the Native American Community Development Corporation (Montana) has a twenty-four year track record with their mini-bank program — serving youth on the

Blackfeet Reservation since 1996; the Cherokee Nation Commerce Group (Oklahoma) started a CSA pilot program in 2005 (now completed); the White Earth Investment Initiative (Minnesota) started an at-birth savings account program in 2007; and the University of Hawai'i at Mānoa and the Hawai'i Alliance for Community-Based Economic Development (HACBED) (Hawai'i) started a Kids' Saving Initiative in 2008.² Over the years, Native asset building practitioners have implemented a variety of innovative CSA program models and have learned a number of valuable lessons that they are willing to share. As aforementioned, more information about the development timing of Native CSA initiatives may be found in the historical timeline in *Appendix I*.

The following list and map may be used to geographically pinpoint known Native CSA initiatives, and is complete to the best of the author's knowledge (although the list should not be assumed to be exhaustive). Lessons learned from these initiatives were used extensively to inform this paper. See the acknowledgments at the end of the paper for a listing of Native CSA program administrators and associates who offered valuable knowledge to the author for (and approval of) the descriptions the nineteen known programs found in *Appendix II*. (*See the list and map of the nineteen known Native children's savings initiatives on pages 6 and 7*).

THE GROWING VALUE OF NATIVE-FOCUSED CHILDREN'S SAVINGS ACCOUNT (CSA) INITIATIVES FOR NATIVE YOUTH, FAMILIES, AND COMMUNITIES

Native CSAs provide a variety of benefits to youth, families and communities. Native CSAs assist youth in accessing mainstream asset building accounts at banks or credit unions, strengthening savings habits, and creating a nest egg of savings for a variety of current and future development purposes. For Native children, personal development might include expenses related to tribal customs and functions, such as artistic initiatives, traditional food and land preservation efforts, and participation in powwows, reunions, and potlatches. Additionally, such accounts, depending upon how they are structured, can help youth and their

¹The author used personal knowledge of these programs to reach out to Native children's savings initiatives. She also asked professional contacts for any information related to Native children's savings initiatives that might exist outside of her personal knowledge. Mrs. Finsel also spoke with a number of administrators of Native asset building initiatives other than CSAs (such as Individual Development Account administrators), to see if they were also offering children's savings accounts as part of their programs. The author counted as one program, an initiative administered and funded by the Oklahoma Native Assets Coalition, Inc. (ONAC), that has twenty-one tribal and Native-led nonprofit outreach partners, as one initiative in this paper (while including descriptions of all the partner contributions to that program).

²This historical information is based on communications with Angie Main, Native American Community Development Corporation Executive Director; Shay Stanfill, Cherokee Nation Small Business Assistance Center Director; Sarah Castro, Midwest Minnesota Community Development Corporation/White Earth Investment Initiative Development Services Coordinator; Dr. Michael Cheang, Associate Professor, Department of Family and Consumer Sciences, Hawai'i at Mānoa; and Brent Kakesako, Executive Director of HACBED, October 2016.

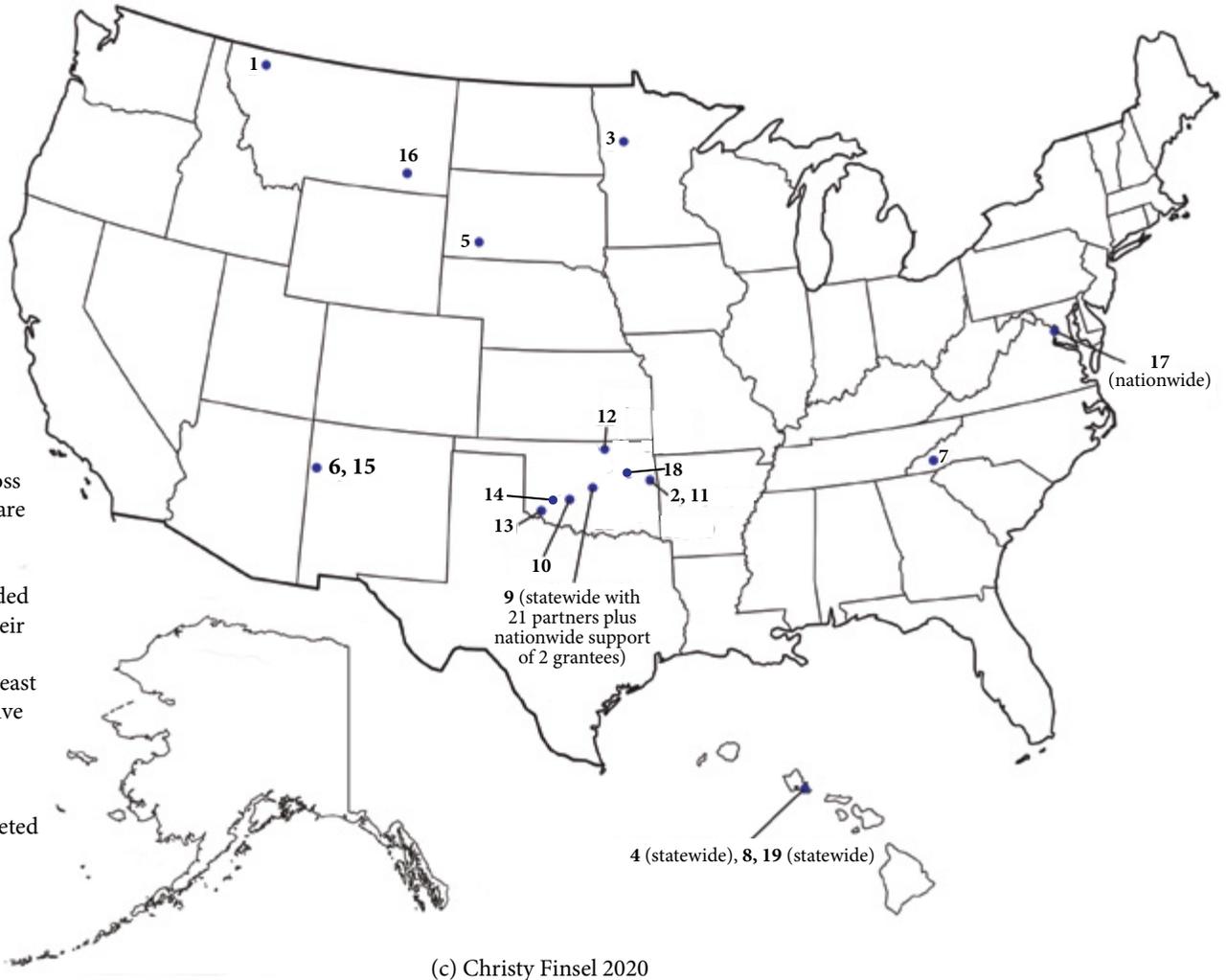
List of Native Children's Savings Initiatives

(Numbers correspond to the map on the opposite page.)

1. Native American Community Development Corp., Blackfeet Mini-Bank Program
2. Cherokee Nation SEED Program
3. White Earth Investment Initiative's Children's Trust Fund
4. The University of Hawai'i at Mānoa and the Hawai'i Alliance for Community Based Economic Development Kids' Saving Initiative
5. Lakota Funds Child Development Account Program
6. First Nations Development Institute, Bureau of Indian Education School at Wingate High School, and Gallup Catholic High School Pilot Program
7. Sequoyah Fund Kituwah Savings Program (*M)
8. Hawai'i Alliance for Community Based Economic Dev., and Kōkua Kalihi Valley Youth Savings Initiative
9. Oklahoma Native Assets Coalition, Inc. (ONAC) Children's Savings Account Program*
 - Mvskoke Loan Fund (*AOP)
 - Eastern Shawnee Tribe of Oklahoma (*AOP)
 - Osage Financial Resources, Inc. (*AOP)
 - Cherokee Nation Child Support Services (*AOP)
 - BeLieving In Native Generations (BLING) (*AOP)
 - American Indian Resource Center, Inc. (*AOP)
 - Scholarship Foundation Program of the Muscogee (Creek) Nation (*AOP)
 - Pawnee Tribe Title VI Elderly Meals Program (*AOP)
 - Citizen Potawatomi Community Development Corporation (*AOP)
 - Ponca Tribe Head Start (*AOP)
 - Housing Authority of the Seminole Nation (*AOP)
 - Osage Nation Financial Assistance Department (*AOP)
 - Modoc Tribe of Oklahoma, Housing Authority (*AOP)
 - Housing Authority of the Peoria Tribe of Indians of Oklahoma (*AOP)
 - Wyandotte Nation (*AOP)
 - Absentee Shawnee Housing Authority (*AOP)
10. Wichita and Affiliated Tribes (*M/AOP)
11. United Keetoowah Band of Cherokee Indians (*M)
12. Kaw Nation (*M)
13. Ranch Good Days, Inc. (*M)
14. Kiowa Tribe (*M/AOP)
15. First Nations Development Institute and Gallup Central High School Pilot Program
16. Chief Dull Knife College Financial Savvy Program (*M)
17. NAT\$VE in the BANK Initiative
18. Kathryn M. Buder Center for American Indian Studies at Washington University in Saint Louis and American Heritage Bank Youth Savings Account Opening Project
19. Hawaiian Community Assets Youth Match Account Program

* ONAC = (M = ONAC-Funded Children's Savings Initiative Mini-Grant Awardee) (AOP = Account Opening Partner)
(M/AOP = Both ONAC-Funded Children's Savings Initiative Mini-Grant Awardee and Account Opening Partner)

Native Children's Savings Initiatives



Additionally, across the nation, there are an estimated sixty-five minor's trust funds provided by tribes, from their gaming revenue. There are also at least twenty-three Native youth Individual Development Account (IDA) programs (completed pilots and active programs).

The numbers on this map correspond to the list of initiatives on the facing page.

For more information, or to contribute additional information on CSA experiences in Native communities (particularly information related to CSA initiatives that may have been unintentionally omitted), please contact Christy Finsel at cfinsel@oknativeassets.org.

families to pay for school clothes, medical and extra-curricular expenses, and for other savings goals of the child's choice.

The goal of acquiring a post-secondary education is a key priority for many Native families. Given the need for funding for college and trade school, seven of the nineteen Native CSA initiatives detailed in this publication have required that youths save for higher education through their CSAs. A focus on education will hopefully address the college graduation gap for tribal citizens. As of 2018, according to the American Indian College Fund, only 14 percent of American Indians have a bachelor's degree.³ As of 2015, for Native Hawaiians, 25 years or older, living in the State of Hawai'i, only 11.6 percent have a bachelor's degree and only 4.8 percent have a graduate or professional degree.⁴ While there are a variety of college scholarships available for secondary school students across the United States (including a significant number of Native students through their tribes), we find, anecdotally, that available scholarships are not always applied for by Native youth and their families due to a belief that college is not truly an option for them.⁵

In research published by the *Children And Youth Services Review* in March 2013, researchers found that "A low- and moderate-income child who has school savings of \$1 to \$499 prior to reaching college age is over three times more likely to enroll in college and four times more likely to graduate from college than a child with no savings account."⁶ It is hoped that opening and funding college savings accounts for Native youth may reduce the aforementioned "graduation gap" and change tribal youths' aspirations and expectations

regarding college attendance and completion. With new and more optimistic outlooks about future goals, Native youths' aspirations towards future employment options might also be impacted in a positive way.

There are additional ways that CSAs may benefit Native communities: based on early research findings related to their SEED for Oklahoma Kids (SEED OK) policy test, the Center for Social Development at Washington University in St. Louis has reported that Child Development Accounts (CDAs) in the Oklahoma SEED initiative "improved mothers' expectations for their children's education" and "improved disadvantaged children's early social-emotional development" among other positive findings.⁷

CSAs have become a proven way to offer assistance to families, in general, for starting to save for post-secondary education costs. However, CSAs could help tribal citizens, in particular, to better manage "expectations" about who is going to pay for education-related costs. According to data from a 2017 report from the FINRA Investor Education Foundation and First Nations Development Institute, 32 percent of American Indian and Alaska Native respondents reported that they, themselves, were not setting aside money for their children's college education.⁸ This represents the lowest college savings rate across all major U. S. populations. (*See the footnotes below for additional information*).

Anecdotally, several tribal representatives in Oklahoma have told the Oklahoma Native Assets Coalition, Inc. (ONAC) that they hear from tribal citizens about how many families assume their tribe will help pay for their children to attend college — which is not often the case. With the higher costs of college tuition, and

³American Indian College Fund. American Indian College Fund: Education Is the Answer. 2018. Accessed October 19, 2018, at <http://collegefund.org>.

⁴OHA Native Hawaiian Data Book 2015 - Table 4.51 Update (Educational Attainment of Native Hawaiians in the United States and Hawai'i: 2014). <http://ohadatabook.com/T04-51-15u.pdf>.

⁵Personal communications between author and tribal program directors.

⁶Elliott, W., III, Song, H-a, and Nam, I. (2013). Small-dollar children's saving accounts and children's college outcomes by income level. *Children & Youth Services Review*, 35(3), 560–571. doi:10.1016/j.childyouth.2012.12.003.

⁷Beverly, S., Clancy, M. and Sherraden, M. (2016). The Early Positive Impacts of Child Development Accounts. CSD Research Brief 15-08. Available at <https://csd.wustl.edu/15-08/>. See also Huang, J., Beverly, S.G., Kim, Y., Clancy, M.M., & Sherraden, M. (2019, October). Financially Vulnerable Families Reap Multiple Benefits from Child Development Accounts. CSD Research Brief 19-40. Available at <https://csd.wustl.edu/19-40/>

⁸Deweese, S., and Mottola, G. (2017). Race and Financial Capability in America: Understanding major U. S. populations. Available at <http://www.usfinancialcapability.org/downloads/Native-American-Experience-Fin-Cap.pdf>. According to a September 26, 2017, email communication between the author and Sarah Dewees, formerly of First Nations Development Institute, to better understand this data, it is helpful to note that "earlier research has documented high levels of financial distress for AI/AN people—in fact, in some regions of the country, AI/AN are by far the poorest population groups (U.S. Census) (November 2015). American Indian and Alaska Native heritage month: Profile America facts. CB15-FF.22. AI/AN women (especially those with dependent children) are more likely to experience higher poverty rates than AI/AN men (Eichner, A., & Gallagher Robbins, K. (2015). National snapshot: Poverty Among Women and Families, 2014. Washington, DC: National Women's Law Center). Previous research suggests that AI/AN people are less likely to have intergenerational role models and are less likely to be exposed to financial concepts, or economic socialization, due to higher levels of intergenerational poverty (See Dewees, S. and Mottola, G. (2017). Race and Financial Capability in America: Understanding the Native American Experience. FINRA Foundation Issue Brief. See also Anderson, W., Brantmeier, N., Jorgensen, M., & Lounsberg, A. (2010). Financial education in South Dakota schools with high Native-enrollment: Barriers and possibilities. Longmont, CO: First Nations Oweesta Corporation). This previous research suggests that as a result, fewer Native American families have resources to save for educational expenses. In addition, financial knowledge for many AI/AN people is lower than the national average."

some tribes serving growing tribal youth populations totaling between several hundred to well over 20,000 youths, per tribe, many tribes are looking towards a supplementation strategy; assisting their citizens in utilizing a more viable way to save for their children's education, including participation in a children's savings initiative.

NATIVE-FOCUSED CSA INITIATIVES ARE GENERALLY DESIGNED TO BE CULTURALLY RELEVANT AND MEET THE SPECIFIC NEEDS OF TRIBAL YOUTH

Native children's savings programs are designed to address specific needs of both their youth and their local community or nation. Such customization seems necessary, since the 574 federally recognized tribes, plus state recognized tribes, and Native Hawaiian communities, are diverse in location, customs, and beliefs.⁹ Culturally relevant programs have been shown, in general, to increase Native community buy-in. Definitions of assets and consensus on effective ways to use assets in these communities is also diverse. As with many CSA initiatives, program design features for tribal initiatives may vary according to the goals of program leaders and partners, target markets, funders, length of savings and program duration, and the specific asset building goals of youths served. Native CSA program design flexibility includes:

Varied Savings Goals — Seven of the nineteen Native CSA programs were created expressly to assist youths in saving for education expenses, while the other twelve programs allow participants to choose their savings goals. Given the poverty that the families they serve are experiencing, one of the CSA programs — administered by Lakota Funds (South Dakota) — also allows participants to save for both short- and long-term goals. Lakota Funds assists Native youth and their families to save for both current necessary asset purchases (school clothes for elementary school) and future goal purchases (saving for college).¹⁰ Such a program design option can provide the needed resources to successfully support Native children through their elementary and

middle school years, while also assisting them to save for college costs; to promote the idea with children and their families that college is an option.

Expanded Financial Literacy Objectives — As with the broader field of CSA initiatives, Native children's savings practitioners frequently provide some type of financial education, as part of their program, to enhance the financial literacy and capability of their participants. Some Native-led programs use Native-specific financial education materials that they, or other Native-focused entities, have created, making the information more specific to and relatable with their target audience. For example, at CSA account opening events, ONAC provides basic Native-specific financial education for the youth, while also distributing investor education booklets to the parents that include important information about how to manage a 529 college savings account. ONAC also hosts Native-specific financial education train-the-trainers for its tribal and Native-led nonprofit partners so that they, in turn, may offer financial education and credit counseling to adult tribal citizens (such as the parents completing CSA applications for their children).

Connecting CSAs to Both Banking Access and 529 Savings Plans, Often in Culturally Relative Ways — Through these programs, Native youth and their parents or guardians, who previously may not have had any experience with financial institutions (or few positive experiences), are being encouraged to connect with both mainstream financial institutions (banks or credit unions), or college and trade school savings vehicles (such as a 529 savings plan), while still appreciating and maintaining their own cultural heritage of saving and investing.¹¹ The Native American Community Development Corporation Blackfeet Mini-Bank Program (Montana) has successfully facilitated "mini-bank" learning opportunities through their savings programs.¹² This process of connecting cultural practices to modern

⁹Finally! At long last, Little Shell get federal recognition. December 20, 2019. Retrieved from <https://www.greatfalls Tribune.com/story/news/2019/12/20/montana-little-shell-tribe-chippewa-indians-federal-recognition/2439763001/>. See also: <http://www.ncai.org/news/articles/2019/12/27/ncai-response-to-usage-of-the-term-indian-country>.

¹⁰Garcia-Clifford, Yolanda. Personal communication. 23 September 2016.

¹¹According to Questions and Answers provided by the IRS, 529 plans were created by Congress in 1996 and are "named after section 529 of the Internal Revenue Code." A 529 plan is "a plan operated by a state or educational institution, with tax advantages and potentially other incentives to make it easier to save for college and other post-secondary training for a designated beneficiary, such as a child or grandchild." Internal Revenue Service. *529 Plans: Questions and Answers*. August 11, 2016. <https://www.irs.gov/uac/529-plans-questions-and-answers>.

¹²Main, Angie. Personal communication. 21 September 2016.

banking practices encourages Native youth and their families to find asset-building synergy between two cultures.

In 2015, as a means of looking for ways to incentivize accounts that could be integrated with other supports offered to the adults in the families they serve, the Hawai'i Alliance for Community-Based Economic Development (HACBED, serving Native Hawaiians in Hawai'i) joined with the County of Hawai'i Office of Housing & Community Development to implement an incentivized saving initiative where they offered a direct deposit program for participants of the Housing Choice Voucher and Tenant Based Rental Assistance program. This was a Bank On 2.0 Pilot for Hawai'i County.

In 2019, ONAC launched a Native Bank On initiative to help Native families in Oklahoma (and eventually beyond Oklahoma) to connect to safe and affordable transactional bank accounts. In 2020, ONAC will work to connect financial institutions that offer Bank On certified accounts (no overdraft fees, transparent monthly fees, and a maximum opening account deposit of \$25 per account) with several ONAC tribal CSA partners and program participants for opening accounts at CSA events. If Native CSA programs are choosing a financial institution to hold the CSAs, they could request assistance from ONAC to find Bank On certified account options in their geographic area. In addition to some Native CSA programs supporting greater Native banking access, other Native CSA programs that utilize 529 savings plans are often introducing Native families to these types of invested accounts to help them build their assets.

Linking CSAs to Integrated and Multi-Generational Approaches to Asset Building

— In addition to CSAs, at least seven of the Native CSA programs mentioned in this paper also promote asset-building programs geared to adults in the families. The additional asset-building programs and services offered vary per tribe, or Native-led nonprofit, and may include: Bank On, Voluntary Income Tax Assistance, small business development services, family Emergency Savings Accounts, loan programs, adult Individual Development Accounts (IDAs), down payment assistance, homebuyer education, foreclosure prevention, credit

counseling, and workforce development. The targeted adults may access a variety of asset building tools when they open CSAs for their children.

Opening Accounts for All Youths in the Family

— Tribal citizens highly value family and communal assets as well as individual assets. Thus, when funding is available, at the CSA account opening events hosted by ONAC and its twenty-one tribal and Native-nonprofit program outreach partners, ONAC funds accounts for all the youth in the families served, even if the invitation to participate was made to the child in the family who, for example, attends a tribal Head Start program. Parents have expressed a desire for all of their children to have access to a CSA, and for them to think more positively about graduating from college. ONAC funds CSAs for additional children in participating families, up to age twenty-two.

Establishing and Expressing A Broad Articulation of Assets Through CSAs

— Tribes and Native-led nonprofits continue to communicate and define, with their tribal youth, the connections between the various kinds of assets that are important for building and maintaining prosperous tribal communities. Related to current Native-focused children's savings programs, the financial education materials utilized by a number of tribal advocacy entities such as First Nations Development Institute (FNDI) (National), the Oklahoma Native Assets Coalition, Inc. (ONAC) (National), Hawai'i Alliance for Community-Based Economic Development (HACBED) (Hawai'i), Lakota Funds (South Dakota), White Earth Investment Initiative (Minnesota), Sequoyah Fund, Inc. (North Carolina), Chief Dull Knife College (Montana), and Hawaiian Community Assets (Hawai'i), promote a broad and traditional concept and understanding of Native assets.¹³

For example, at CSA account opening events ONAC (as is typical with many other Native CSA programs) recognizes a generally accepted tribal concept that Native assets are understood to be more than money or monetary investments. ONAC affirms that Native assets include other types of saving and investments, such as learning and preserving Native language, strengthening

¹³Sherry Salway Black, formerly of FNDI, articulated such an understanding of Native assets in 1994. See Salway Black, S. *Redefining Success in Community Development: A New Approach for Determining and Measuring the Impact of Development*. Medford, MA: Tufts University, 1994.

tribal sovereignty, engaging in many forms of education, and establishing food security — as well as reclaiming and utilizing land, building homes on Native lands, and establishing Native-owned businesses.¹⁴ ONAC recognizes these Native principles at CSA account opening events. These events include an ONAC-funded Native arts project, where youths participate in a discussion of assets they think are of value to their family and community. The discussion is followed by encouragement for them to illustrate the assets they value and, if possible, to hear from a local Native artist about the value placed in traditional artwork by Native communities. At many of the same account opening events, ONAC also gives the youth organic seed packets to illustrate the asset building value of promoting food cultivation and food sovereignty. Over several years, with parental permissions, ONAC has created desk calendars, using artwork by Native youths who opened CSAs, for use in promoting additional discussions about Native asset building with the youth throughout the year.

Another example of this same line of approach comes from HACBED, in Hawai'i. They based their children's savings initiatives on an asset policy framework that notes "wealth is more than the accumulation of money and goods — it [also] relates to 'ohana, [which is] 'the quality of our relationships, the resilience that comes through the support of community networks, and our ability to share and leave a legacy for future generations.'" HACBED also notes, "For island families and communities, wealth is also rooted in the concept of *ho'owaiwai* (to enrich) — the time tested indigenous wisdom of Native Hawaiians that to be, thrive, and prosper in these islands, we must hold sacred our interrelationship and interdependence with *'āina* (that which feeds us)."¹⁵ This culturally relevant approach to an understanding of assets and the various asset building frameworks for Native peoples has significantly impacted current approaches by Native communities towards the development of Native children's savings initiatives.

CHOOSING THE BEST PLACE TO HOLD NATIVE-FOCUSED CSAS: 529 SAVINGS PLANS OR FINANCIAL INSTITUTIONS (OR BOTH)

Sovereign nations, Native-led nonprofits, and Native asset-building coalitions choosing to design and implement CSA programs face the decision of whether to hold the accounts in 529 savings plans or in local financial institutions. Depending upon the goals of the programs, factors such as the asset needs of youth in their communities, various state asset limit requirements for means-tested programs, funder requirements, and restrictions imposed by other initiative partners, must be considered as program administrators determine which financial vehicle would be best for holding their particular CSA accounts. Native CSA administrators could explore offering both options: a shorter-term savings option where youth save money for immediate needs in a traditional bank or credit union account, and a longer-term savings option for such assets as post-secondary education expenses, achieved through financial vehicles such as 529 savings plan accounts. The following information might be of assistance when considering the type of savings vehicle that best serve Native-focused CSA programs.

Key Factors to Consider Related to Holding CSA Funds in 529 College Savings Plans

Funds held in 529 college savings plan accounts can be used only for policy approved educational expenses. 529 college savings plan accounts are intended to be used for policy mandated "qualified" tuition and educational expenses at accredited colleges and trade schools or private or religious elementary and secondary schools. Additionally, the newer Setting Every Community Up for Retirement (SECURE) Act (passed at the federal level on December 20, 2019) allows for certain changes to the federal tax treatment of qualified education loans and apprenticeships. This means that 529 account owners will not have to pay federal tax on 529 withdrawals for such expenses. (As of January 2020, 529 boards are reviewing how their state laws might currently align, or not align, with these federal legislation changes; requiring CSA program administrators to monitor state

¹⁴Finsel, C. *ONAC Children's Savings Account Activity Booklet*, 2015. In the Native asset building field, earlier articulations of an asset building framework are attributed to Sherry Salway Black, previously with First Nations Development Institute; First Nations' *Building Native Communities: Financial Skills for Families* curriculum; and research conducted through the Kathryn M. Buder Center for American Indian Studies and Center for Social Development at Washington University in Saint Louis.

¹⁵Hawai'i Alliance for Community-Based Economic Development. *Hawai'i Island Kids Saving Initiative: A Pathway to Family Financial Empowerment*, p. 5. July 2012.

tax treatment of 529 funds for apprenticeships and student loan repayments).¹⁶ In terms of tax treatment, qualified expenses at the federal level now include tuition, room and board (with limitations), fees, books, supplies, and equipment required for the enrollment or class attendance costs of a beneficiary at an accredited university, college, apprenticeship, and vocational programs. Computers, internet access fees, printers, and software are considered allowed expenses, along with educational expenses directly related to those students with special needs.¹⁷ Non-qualified withdrawals are subject to taxes. Research indicates that CSA programs (Native and non-Native-led) often utilize 529 savings plans, considering them an effective way to hold deposits over time, with higher potential for savings growth.

CSAs opened in a 529 college savings plan offer specific benefits to account holders.

Benefits offered include: certain tax benefits related to both deposits and interest earned on account growth (if the account holder has a federal and/or state tax liability); assistance in connecting account holders to mainstream colleges and trade schools; and allowing account holders to receive account statements and access their account information online.

For those Native parents who pay state taxes, they may get additional tax benefits for contributions made to 529 accounts, and receive a tax exemption on the funds used for approved purposes.¹⁸ All tribal members do not pay state taxes, and so any state tax benefit may or may not be relevant to them as Native CSA program participants.¹⁹ Contributions made to 529 plans are not deductible on federal tax returns, but 529 investment earnings grow tax-deferred. Distributions used to pay for the

beneficiary's qualified educational expenses come out federally tax-free.

Significantly, for many of the parents or legal guardians of Native youth, opening a children's savings account is the first opportunity they have had to hear about the benefits of 529 college savings plans — or how to connect to such plans.

Funds held in 529 savings accounts have no time restrictions for use and can be transferred to another family member. If a young adult decides that college or trade school is not for them, they may keep the funds in their account for use when they are older (there is no expiration date on the funds). Also, the beneficiary of the account (the youth) could decide to later transfer the funds to another qualified beneficiary such as their own children or another family member for approved uses of the account funds without incurring taxes or penalty.²⁰ If a student does not use all their funds for undergraduate study, they can save the funds for future or graduate school expenses. Beneficiaries that attend military academies or receive full scholarships, having no need for the funds in their 529 account, may withdraw certain amounts from the accounts that would not be subject to the 10% penalty, although they would pay taxes on the earnings portion of the withdrawal.²¹ Also, as of December 20, 2019, the SECURE Act changed the federal tax treatment of student loan repayment at the federal level so that any of the beneficiary's siblings could use 529 funds to repay up to \$10,000 of their student loans.²² Currently, at the state level, various 529 college savings plans are reviewing these federal changes with their boards and state attorneys to determine how these changes at the federal level might impact state tax deductions and if

¹⁶See <https://www.ok4saving.org/buzz/?id=1425>. Also, see Setting Every Community Up for Retirement (SECURE) Act, Sec. 302. Expansion of Section 529 Plans (p. 642). <https://www.congress.gov/116/bills/hr1865/BILLS-116hr1865enr.pdf>.

¹⁷See www.ok4saving.org.

¹⁸See each 529 plan for more information. As an example, here are the tax benefits associated with the Oklahoma 529 Savings Plan for Oklahoma residents: <https://www.ok4saving.org/plan/details.shtml#details-10>.

¹⁹As an example, one of the Native CSA programs in this publication, Chief Dull Knife College and the People's Partner for Community Development, notes that a number of their student parents *do not* pay Montana state taxes. (If Northern Cheyenne tribal members earn all their income on the Northern Cheyenne Indian Reservation, then they are not required to pay state taxes — and the same applies to students who have tribal membership with other tribes if they reside on their own tribe's reservation land).

²⁰See each 529 plan for more information. The information may be found under FAQ related to changing the beneficiary.

²¹See <https://www.ok4saving.org/help/faq/?q=602> and <https://www.ok4saving.org/plan/details.shtml#details-11>.

²²<https://www.savingforcollege.com/article/new-law-allows-529-plans-to-repay-student-loans>. While the SECURE Act was recently passed, and changes may be made to the law, based on the article noted above and federal tax treatment of student loan repayment, the author currently understands that if you have a family with five children, and one of the children (a 529 account beneficiary) does not use \$40,000 of their 529 funds in their 529 account, the account owner (a parent) could work with their 529 plan administrator to take \$40,000 in 529 distributions to pay up to \$10,000 in student loan payments for each of their other children.

distributions for loan repayment would qualify at the state level based on their state statutes.²³

Key Factors to Consider Related to Holding CSA Funds in an Account at a Financial Institution

Funds held in a regular savings account at a bank or other financial institution may be used for any goals or uses the program determines eligible. If accounts are held in a financial institution, such as a bank or credit union, Native CSA program administrators may determine the specific asset goals and purchases Native youths may make with their CSA funds — such as other school-related expenses which are not allowed to be covered by a 529 savings plan, or whatever other type of asset purchase they choose — without savers incurring penalties.

Savings account balances in financial institutions will accrue only the percentage of interest that regular savings accounts earn at the time of deposit (which currently is not a very large amount). Earnings on the savings will be low enough that they most likely will not impact the tax liability of the owner.

Youths with CSA funds held in a regular savings account at a financial institution may benefit from a positive first-time banking experience. When CSA funds are held at a financial institution, such as a bank or credit union, and the youths have positive interactions with staff at the institution (at on site account openings and the making of deposits) they may become more comfortable with mainstream banking services, potentially becoming lifelong customers of such institutions. A positive banking relationship will also provide them with a federally insured account and enable them to resist predatory check cashing businesses and predatory lenders. Positive relationships with financial institutions may also guide youths toward eventually establishing positive credit histories — improving chances for obtaining conventional loans for life development purposes such as car purchase, homeownership, and small business development.

Common Questions Regarding Choosing the Account Location of CSA Funds

If a concern of the CSA program administrator is that parents might withdraw CSA funds for

their own use, could the administering agency control the funds in the accounts? Yes, if CSA funds are held in a 529 college savings plan account that an agency has ownership of (instead of a parent-owned account), program administrators (rather than parents) control the funds in that account. Also, if CSA funds are held in custodial accounts in a regular savings account at a financial institution, with the administering agency as the custodian on the account, the administrator controls any withdrawals of the funds.

When tribes or Native nonprofits choose to administer the accounts and control the use of the funds, they face the responsibility of administering the funds for the lifetime of the accounts (possibly up to twenty-two years or more if accounts are opened for infants and the funds are intended to support them through college) and absorbing the associated long-term administrative costs. Currently, a significant number of Native CSAs have less than a few hundred dollars in them. Native program administrators would be wise to do a cost-benefit analysis to determine the potential costs related to controlling the release of the CSA funds over many years. If this is not feasible, the tribe or Native-led nonprofit may choose to have parents own or control the accounts over the longer-term (for their child's benefit). Depending upon the age of the youth, the tribe could also choose to determine if the financial institution offers an account where the youth could control their funds — although this would likely require some program controls.

Should it affect the decision of where to hold the accounts if the administering agency has established that a primary program goal is to have the funds grow in the CSA as rapidly as possible and to be used specifically for college savings? State 529 college savings plans primarily serve the savings goal of supporting post-secondary education for the account beneficiary (the youth) by growing the funds in an investment environment, at certain investment rates (depending on the account owner's chosen level of risk). These accounts also have desirable tax benefits for the account owner. The account balances in 529 plan accounts are likely to grow at a considerably higher rate than in a regular savings account

²³For three examples of 529 plans that are reviewing how their state statutes align with the federal legislation see: <https://www.aboutchet.com/buzz/?id=1421>, <https://www.ok4saving.org/buzz/?id=1425>, and <https://www.scholarshare529.com/buzz/?id=1419>.

because the funds are invested in the stock market — as opposed to being held at financial institutions that traditionally offer low interest rates on savings accounts.

However, there is earnings volatility associated with investing in a 529 plan due to stock market fluctuations. Funds held in a 529 account may lose as well as gain value depending on the risk level of chosen fund allocations (chosen by account owners) and the economy, meaning that the level of risk associated with the investments may impact the earnings. Account owners are generally offered a variety of account allocation options when opening the accounts. They may also change the level of risk they are comfortable with, over time, by adjusting chosen allocations over the lifetime of the account. There are some costs associated with these accounts, which vary by plan. Prospective account administrators and owners would be wise to find and compare costs when choosing a 529 plan. Research is mostly unavailable as to the safety of financial investments in the plans over time.²⁴ However, after over twenty-plus years in existence, there is no evidence that, overall, 529 savings plans are not a safe and effective college savings tool to grow college savings for youth.

POTENTIAL IMPACTS OF OWNING CSAS ON THE FINANCIAL AID ASSESSMENTS OF NATIVE YOUTHS

Given rising tuition costs, it is important for Native families to understand the direct implications of how the ownership of a college savings account (or who is the owner or custodian of such an account) impacts financial aid assessments for Native students. Financial aid assessments are made by the chosen educational institution. The financial aid assessment formulas of many schools are complex and involve factors such as 1) parent's and/or child's earnings and assets, 2) available government need-based aid, 3) institutionally available need-based aid, 4) student work opportunities, 5) scholarships (need-based or otherwise), 6) student loans, and 7) whether or not the potential student is willing to make an early-in-life attendance commitment to the school aid is sought from.

Since 2015, the author of this paper has conducted research to explore which CSA plan or program design options have negative impacts on the financial aid assessments of Native students. As part of this research, the author surveyed eleven higher education institutions.²⁵ She soon discovered that there is a need for more communication and information-sharing between CSA and financial aid administrators, as well as other researchers and policymakers, since the information she garnered was sometimes both conflicting and confusing. While this research was limited, the body of data the author collected from both public and private educational institutions raised concerns to her that agency-owned CSAs may more negatively impact student financial aid assessments for students who have assets that will be included in the Expected Family Contribution (EFC) formula. However, the degree of impact may depend on a variety of factors.

From a financial aid perspective, according to a 2017 policy brief published by the Center for Social Development at Washington University in St. Louis, in regard to the Free Application for Federal Student Aid (FAFSA) and the EFC calculation, “assets do not affect the EFC for students whose parents have AGIs below \$50,000 and who meet at least one of three other qualifications: 1) someone in the parents’ household received federal means-tested public assistance within the previous two years; 2) the students’ parents were eligible to file an IRS Form 1040A or 1040EZ (as of the 2018 tax year these forms have been virtually eliminated, and the information required for this calculation has been consolidated into form 1040); or 3) a parent is a dislocated worker. The students who qualify under the above qualifications, are granted a simplified EFC formula (which disregards all parent and student assets) or, if parent income is \$25,000 or less, there is an automatic zero EFC (which sets the family contribution to zero). Because of these provisions, assets have no impact on financial aid for the neediest students.”²⁶

If, after any additional parent-owned asset exclusions, a family still has assets that are not excluded by the EFC formula, then parent-owned assets that are counted towards the EFC are counted at a maximum assessment rate of 5.64 percent. Assets owned by students are counted at an assessment rate of at least 20 percent in the EFC, although universities that have

²⁴Hannon, Simona M., Kevin B. Moore, Irina Stefanescu, and Max Schmeiser (2016). “Saving for College and Section 529 Plans,” FEDS Notes. Washington: Board of Governors of the Federal Reserve System, February 3, <http://dx.doi.org/10.17016/2380-7172.1684>.

²⁵The author spoke with a university financial aid officer from Washington University in St. Louis (a private university), and surveyed ten additional schools by online survey with assistance from financial aid staff from the University of Oklahoma.

²⁶See Clancy, M. & Beverly, S. (2017). *Do Savings and Assets Reduce Need-Based Aid for Dependent Students?* (CSD Policy Brief 17-10). St. Louis, MO: Washington University, Center for Social Development. <https://csd.wustl.edu/Publications/Documents/PB17-10.pdf>.

private or institutional funds that may be included in the financial aid package, may utilize their own institutional methodology and, for example, assess student assets at a 25 percent assessment rate.²⁷ The higher the total assets assessment rate percentage, the greater the negative financial impact is on the student's aid assessment.

For a brief visual explanation, see the table: "CSA Ownership Comparisons Relating to Financial Aid Assessments," below:

<i>CSA Ownership Comparisons Relating to Financial Aid Assessments</i>		
<i>Type of Account:</i>	<i>529 Savings Plans</i>	<i>CSAs Held in Savings Accounts at Banks or Credit Unions</i>
Parent-owned account	If CSA funds are held in a 529 savings account, with the name of the parent on the account as the account owner, the funds in the account are considered parent assets. If the family has assets that are not excluded by the EFC formula, funds in a parent-owned 529 savings account may be counted at an assessment rate of up to 5.64 percent. ²⁸	CSA funds held in a non-agency owned bank account (such as when parents open a bank account for the child), with the student's Social Security number (SSN) connected to that account, are generally considered student assets. If the family has assets that are not excluded by the EFC formula, CSA funds in bank accounts with the child's SSN connected to the accounts may be assessed at a rate of 20 percent or higher, depending on whether or not the school uses an institutional methodology when determining financial assessments.
Agency-owned account	If the school counts CSA funds from agency-owned accounts as scholarships, and if the family has assets that are not excluded by the EFC formula, then the school may count the CSA assets as student-owned assets which could be assessed at a rate of 20 percent (public universities) or higher (a private university using an institutional methodology to assess student assets may use as high as 25 percent). Some in the CSA field maintain that CSA assets held in agency-owned 529 accounts are not owned by the parents and students, but according to the 2017-2018 Federal Student Aid Handbook, agency-owned 529 assets may be counted as student assets. ²⁹	If the school counts CSA funds from agency-owned accounts as scholarships, and if the family has assets that are not excluded by the EFC formula, then the school may count the assets as student-owned assets which could be assessed at a rate of 20 percent (public universities) or higher (a private university, using an institutional methodology to assess student assets, may assess at a higher rate, such as 25 percent).

ADDITIONAL RESEARCH DATA ON THE POTENTIAL IMPACTS OF OWNING CSAS ON STUDENTS' FINANCIAL AID ASSESSMENTS

To learn more about how CSA program design options could impact financial aid assessments, the author designed a seven-question survey in 2017, with guidance from an Assistant Director of the Office of Student Financial Aid at The University of Oklahoma Health Sciences Center. The survey was sent to a distribution list of individuals in two groups, 1) the Oklahoma Association of Student Financial Aid Administrators, and 2) the Southwest Association of Student Financial Aid Administrators in Oklahoma, Texas, Arkansas, Louisiana, and New Mexico. The questions were administered via emails and Facebook postings. Financial aid staff members from ten post-secondary schools responded to the survey. Of the total respondents, eight worked at public universities, one at a private university, and one at a career technical school. Of the ten respondents, none claimed to use an institutional methodology to assess parent or student assets for the EFC.

In the survey, the author posed the following question: "If CSAs are held in a savings account at a bank or credit union, having been opened by a parent as a minor's account for their child, are the assets in the

²⁷Ibid. Also: Personal communication with a financial aid officer at Washington University in St. Louis, on 16 March 2017. The author called this university's financial aid office, as she is an alumnae, to ask how they counted assets in CSAs held in non-agency-owned bank accounts. During the conversations, the author learned that private schools, using an institutional methodology, may assess student-owned accounts at a higher rate of 25%, rather than the 20% found on The EFC Formula, 2017-2018 (<https://studentaid.ed.gov/sa/sites/default/files/2017-18-efc-formula.pdf>). See Powell, Farran. "How Expected Family Contribution for College is Calculated." *U.S. News and World Report*, 2 Aug. 2017.

²⁸See Clancy, M. & Beverly, S. (2017). *Do Savings and Assets Reduce Need-Based Aid for Dependent Students?* (CSD Policy Brief 17-10). St. Louis, MO: Washington University, Center for Social Development. See also [Savingforcollege.com. Does a 529 plan affect financial aid?](http://www.savingforcollege.com/intro_to_529s/does-a-529-plan-affect-financial-aid.php) at http://www.savingforcollege.com/intro_to_529s/does-a-529-plan-affect-financial-aid.php

²⁹See Clancy, M. & Beverly, S. (2017). *Do Savings and Assets Reduce Need-Based Aid for Dependent Students?* (CSD Policy Brief 17-10). St. Louis, MO: Washington University, Center for Social Development. In this Policy Brief, the authors note that "CDA savings accumulated in agency-owned accounts (regardless of savings vehicle) typically *do not affect* need-based aid because students and parents do not own the savings." See Federal Student Aid. 2017-2018 Federal Student Aid Handbook. Application and Verification Guide. Chapter 2-Filling Out the FAFSA, AVG-18 available at <https://ifap.ed.gov/fsahandbook/attachments/1718AVG.pdf>. "Qualified tuition programs (QTPs, also known as section 529 plans because they are covered in section 529 of the IRS tax code) and Coverdell education savings accounts are grouped together in the law as qualified education benefits and have the same treatment: they are an asset of the owner (not the beneficiary because the owner can change the beneficiary at any time) except when the owner is a dependent student, in which case they are an asset of the parent. When the owner is some other person (including a non-custodial parent), distributions from these plans to the student count as untaxed income, as "money received." The University of Oklahoma Financial Aid Services shared this information with the author from the Application and Verification Guide.

account considered student assets (assessed at a 20 to 25 percent rate for the EFC), or are they considered parent assets (assessed at a lower rate of up to only 5.64 percent)?” In response, eight out of the ten respondents stated that their financial aid office would consider the money in savings accounts held at a bank or credit union to belong to the student (as student assets) and not to the parent or guardian.

The author previously posed that same question, pre-survey, in a separate communication with both a financial aid counselor at a private university and a bank branch manager (neither of which were part of the group of ten respondents); to get a baseline read on the issue from both the academic and commercial fields. According to the financial aid counselor at the private university, their financial aid department would consider the assets to be student assets. Their reasoning was that if the bank account was closed today, for tax purposes, the funds in the account would be reported to the IRS as being the child’s assets (linked to the child’s Social Security Number, or SSN).³⁰ The bank branch manager stated that the bank would also consider the assets to be the child’s assets for the same reason: the child’s SSN is on the account. When assets are considered the child’s assets, they may be assessed at a rate of 20 percent or higher, such as 25 percent, if an institutional methodology for assessment of student assets is used (as is done by some private universities).³¹

Based on initial conversations with the bank branch manager and responses from a total of eleven financial aid staff members, it appears that students who will have their parent and child assets assessed for the EFC, and have large balances in savings accounts held at financial institutions, would have their financial aid negatively impacted. Youth from families that would qualify for a simplified EFC formula or have an automatic zero EFC, who opened a CSA at a bank, with the child’s SSN, should not have a reduction in financial aid (or no negative impact). While some research has been conducted in the CSA field about such financial aid implications, the author suggests that more is needed.

Another consideration is that, in the CSA field, some programs use a two-account system: one account being an agency-owned account for the opening deposit and matching funds provided by the program, and a second account being in the name of the

parents, for additional CSA deposits made by the family. The agency-owned accounts have the name of the nonprofit or government agency on the account as the account owner, for the benefit of the child. These accounts may be set-up as custodial bank accounts at a financial institution or as agency-owned 529 savings accounts.

CSA funds designated as scholarships in financial aid evaluations are an additional factor in determining financial aid evaluations. In a 2017 Policy Brief, the Center for Social Development at Washington University noted that there are instances where the funds held in agency-owned accounts are considered scholarships when financial aid officers determine student financial aid.³² According to Clancy and Beverly, this “...is a practice called financial aid award displacement, which occurs when schools reduce previously committed institutional aid for students who receive a private scholarship.” And, “...if the practice continues, award displacement could affect CDAs [CSAs] because agency-owned CDAs are typically treated as scholarships (see Clancy & Sherraden, 2014).”

In the above-mentioned author survey, the question was asked: “For agency-owned accounts, if the nonprofit were to send the funds to your school, on behalf of the student, would your school consider the money a scholarship?” Survey data included four of ten respondents reporting that despite whether the funds were held in agency-owned 529 savings accounts or agency-owned bank accounts, they would consider the funds to be a scholarship if the nonprofit were to send the funds directly to the student’s school on behalf of the student.

To deal with the scholarship issues, some CSA administrators believe that funds should be withdrawn from agency-owned 529 accounts and the money sent to the students, via a check made out to the students, so it will not be considered a scholarship. Based on the author’s research, such actions will not mitigate the fact that those assets could then be counted as student assets and assessed at a rate of at least 20 percent, depending upon the family’s AGI (adjusted gross income) and some other factors, which would also have a negative impact on any financial aid assessment.

Beginning in the 2017-2018 period, when completing the FAFSA, families are required to use financial

³⁰Personal communication. Financial aid officer at Washington University in St. Louis. 16 March 2017. Personal communication with a branch manager at U.S. Bank. 16 March 2017. See also: https://www.irs.gov/publications/p17/ch07.html#en_US_2016_publink1000171412.

³¹Personal communications. Financial aid officer at Washington University in St. Louis and the Office of Student Financial Aid at The University of Oklahoma Health Sciences Center.

³²See Clancy, M. & Beverly, S. (2017). *Do Savings and Assets Reduce Need-Based Aid for Dependent Students?* (CSD Policy Brief 17-10). St. Louis, MO: Washington University, Center for Social Development.

information from the tax/calendar year from two years previous to the school year the funds would pertain to (thus, the 2017-2018 EFC was based on financial information from 2015).³³ Because of this development, some CSA administrators in the CSA field have determined that if they wait until the student is a junior or senior in college to send the agency-owned funds to the school, the funds would not impact the student's financial aid (given that the student will graduate before the CSA funds would be included in a FAFSA, and be counted as student assets). There is no overall current information available as to how successful this strategy has been.

In an attempt to confirm or dispute this issue, the author asked an additional survey question: "If your school considers the money in an agency-owned CSA to be a scholarship, would your school reduce financial aid for the student immediately (that semester), or reduce the financial aid either the following year or the year after that?" In response, one survey participant said they would "immediately" reduce student financial aid for funds coming from an agency-owned account. Another responded that "if the check is sent from an organization other than the 529 administrator, we would probably count it as a resource to be on the safe side [thereby reducing aid]. [However,] If the student provides [pertinent] documentation, we could update [our assessment]." An additional school reported they would "only reduce financial aid based on federal student aid regulations, if necessary." A fourth respondent answered "no," but that such a situation "could [serve as] a detriment to the student and their family, who may have hoped to use some of the funds each year for all four years" of study.

From this initial survey of financial aid staff, given that (as stated above) there is at least one school that would immediately reduce financial aid from funds coming from an agency-owned account, and other schools that gave varied answers as to how they would treat the funds, the advice received does not uniformly or conclusively address the issue of whether or not student financial aid could be reduced if the funds are held in an agency-owned 529 savings account rather than a parent-owned 529 savings account.³⁴ At this time, given the research completed for this paper, it appears that parent-owned 529 savings accounts have the least negative impact on student financial aid packages for students who have assets that will be

included in the EFC formula.

Some might surmise that, if the CSA field wants students to receive the maximum benefit of the accounts, they should work first and foremost with families with low incomes to open the accounts, as they would have an automatic zero EFC and not have to worry about the impact of negative financial aid assessments if funds are held in agency-owned accounts or bank accounts with the student's SSN connected to the account. However, the author thinks that such a strategy would be shortsighted. It may be the case that lower-income families still have an automatic zero EFC by the time their child graduates from high school but, hopefully, families would be building their assets over the eighteen or so years that their child may have an account. That would mean that the parents would have a higher AGI by the time their child leaves for college. Given the unknowns about future family income adjustments, CSA program administrators may wish to design programs in a way that will have the least impact on families with AGIs that increase over time. For tribes interested in offering CSAs for their tribal youths, regardless of family income levels, they will need to find, or create and offer, a universal account design option that will have the least financial aid implications for all interested tribal families.

From the survey data, it also appears that school financial aid officers might treat CSA funds in different ways, per their individual schools. A number of stakeholders in the CSA field suggest that CSA program administrators meet with financial aid officers from schools in their area to introduce CSAs and let them know that a CSA is an asset building tool meant to help, not penalize, a family from a financial aid perspective; especially a family who most needs financial aid. However, given that some tribes have thousands of eligible young tribal members living in states around the nation — who will likely attend schools all over the country — that particular strategy would not always be an administratively feasible option. Tribes and Native-led nonprofits, in such situations, will have to do some research to find and choose a uniform option that will have the least negative impacts on student financial aid for their tribal members.

With the recent changes to the federal tax treatment of repayment of student loans and apprenticeship expenses, related to the passage of the SECURE Act in December 2019, the author is flagging the need for

³³See page one of The EFC Formula, 2017-2018, <https://studentaid.ed.gov/sa/sites/default/files/2017-18-efc-formula.pdf>.

³⁴Personal communication. Financial aid officer at Washington University in St. Louis. 16 March 2017. Survey data, author-generated SurveyMonkey seven-question survey, administered to financial aid advisors who responded anonymously on May 9-10, 2017. Also, see footnote 16 in Clancy, M. & Beverly, S. (2017). *Do Savings and Assets Reduce Need-Based Aid for Dependent Students?* (CSD Policy Brief 17-10). St. Louis, MO: Washington University, Center for Social Development.

further study about attendant financial aid implications. Future research could focus on the timing of when parent-owned and agency-owned CSA accounts are opened for youth, as well as using the 529 funds for repayment of up to \$10,000 in student loans for the account beneficiary and each of their siblings (a new allowable use of 529 funds at the federal level, as of December 2019, that is currently being reviewed by a number of 529 plan boards). More specifically, research could be conducted to explore best practices for an agency-owned CSA that would only be used for loan repayment and not for tuition, so that those agency-owned CSA funds would not be counted as a scholarship for those students who have assets that will be included in the EFC formula for financial aid determination. A parent-owned CSA could be the one to be used to pay for tuition expenses while the student is in school since parent-owned 529 funds are generally assessed at a lower rate for financial aid for students who have assets that will be included in the EFC formula. It will take time until state legislatures and 529 plans determine the state tax treatment of 529 distributions for the newly added apprenticeships and student loan repayment uses, and how these changes could impact financial aid.

Determining financial aid is complicated, and formulas and federal and state tax treatments of 529 distributions will continue to change over time. Perhaps, in the future, federal legislation will offer CSA programs account protections, such as no reduction in financial aid for CSA accounts. However, currently no such guaranteed federal protections exist — regardless of how CSA programs are designed.

THE NEXUS BETWEEN NATIVE CSAS AND POLICY-IMPOSED ASSET LIMITS ON PUBLIC BENEFITS PROGRAMS

CSA assets may have negative impacts on accessing national and state-specific programs that impose asset limits as a qualification for receiving public benefits. Depending on where they are geographically located, some Native CSA programs may choose to open the majority of their accounts through a 529 savings plan because federal and state legislation can provide some protections for 529 account owners that

eliminate negative impacts of their CSA assets on the family's eligibility for public benefits. The Oklahoma Native Assets Coalition, Inc. conducted asset limit research in the state of Oklahoma, with assistance from Margaret Clancy, Policy Director and College Savings Initiative Director at the Center for Social Development at Washington University in Saint Louis, and Tim Allen, Deputy Treasurer for Communications & Program Administration, Office of Oklahoma State Treasurer (then Ken Miller). At the time the research was completed, in 2016, ONAC documented that if a family *in Oklahoma* receives aid based on policies that use both income and owned assets to determine eligibility in public benefit programs such as Medicaid, Children's Health Insurance Program (CHIP), Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Tribal TANF, and the Low Income Home Energy Assistance Program (LIHEAP), a 529 savings account will not impact eligibility for a child or family, due to protections established under specific legislation passed by both the Oklahoma State Legislature and the federal government.³⁵ Asset limits connected to certain policies vary by state for public benefit qualification.

Recent asset limit research from the Center for Social Development at Washington University in St. Louis shows no Medicaid or Children's Health Insurance Policy (CHIP) eligibility impacts related to individually-owned CSAs, due to protections by federal statute, regardless of whether the CSAs are held in savings accounts at financial institutions or in 529 savings plans.³⁶ However, when determining Supplemental Nutritional Assistance Program (SNAP) eligibility, parent-owned (or could be referred to as individually-owned) CSAs are only excluded as assets when CSA funds are held in 529 savings plans. If the accounts are individually owned, and held at a bank or credit union, then in 16 states CSA savings may impact SNAP benefits.³⁷ Those 16 states include: Alaska, Idaho, Utah, Wyoming, South Dakota, Nebraska, Kansas, Missouri, Arkansas, Louisiana, Texas, Tennessee, Virginia, Michigan, Indiana, and Maine.³⁸ As of 2017, if the state where the CSA is established is not on this list, then CSA funds held at bank or credit unions are excluded when computing family resources to determine SNAP eligibility.³⁹

³⁵Finsel, Christy. *Asset Limits and Children's Savings Accounts in Oklahoma*. Oklahoma Native Assets Coalition, Inc. 2016. Tribal TANF programs can exclude Children's Savings Accounts in their resource limits. Allen, Tim. Personal communication. 10 July 2016.

³⁶Beverly, S.G., & Clancy, M.M. (2017, April). (CSD Policy Brief No. 17-24). St. Louis, MO: Washington University, Center for Social Development. <https://csd.wustl.edu/17-24/>.

³⁷Ibid, p. 2.

³⁸Ibid.

³⁹Synopsis of data from the CFED (2016) *Assets and Opportunity Scorecard*. Clancy, Margaret, E-mail. 23 June 2016.

In 2016, the Oklahoma Native Assets Coalition, Inc. also requested and received national guidance from the Tribal TANF central office about CSAs and asset limits. Regardless of how CSA programs are designed (with funds deposited in a 529 plan or a savings account at a financial institution), it is the administrator of a Tribal TANF program that determines eligibility for the program. Therefore, it is up to each Tribal TANF program to set the income and resource (asset) limits. The tribal TANF program must list its financial eligibility criteria in its Tribal TANF plan when submitting it to the Secretary of the Department of Health and Human Services through the Administration for Children and Families. As stated above, Tribal TANF can choose to exclude Children's Savings Accounts in their resource limits.⁴⁰ From ONAC's understanding of this guidance, this allows for Tribal TANF programs to clear barriers for their customers to participate in CSA programs and allows Tribal TANF programs to make determinations about eligibility for their programs, regardless if CSAs are held in custodial accounts, in 529 savings plans, or in regular savings accounts at a bank or credit union. The above guidance applies to any tribally-administered Tribal TANF program.

States determine asset limits for their residents applying for Temporary Assistance for Needy Families (TANF) and Low Income Home Energy Assistance Program (LIHEAP).⁴¹ See the footnote below for a link to lists of states with asset limits for TANF and LIHEAP. Given that this information may change, the author suggests that asset limits be verified with state contacts for TANF and LIHEAP programs.

INFORMED RECOMMENDATIONS FOR ADVANCING THE DEVELOPMENT AND IMPLEMENTATION OF EFFECTIVE NATIVE CSA INITIATIVES

Native-led CSA programs have continued to evolve over time and valuable lessons have been learned through the development and implementation processes. The following recommendations for CSA policy and program development are largely based on both research done in the CSA field in general, and on research and lessons learned from the nineteen Native CSA initiatives described in this paper. It is hoped that

these recommendations will be helpful in assisting tribal and other nonprofits to create new opportunities for, and eliminate barriers to, the future funding, implementation, and sustainability of effective Native CSA initiatives:

Allow Asset Goals (Purchases) for Native Youth That Are Responsive to Their Educational, Cultural and Tribal Community Goals — While more than half of the existing Native Children's savings initiatives are designed primarily to allow for savings goals determined by the youths served, the remainder of the programs are designed to help students and their families to save specifically for education.

Independent of CSA programs, a number of tribes and Native-led nonprofits offer post-secondary education scholarships to Native youth. While such scholarships are needed, they often are provided for tuition costs and not for such expenses as transportation costs, housing costs, clothing costs, non-required books, or childcare. Without funding for school-related costs (other than tuition), it can become difficult, or even impossible, for Native students to complete their chosen college or vocational training courses in a timely manner...or at all.⁴² In these situations, it would benefit tribes and Native-led nonprofits to design children's savings programs that allow for covering a larger variety of related educational costs.

Available funding sources for certain children's savings programs and the account mechanisms in which program administrators choose to hold the youths' savings may also require stipulated permissible uses (as mentioned earlier, by law, 529 savings plans place restrictions on education-related purchases that some other savings vehicles would not). If tribes and Native-led nonprofits want to expand account uses to increase the effectiveness and cultural relativity of their CSA programs, they may be required to develop additional savings mechanisms to allow for these otherwise "non-allowable" asset purchases or goals.

⁴⁰For further information or clarification, Tribal TANF Administrators could contact their regional Administration for Children and Families Tribal TANF contacts. A Tribal TANF plan may need to be amended to include mention of these Children's Savings Accounts if a tribe decides to include them in its Tribal TANF program. Tribal TANF customers should check that their tribally-administered Tribal TANF program has excluded funds in CSAs in their tribal TANF plan and in their Tribal TANF policies and procedures.

⁴¹For lists, from 2017, of states with asset limits for LIHEAP and TANF, see <https://csd.wustl.edu/17-24/>: Beverly, S.G., & Clancy, M.M. (2017, April). (CSD Policy Brief No. 17-24). St. Louis, MO: Washington University, Center for Social Development.

⁴²Author communication with a CSA practitioner in Oklahoma, 2014.

If tribes and Native-led nonprofits do choose to expand asset goals and purchases, and find or provide the funding to do so, some desirable CSA uses or purchases might include: car purchase and repair, and/or airfare (for travel to chosen colleges and trade schools); school clothing; supplies, and; purchasing traditional clothes for participating in tribal dances and ceremonies while the youths are in school (keeping students connected to their culture and communities). Program administrators could design their programs to allow for both shorter-term and longer-term savings options – which might help to better establish an ongoing culture of saving among Native youth and their families.

Tribes and Native-led nonprofits might obtain the additional funding needed for expanded asset building goals and purchases by such means as: lobbying local, state, and federal governments to support expanded uses; finding philanthropic donors that have interests in the areas of higher education, financial capability, building stronger communities, and strengthening cultural identity; and dedicating one or more sources of tribal funds towards this purpose.

Promote and Obtain Available State and/or Federal CSA Support for Tribal and Native-Led Nonprofit Administration of Native CSAs

– It is recommended that tribes and Native-led nonprofits request that any currently available funds, or even future allocations of state or federal funds, for CSA program purposes, be granted directly to Native nonprofits and/or to tribes that apply – including funds for tribal and Native-led nonprofit CSA program administration.

Cory Booker, a former candidate in the United States 2020 presidential election, showed support for a savings mechanism called “baby bonds,” a CSAs savings vehicle that starts at birth.⁴³ If policies are established for truly universal CSAs, such as baby bonds or some other variation of a child’s savings account tool, designing customized accounts and outreach will be essential for meeting local needs, including those in tribal communities.

If, in the course of policy development for universal CSAs, accounts are designed to be held by financial institutions, then issues of lack of geographic proximity to financial institution branches (for making deposits) will need to be addressed for Native and remote populations (tribal members must often drive long distances to bank branches in Indian Country). Or, if such accounts are to be held by the U.S. Treasury Department (given the history of financial mismanagement of Individuals Indian Money, or IIM, Accounts by the federal government), distrust among tribal citizens may exist and impede participation in CSAs for their children. This is not to say that federal administration of accounts would be unwelcome, but it is to say that it would be beneficial if Native CSA experts, and other tribal leaders, be included in the conversations about how to best make such accounts work for *all* residents of the United States, including tribal citizens.

Also, any current and potential funding sources for CSAs should allow sovereign nations to apply directly for grants, without requiring them to partner with nonprofits. A key reason for this is that available funding is often underutilized when tribes are forced to enter into complex Memorandums of Understanding (MOUs), or letters of agreement, with nonprofit entities that are often organized primarily for purposes other than specific benefits to tribes.⁴⁴ See the footnote below that expounds on the significant underutilization of former federal Assets for Independence Act funding for IDAs in Native communities due to this reason (an important former federal funding source for IDA programs).

Currently, the only known federal funds being utilized specifically for tribal CSA initiatives are through Administration for Native American (ANA) grants. To the author’s knowledge, ONAC is the only Native-led nonprofit that is a current recipient of an ANA grant for the purpose of implementing Native CSA initiatives.⁴⁵

According to the Center for Social Development at Washington University in St. Louis, eight states currently have policies in place to provide automatic Children’s Development Accounts

⁴³See <https://www.vox.com/policy-and-politics/2018/10/22/17999558/cory-booker-baby-bonds>. Cory Booker ended his presidential campaign on January 13, 2020. See <https://www.npr.org/2020/01/13/795874596/cory-booker-drops-out-of-presidential-race>.

⁴⁴This was a lesson learned from Assets for Independence (AFI) which required that tribal governments apply for AFI funding with a 501(c)(3). As no funds were appropriated for AFI for fiscal year 2017, the Administration for Children and Families ended AFI grant-making.

⁴⁵ANA funds were utilized earlier to support youth IDA programs through the Native Asset Building Initiative (joint funding by AFI and ANA).

(aka CSAs) to all children born in those states, regardless of income or assets. Those eight states are: Pennsylvania, Maine, Rhode Island, Nevada, Illinois, Nebraska, Colorado, and California.⁴⁶ As tribal citizens reside throughout the U.S., Native youths, from a variety of tribal nations, will benefit from automatic statewide CSAs. States could partner with Native CSA practitioners and tribal leaders to help promote the idea that Native families could make additional deposits into such accounts.⁴⁷

To expand CSAs in Native communities, state or federal partners could be encouraged to 1) consider offering more resources towards data collection and analysis with Native partners; 2) encourage state treasurer's offices to increase Native participation in 529 savings plans by lowering or eliminating minimum opening deposit amount requirements, as well as lowering additional minimum deposit requirements in plans; 3) encourage state treasurers to provide funds to Native nonprofits or tribal partners for marketing 529 accounts to Native families; 4) allow for 'interested party' administration options so that Native CSA program administrators may receive general information about 529 deposits for the tribal youth CSA participants they serve, even if they, as Native program administrators, choose not to be the custodians of the accounts; 5) offer statewide CSAs (which would automatically include benefits to Native children); and 6) provide administrative funding, as well as funds for seed deposits for the accounts, so that tribes and Native-led nonprofits may administer their own programs to meet the local needs of Native youth.

Since every state has the option to be different in the way they design and run their 529 savings plans (within the parameters of the law), and there is also interest in universal accounts at the federal level, it would seem to be sensible for all state and federal partners to become familiar with the current approaches that are working well for Native CSA initiatives, and consider providing additional support for those strategies.

Establish a Continuum of Options to Meet the Funding Needs of Native CSA Initiatives to Allow for Greater Impact and Sustainability

— If funding sources such as state, federal, tribal, foundation, corporate, private, and so on, were to be made more widely available for funding Native children's savings initiatives, it would be greatly utilized if support for the following key Native CSA program elements was allowed: program design; seed money for the accounts; matching funds for at least some deposits, or a percentage of all deposits (if the Native CSA program is interested in adding this feature to their program); allowing for local determination of culturally relevant savings incentives and goals; providing culturally relevant financial education materials and related staff training; supplementing costs for implementing and administering CSA programs; program evaluation, research, and ongoing development; and more opportunities for Native CSA experts to share their work and results with the wider public.

Towards achieving the above support scenario, various private funding institutions could commit to playing more specific roles when investing in Native children's savings projects. For example, some funders may provide funding for program design, some for the implementation process, and some for reporting on, and the evaluation of, pilot and ongoing programs — while others may wish to provide longer-term program support and expansion, to test long-term program viability and prove achievement of desired results.⁴⁸ This would, perhaps, allow for less "burn-out" and attrition in the general philanthropic community related to support of initiatives that may take many years for overall results to be empirically proven. With private corporate financial entities playing a significant role in the success of 529 savings plans to date, perhaps corporate philanthropies could support studies that show the most cost-effective ways to make the plans more universally accessible and effective among people of all income levels, locations, and cultural identities.

⁴⁶Huang, J., Beverly, S. G., Kim, Y., Clancy, M. M., & Sherraden, M. (2019). *Financially vulnerable families reap multiple benefits from Child Development Accounts* (CSD Research Brief No. 19-40). St. Louis, MO: Washington University, Center for Social Development. See https://openscholarship.wustl.edu/cgi/viewcontent.cgi?article=1896&context=csd_research and <https://www.denverpost.com/2019/05/13/colorado-college-savings-babies/>.

⁴⁷In terms of a policy model, statewide CDAs could also partner with tribal social service providers. See Clancy, M. M., Sherraden, M., Huang, J., Beverly, S.G., & Kim, Y. (2019, November). *Statewide Child Development Accounts and Local Partnerships: A Scalable Model That Can Include All Children* (CSD Policy Brief 19-45).

⁴⁸Kakesako, Brent. Personal communication. November 2014.

Native CSA programs have been grateful for the CSA funding they have received from the philanthropic community, as the funding has been used to positively impact the lives of Native youth. However, in the last several years, several of the philanthropies that have previously funded CSA programs have communicated to the field that they are not interested in providing ongoing sustainable funding for CSAs.⁴⁹ One reason for this could be the uncertainty among some philanthropists about what particular issue or issues related to children's savings initiatives fits in with their institutional goals (as CSA programs provide a variety of benefits to children and families).⁵⁰ Also, funders have expressed hesitation to support an effort that might take eighteen years or more to yield definitive results. Since much of the research related to non-Native-led CSA programs has captured about twelve or so years of empirical study, making the long-term impacts of many programs and plans either not yet known, or not yet fully established in the minds of the general public, many potential funders are left unsure of what the overall benefits of supporting CSA plans and programs might be.

Given that the total philanthropic giving in Indian Country from large U.S. Foundations, from 2002 to 2016, averaged only 0.4 percent of total foundation giving, and that only a few foundations are providing funding for Native CSA programs, there is a great imperative for making the case that additional funding support for Native CSA programs, including evaluation, is desperately needed across the nation.⁵¹ Given the numbers of diverse Native communities in the United States (there are 574 federally-recognized Indian Nations plus state-recognized tribes, in addition to Native Hawaiians in the country), with nineteen Native children's savings initiatives that have offered accounts, or are offering accounts to Native youth, a great many Native communities have not yet had the opportunity to benefit from Native CSA programs.⁵² There is need for more

philanthropic investment so that more Native youth can access these accounts.

While this paper documents the current state of the nineteen CSA initiatives known to the author as launched, to date, there are many other sovereign nations that only recently learned about culturally relevant CSA programs, and interest in feasibility is growing. Thus far, most state and regional CSA "pilot" programs have not included Native-led CSA programs in their campaigns or projects. Pilot initiatives are typically intended to explore the feasibility of a concept to be translated into an initiative that is valuable to a target population. These initiatives typically record any achievement of stated desired results (including administration feasibility) and seek to inform new or related policy development. Due to lack of adequate government and philanthropic investment, most Native Children's Savings Account pilot initiatives have had to limit their scope of outreach, as there are not adequate funds to grow the programs beyond a relatively low number of participants.

Most Native CSA programs have also not had opportunities to fully evaluate their results and share them with others; mostly because a number of the longer-running Native CSA programs have not had access to resources needed to accomplish the task. Native CSA programs tend to put most of their focus on opening and funding accounts; rarely acquiring funding support for a robust evaluation. Native CSA initiative practitioners hope that funders, before moving any further away from CSAs, consider funding more Native programs and their evaluations. Funders could also promote connecting CSA program evaluations with, or patterning them after, the evaluations of youth Individual Development Account (IDA) programs, since most youth IDA programs have existed longer than CSAs, and have completed some beneficial research. Additionally, youth IDA program evaluations could provide valuable proxy data for funders related to the benefits of

⁴⁹Personal communications between author and funders.

⁵⁰CSAs help youth and their families by reducing the graduation gap, helping families to jump-start savings efforts for college expenses, changing personal aspirations regarding the benefits of college attendance and completion, and enhancing and increasing savings habits.

⁵¹Native Americans in Philanthropy and Candid. (2019). *Investing in Native Communities: Philanthropic Funding for Native American Communities and Causes*.

⁵²See <http://www.ncai.org/about-tribes>.

funding CSAs and other types of youth savings initiatives.⁵³ Several Native CSA initiatives are interested in tracking longer-term impacts of the accounts on Native youth, but are in need of the necessary funding to do so.

Include Native Projects in Nationwide Children's Savings Pilots — Establishing Increased CSA Networking Connections — Building on the comments above, about lack of inclusion of Native CSA programs in pilot programs, Native partners should be recruited for, and included in, any national CSA pilots. A recommendation is that the pilots be flexible enough to include the desired variations of Native CSA programming. This would allow Native CSA practitioners, working with sovereign nations and Native-led nonprofits, to continue to offer culturally relevant programs that better meet the asset building needs of youths in Native communities. It might also be beneficial to establish a looser definition of CSAs, overall. All Native children's savings initiatives need to be able to self-identify or label themselves as CSAs — if they choose to do so — even if their initiatives differ somewhat from currently established CSA norms.

Defining Native CSAs and related programs continues to be confusing for the field. CSA directories — developed by funders, researchers, nonprofits, or others in the asset building field — might place a Native CSA program in an “other children's savings initiative” category instead of in a “Children's Savings Account program” category. Native CSA initiatives may also be left off of national CSA maps, when illustrating CSA or CDA program locations. These practices may place Native CSA practitioners in a difficult situation, as they must face the possibility that funders, and the larger CSA field, may not consider their programs to be “true” CSA programs. The most potentially damaging result of these practices would be that many effective Native CSA programs would go unnoticed, unacknowledged, and underfunded. Native

practitioners would be forced, as part of fundraising and community program awareness responsibilities, to spend considerable time and effort actively advocating for inclusion of their CSA programs in any existing or potential large-scale CSA demonstrations.

While some Native children's savings initiatives may include CSA account design features that differ from acknowledged norms, Native designers consider their programs to be equivalent in importance to any other CSA or CDA program being implemented in the United States. In spite of the many challenges involved in maintaining culturally relevant and effective CSA initiatives, Native CSA programs are still managing to open accounts for youth (the same as any other CSA initiative), providing the youths in their communities with opportunities to save for their futures. The commendable efforts of Native CSA programs deserve inclusion in the larger body of empirical data related to CSA initiatives being amassed and distributed in the United States.

As part of the recommendation for expanding inclusion of Native CSA programs in the efforts of the larger field, it would also be helpful if the wider asset building field 1) invited more representatives of Native CSA programs to participate in CSA conference panels, 2) offer partnership in targeted evaluation projects, and 3) recognized Native program efforts in communications materials such as “State of the Field” publications, historical timelines, reports to Congress, and other such reporting venues. With such opportunities, Native practitioners could more effectively network, and begin to share their program models and innovations with others interested in designing CSAs in partnership with diverse and/or remote populations. Native practitioners' voices are needed at the planning table, for these reasons and for testing the innovations referred to throughout this paper.

Even if the goal of establishing a future national CSA program, with funding that would serve

⁵³Native youth IDAs have existed since 2000. Data from these programs can inform the CSA field. Also, see Finsel, C. *Individual Development Account (IDA) Program for Eighth Graders at La Salle Middle School in St. Louis City* for thirteen years of youth IDA evaluation data. This paper is under review. While this program data is not Native or CSA specific, it could be viewed as proxy data about the benefits of youth savings initiatives that have had more years of implementation than the more recently launched CSAs. The findings, among African American youth, could be applicable to other communities of color. The data shows that lower-income families do save and complete youth savings programs; savings habits are enhanced by participation in this youth IDA program, and that while further research could be conducted, program graduates report that the programs did impact how they thought about college. This is being born out in their rates of attendance and graduation from college.

all Americans, becomes a reality, there will still be a need for customized CSA programs to meet the cultural and economic development realities, and worldviews, of Native communities and other diverse population groups in the United States. With ongoing development of a pool of Native CSA practitioners with expertise in this area, and more collaboration with the field, funders, researchers, and private, tribal, state, and federal government partners would achieve the goal of opening CSAs for *all* Native youth — helping to reduce the racial “graduation gap,” and gender and geographic wealth gaps, in the process.

Expand Outreach Related to Access to Tax Benefits — 529 savings plans offer some tax benefits, such as “earnings are not subject to federal tax and generally not subject to state tax when used for the qualified education expenses of the designated beneficiary...”⁵⁴ Some states offer additional state tax benefits for contributions to the account.⁵⁵ Also, a person living in any specific state can generally open a 529 savings account associated with other states in the country; meaning that people interested in opening a 529 can shop around and choose from a variety of 529 plans (with varied fee levels and required opening and other account deposits). Some states offer a state tax benefit to the account owner regardless of in which state the 529 plan account is held.

In several policy circles, discussions have focused on the fact that some state treasurer’s offices do not adequately provide 529 savings plan outreach to lower-income families.⁵⁶ In an effort to support perceived greater tax fairness, President Obama unsuccessfully proposed to end 529 college savings accounts in 2015. While acknowledging disparities in the benefits of 529 plan account ownership, there should be no efforts to end 529 plans because low- and-moderate income (LMI) families, and/or those from communities of color, do not take advantage of the opportunities to open 529 accounts as often as others who are

more financially affluent and have greater tax liabilities. Instead, outreach, targeted incentives, and programmatic efforts by Native CSA program administrators, and others who are working to open parent-owned 529 accounts in communities of color, should be supported by the state in those efforts. With adequate funding for outreach and supplemented seed funding for accounts, Native CSA programs could open and provide seed deposits for far greater numbers of 529 accounts for the Native youths in their communities than currently possible.

Even though the tax benefits may often not pertain to LMI families (due to fewer or no tax liabilities owed by those families), having access to a 529 account will allow any account earnings that might, in time, become taxable to grow tax-deferred and at a higher rate than funds held in a traditional savings account.⁵⁷ Additionally, CSA funds held in 529s have the aforementioned asset limit protections for several means tested programs, not currently available to parents holding CSAs at banks and credit unions.

By opening a 529 account for their child or other person, Native families gain more than the opportunity to take advantage of certain tax benefits. Native families are also developing and accomplishing such goals as building greater assets for family security, developing and expanding their investment literacy, and increasing their financial capability by not only opening and managing a 529 account, but also participating in related financial education opportunities.

States can also expand access and remove a key barrier to establishing 529 accounts by LMI families (which often include Native families) by reducing or eliminating minimum deposit requirements attached to the account plans, so that families have the opportunity to deposit smaller amounts into the accounts on a more frequent basis. In addition, more states could offer a pre-determined amount of matching

⁵⁴IRS. (2016). *529 Plans: Questions and Answers*. <https://www.irs.gov/uac/529-plans-questions-and-answers>.

⁵⁵Oklahoma 529 Savings Plan. (2016). *Plan Details & Information*. <https://www.ok4saving.org/plan/details.shtml#details-10>. In Oklahoma, for example, according to the Oklahoma 529 College Savings Plan, “contributions to the Program are generally tax deductible up to \$10,000 per year for a single return and \$20,000 per year for a joint return.”

⁵⁶Weisman, J. “Obama Relents on Proposal to End ‘529’ College Savings Plans.” *New York Times*. 27 Jan. 2015. <https://mobile.nytimes.com/2015/01/28/us/politics/obama-will-drop-proposal-to-end-529-college-savings-plans.html>.

⁵⁷Loya, R., Garber, J., & Santos, J. (2017). *Lever for Success: Key Features and Outcomes of Children’s Savings Account Program* (A Literature Review). Waltham, MA: Brandeis University, Institute on Assets and Social Policy, 21.

or incentivizing deposits for LMI families. Efforts by some states to reduce barriers to 529 college savings participation among LMI families currently exist and have been documented by the Institute on Assets and Social Policy at Brandeis University.⁵⁸

Encourage and Establish Funding Streams for the Program Design Options That Allow Native CSA Programs to be More Flexible and Realistic — In an ideal world, Native CSA programs would be designed and run in such a way that they are able to reach their desired number of Native youths; assisting those youths to become financially capable while building and maintaining savings that will allow them to realize a variety of aspirational and developmental goals. However, this effort would often require million dollar plus budgets for CSA program development, marketing, implementation, administration, evaluation and research, offering opening account deposits, and providing incentive deposits for youth when they meet programmatic benchmarks (such as attending Native-specific financial education classes or tribal history, culture, and good health practices classes; planting vegetable gardens for elders; or graduating from high school).

The current reality is that many Native CSA programs are being implemented through a combination of tight budgets, varying levels of volunteer efforts and, often, in-kind donations. With their current level of financial support, Native CSA practitioners often work to open accounts and provide incentives and program materials on an “as can be afforded” basis. Whenever possible, Native program administrators focus on making sure that the savings accounts they provide are non-predatory, with no or low opening account deposit requirements and no fees charged. Some Native programs are able to provide the opening account deposits, as well as provide financial education materials and other program giveaways, such as t-shirts and piggy banks;

however, most programs are only able to offer a limited number of accounts, without funding to do more.

Native CSA programs could benefit from being able to offer extra savings incentives for the youth, such as deposit rewards when the young people reach certain education milestones or participate in various programmatic financial education and skill-enhancing workshops. The reward components might also incentivize the youth (and their families) to save more than is required to achieve their immediate goals. Other design “extras” that are not necessary, but can be part of a CSA program and might be of interest to Native CSA practitioners, include: administering custodial sub-accounts; management of two accounts per child (so that family savings do not co-mingle with matching funds); working with families to rollover CSA funds into a 529 college savings plan once they have saved a certain amount (if initial funds are saved in more traditional savings accounts); sending periodic custodial account statements to families; offering and tracking matching and benchmark savings deposits (for such things as completing special classes or graduating from high school).⁵⁹

As noted earlier, researchers from the University of Kansas and the Center for Social Development at Washington University in Saint Louis have published research “...which suggests that saving and wealth-building policies to improve college enrollment and graduation rates will have positive effects even when children save very small amounts.”⁶⁰ As there are such low rates of American Indian college completion, some stakeholders in the field see great value in encouraging the proliferation of Native CSA programs that launch with smaller programmatic budgets in mind; those that would focus on assisting parents to open some type of account for the benefit of the youth, and then providing an opening deposit for the youth. Even with the often difficult realities facing Native CSA

⁵⁸Ibid. 20-21.

⁵⁹There is concern that a two-account CSA program may have adverse effects on financial aid. As mentioned earlier in the paper, in the CSA field, some CSA programs administer a two-account system (one account, an agency-owned account in the name of the CSA program, for the opening deposit funds and match funds provided by the program, and a second account, in the name of the parents, for additional CSA deposits made by the family). Native CSA initiatives have not widely adopted this more expensive to administer two-account CSA model. According to the Center for Social Development at Washington University, there are instances where the funds held in the agency-owned accounts are considered a scholarship when financial aid officers determine student financial aid. See Clancy, M. & Beverly, S. (2017). *Do Savings and Assets Reduce Need-Based Aid for Dependent Students?* (CSD Policy Brief 17-10). St. Louis, MO: Washington University, Center for Social Development. More research is needed to determine how individual schools view such funds from agency-owned accounts.

⁶⁰Elliott, W., Song, H-a., & Nam, I. (2013), and Beverly, S. (2010). *Relationships Between College Savings and Enrollment, Graduation, and Student Loan Debt* (CSD Research Brief 13-09). St. Louis, MO: Washington University, Center for Social Development.

practitioners, they encourage their Native peers to move forward with some sort of savings initiative as soon as possible.

From a Native CSA field perspective, the most important goals seem to be: 1) to help Native youth open savings accounts for the first time in their lives; 2) provide them with culturally relevant financial education and; 3) provide an opening deposit for their accounts, whenever possible. While the majority of Native CSA programs are relatively new, some are already reporting that their program models have helped youths and their families to create a “college-bound” attitude; have positive first experiences with mainstream financial institutions and 529 college savings plans; enhance their savings habits and financial literacy and capability; and support efforts to create a nest egg of savings for the future.⁶¹

ADDITIONAL CHILDREN’S SAVINGS INITIATIVES ESTABLISHED IN NATIVE COMMUNITIES THAT ARE COMPARABLE AND COMPATIBLE WITH CSAS

In addition to the nineteen CSA initiative profiles described in *Appendix II*, there are other youth savings initiatives offered by Native communities. These initiatives are part of larger asset building plans developed by tribal governments and Native-led nonprofits on behalf of the tribal citizens they serve. Two important examples of these initiatives are minor’s trust funds and youth Individual Development Account (IDA) Programs. These two initiatives are considered to be part of the wider realm of Native children’s savings initiatives and therefore compatible with CSAs. In order to build a lifelong “asset building pipeline” of age-appropriate asset building programs, Native youth could start at a young age with a CSA, coupled with financial education, then participate in a middle school or high school-aged IDA program with more age-specific financial education, building readiness to receive minor’s trust funds after high school graduation — so that they have become prepared to manage larger sums of money through participation in a continuum of asset building programs.

Minor’s Trust Accounts

As of September 2016, according to an estimated count conducted by Sarah Dewees, former Senior Director of Research, Policy, and Asset Building Programs for First Nations Development Institute, sixty-five Native minor’s trust programs had been established nationally. These accounts are provided by tribes primarily from gaming revenues.⁶² Some children’s savings account proponents see minor’s trust accounts as a variation of children’s savings programs and think they should be acknowledged as such.⁶³ These tribal minor’s trust accounts began being offered in the 1970s.⁶⁴ When acknowledged as children’s savings initiatives, these accounts (set up from minor’s trust funds established by tribes) become the first universal and automatic CSA programs to be offered in the country. The details in the following examples of tribal minor’s trust accounts, including stated innovations, were accurate as of 2011.

Example One of a Minor’s Trust Account Initiative:

Seminole Nation (Oklahoma)

Tribal minors are paid 5 percent of their tribal trust moneys (which are moneys set aside for all members of the tribe, of all ages, by the tribe) at age 18 years of age, if they have a negative drug screen and have earned a high school diploma or GED; otherwise the 5 percent is not paid out until 21 years of age. At the time of the first payout, an additional one-time \$35,000 payout is provided to minors who complete a tribally approved financial education program.⁶⁵

Example Two of Minor’s Trust Accounts:

United Auburn Indian Community (California)

Minor’s trust funds are set up for the younger members of the tribe in such a way that the minors are required to have a high school diploma or GED, or show proof they are still attending school towards getting a diploma, in order to get a per-capita distribution. If that requirement is satisfied, they become eligible for distributions when they reach 18. To receive

⁶¹Information provided by First Nations Development Institute, HACBED, Oklahoma NativeAssets Coalition, Inc., Hawaiian Community Assets, Lakota Funds, and the Sequoyah Fund ‘Kituwah Savings Program.

⁶²Dewees, Sarah. Personal communication. 22 September 2016.

⁶³Jorgensen, M. & Morris, P. (2009). *Tribal Innovations in Children’s Accounts* (CSD Working Papers No. 09-47). St. Louis, MO: Washington University, Center for Social Development.

⁶⁴It is not empirically known when tribal minor’s trust accounts were initiated or started, though separate accounts were set-up as early as the 1970s, when many tribes began distributing revenues from tribal enterprises.

⁶⁵First Nations Development Institute, Edwards and Dewees. (2011). *Developing Innovations in Tribal Per Capita Distribution Payment Programs: Promoting Education Savings, and Investments for the Future*. Longmont, CO: First Nations Development Institute.

distributions, tribal members are required to complete 18 hours of financial education classes provided by the American River College.⁶⁶

Youth Individual Development Account (IDA) Programs

There are at least 23 Native communities that offer, or have previously offered, youth-focused Individual Development Account (IDA) programs in the United States. IDA programs are similar to children's savings programs, but differ in that they are designed for six months to several years (at most) savings durations and are geared towards helping youth purchase certain assets more quickly than if they were saving on their own, since they are given matching funds for their savings, provided through the programs. Generally, IDA programs require regular deposits (often monthly) from the youths from earned income or family deposits, provide a match for the youths' savings at various match rates (rates and required deposit amounts are determined by the individual program and may differ among initiatives), and hold the account deposits in custodial accounts at banks or credit unions. Like CSAs, youth IDAs are also principally vehicles for incentivizing savings for developmental purposes, and financial education is often provided.

To the author's knowledge, the earliest of these Native IDA programs include: ALU LIKE, Inc., (Hawai'i, 2000); Redwood Valley Little River Band of Pomo Indians, (California, 2001), and the Cherokee Nation Commerce Group, (Oklahoma, 2001) – both with assistance from First Nations Development Institute; White Earth Investment Initiative, Sah-Kah-Tay Youth Matching Accounts, (Minnesota, 2004); and the Wai'anae Community Re-Development Corporation's Kuahale IDA Program, (Hawai'i, 2004), which was initially a pilot program with the Hawai'i Alliance for Community-Based Economic Development, HACBED.

A list of known past and current Native youth IDA programs, serving youths under age 18, include:

- White Earth Investment Initiative (WEII) (Minnesota)
- Business Development Services of the Confederated Tribes of the Umatilla Indian Reservation (Oregon)
- Kualoa-He'eia Ecumenical Youth (KEY) Project (Hawai'i)

- ALU LIKE, Inc. (Hawai'i)
- Redwood Valley Little River Band of Pomo Indians (California)
- Wai'anae Community Re-Development Corporation (Initially with HACBED) (Hawai'i)
- Katikitegon-Lac Vieux Community Development Corporation (Michigan)
- Lakota Funds, Inc. (South Dakota)
- Meskwaki Nation Economic Development Program (Iowa)
- People's Partnership for Community Development (Montana)
- Native Youth and Family Center (Oregon)
- Oglala Sioux Tribe Partnership for Housing, Inc. (could serve youth as young as age 16) (South Dakota)
- Four Bands Community Fund (South Dakota)
- Hunkpati Investments (South Dakota)
- Osage Financial Resources, Inc. (recruited high school seniors as part of their program) (Oklahoma)
- Warm Springs Community Action Team (serving youth as young as age 14) (Oregon)
- Umpqua Community Development Corporation (serving youth under age 18) (Oregon)
- Cherokee Nation Commerce Group (Oklahoma)
- Citizen Potawatomi Community Development Corporation (Oklahoma)
- Taala Fund (could serve youth under age 18) (Washington)
- The Institute of Native Pacific Education and Culture (INPEACE) (Hawai'i)
- The Match-E-Be-Nash-She-Wish Band of Pottawatomis Indians (Michigan)⁶⁷
- MIGIZI Communications (Minnesota)

Below are two examples of Native youth IDA programs:

White Earth Investment Initiative (WEII) (Minnesota)

Sah-Kah-Tay Youth Matching Accounts — in 2004, White Earth Investment Initiative (WEII) established a matching account program for twenty Native youths. A conversation between the author of this paper and the WEII program administrator determined that this program

⁶⁶Ibid.

⁶⁷The author called Native Asset Building Initiative (NABI) grantees and included other Native youth IDA programs (past and present) that she was both aware of and had provided technical assistance to, nationally. NABI grantees received funding from both AFI and ANA to fund their programs. See also Larson, A. (2002). *Individual Development Account Handbook and Tribal IDA Program Profiles*. Fredericksburg, Virginia: First Nations Development Institute. <http://community-wealth.org/sites/clone.community-wealth.org/files/downloads/report-larson.pdf>. Maunakea-Forth, J. Kukui. Personal communication. 16 March 2017. Mowrer, Lakota. Personal communication. 16 March 2017. Logsdon, Cynthia. Personal communication. 16 March 2017.

has been self-identified as an Individual Development Account (IDA) program, as there is an earned income requirement, program match, and custodial account feature. WEII has not opened any additional youth matching accounts since 2004. Of the twenty program participants, seven completed the program and received the match funds, ten received the funds they earned but no match funds (as they did not meet the requirements for the match), and three have remaining accounts. WEII is still tracking the accounts for those remaining three participants.

WEII linked their IDA program to other local culturally relevant asset building programming related to the promotion of food security/ food sovereignty and land preservation/ forest preservation. To earn income through this program, the youth planted vegetable gardens for elders and planted trees to promote reforestation. Participants also learned how to preserve food and make salsa. A former reservation-based nonprofit, Sah-Kay-Tay, paid each youth \$40 per day for their labor, with 25 percent of their earnings deposited into a savings account in the youth's name.

Sah-Kay-Tay, and subsequently WEII, works with the bank to put a hold on the savings account so it required one of their signatures for withdrawals (a custodial account feature). Once a youth completes the program, WEII releases their ability to approve withdrawals on the account and the savings account can remain in the youth's name.⁶⁸ During the program, WEII provided a financial education course, utilizing First Nations' *Building Native Communities: Financial Skills for Families* and other curriculum materials. The program administrators stipulated that if the youth graduates from high school and has committed no serious crime, saves \$500, and completes a financial education course, then WEII will match their savings with a 1:1 match of \$500.

Youth participants are allowed to purchase assets of their choice in this program. They are also allowed to keep the remaining money in the account as a nest egg of savings. The seven participants who have completed the program used their funds to make such purchases as vehicles and books for post-

secondary education. For more information, contact Sarah Castro, Development Services Coordinator, Midwest Minnesota Community Development Corporation/White Earth Investment Initiative, scastro@mmcdc.com.

Business Development Services of the Confederated Tribes of the Umatilla Indian Reservation (Oregon)

Youth Matched Savings Pilot Program —

In 2014, Business Development Services of the Confederated Tribes of the Umatilla Indian Reservation's (CTUIR) small business development department administered a grant-funded IDA program, which they referred to as the Youth Matched Savings Pilot Program. CTUIR, located near Pendleton, Oregon, states its mission as "to provide education (workshops, seminars and classes), technical assistance (business plan development, logistics planning, accessing funding, etc.) to Native Americans from any tribe living within our 60-mile service area who are interested in starting or growing a business."⁶⁹ The goal of their IDA program was for CTUIR youth to learn the process of setting goals and meeting deadlines; open a savings account at a credit union; and to make saving money an important part of their life.

During the summer of 2014, twenty-three youth, ages 14 to 18 years old, worked for the tribe and were offered the opportunity to participate in the IDA program. To participate, youth had to complete paperwork (including setting a bi-weekly savings goal), open a savings account at a local credit union, deposit money into their account within three days of payday (providing a copy of the deposit slip), attend a financial education class, and submit a credit union statement at the end of the program — showing that he or she had not withdrawn money from the account during the program period.

If the youth saved for one month and completed all the requirements, they received a 1:1 match. Those youth who saved for three months and completed all the requirements received a 3:1 match. The results of their pilot included that twenty-one of the twenty-three qualified youth signed up for the program. Only two out of the twenty-one participants already had a savings

⁶⁸Castro, Sarah. Program Description. 28 February, 2014.

⁶⁹Retrieved October 27, 2019 from <http://wildhorsebds.com/about/>.

account. Opening a savings account helped reduce the fear of financial institutions, which had affected many of the youths. Nineteen out of twenty-one completed the program and received a 3:1 match. One month after the program ended, eighteen out of nineteen youth had kept their savings account and thirteen youth continued to deposit money into the savings account. Only five had small amounts (\$1 to \$100) in their accounts. For more information about the program contact Raven Manta, Program Coordinator, at raven.manta@wildhorseresort.com.⁷⁰

Compatibility of Various Native Savings Initiatives: The Potential Value of Connecting Children’s Savings Accounts to Minor Trust Accounts and Youth Individual Development Accounts for Developing a Lifelong “Asset Building Pipeline.”

Some tribes, such as the Meskwaki Nation (aka the Sac & Fox Tribe of the Mississippi in Iowa) administer both minor’s trusts accounts and youth Individual Development Accounts. These types of initiative connections could lead to longer-term asset building mindsets and practices for youth, their parents, and their communities.

From 2010 to present, at the Meskwaki Settlement School, youth ages 13 through 18 years old, have participated in financial education classes, as well as biennial First Nations Development Institute (FNDI) \$pending Frenzy events (simulations where youths receive a salary and have to plan to make purchases for a year). In 2012, with technical assistance from Christy Finsel, acting as a Native asset building consultant, the Meskwaki Nation designed and implemented a youth Individual Development Account (IDA) program for enrolled tribal members and descendants, ages 14 through 17 years old, employed by their Summer Youth Employment Program (SYEP).

As of 2018, the IDA program was still active and continuing, serving approximately 40 youth per year. The goals of the IDA program are to improve employee savings habits and financial literacy levels; further introduce youth to banking services and practices; and help youths to use their savings and match funds to make considered purchases that otherwise would take them much longer to obtain.

With this program, the youth employees deposit \$25 of their earned income, on a weekly basis, for the

duration of the eight-week SYEP and, at the end of the program, have their deposits matched 1:3 (youth save \$200 of their own savings and receive \$600 in match funds for a total of \$800 towards approved asset purchases). Youth may use funds to purchase an iPad, laptop, dance clothes for Meskwaki traditional dances, school clothes, school supplies, senior photos, school dance formal attire, and to cover college costs. The IDA accounts are opened as fee-free custodial accounts at Pinnacle Bank, the bank owned by the Meskwaki Nation. The SYEP administrators drive the youth to the bank branch to open the accounts. After opening the account, the youth are responsible for getting to the bank to make their additional IDA deposits.

In 2013, the Meskwaki Nation amended their trust fund policy to eliminate the large lump sum from the minor’s trust fund, previously all paid out to the youth at age eighteen. Instead, the tribe began to provide tiered payments for the youth/young adults over a period of years (from ages eighteen through thirty years). Now, at age eighteen years, and after the youth earn a high school diploma or GED, they receive a 10 percent share of their trust funds. When the youth reach age twenty-one, the young adults receive another 25 percent share of the remaining trust funds. At age twenty-five, they receive a 50 percent share of the remaining payment and at age thirty, they receive the balance.

Several years ago, even though the tribe provides minor’s trust funds, Christy Finsel, hired by the tribe as a consultant, explored how to design a Children’s Savings Account program to help tribal youths develop savings habits at an early age — and reinforce the idea that college attendance is a real and important option in their lives. If implemented, a CSA program could form a lifelong link with the two other asset building initiatives administered by the tribe’s Economic Development Department and their volunteer-run Meskwaki Financial Literacy Committee, as well as their minor’s trust fund.⁷¹

For more information about these connected tribal asset building initiatives, contact: Steve Scott, Community Development Specialist, Meskwaki Nation Economic Development Department, at cds.econdev@meskwaki-nsn.gov, or Jody Fank, Pinnacle Bank Trust Administrator, at jfank@bankpinnacle.us.

It would be wise for the larger asset building field to study lessons learned and success stories related to tribes’ minor’s trust account programs, Native

⁷⁰Description based on earlier draft (5 November, 2014) by Kathleen Flanagan, former Manager, Business Development Services, Wildhorse Resort & Casino, and updates by Raven Manta, Program Coordinator, CTUIR.

⁷¹Lasley, Larry. Personal communication. 20 September 2016. Mr. Lasley was the former Meskwaki Nation Economic Development Director. Fank, Jody. Personal communications. 20 September 2016, and 15 November 2018. For this program description, Mr. Lasley and Ms. Fank shared information about their program with Mrs. Finsel.

youth IDA programs, and Native CSA programs — especially those where the programs are effectively combined into a larger ongoing initiative. A great number of Native communities, along with the wider asset building field in general, could benefit greatly from careful examination of existing programs of these types when planning to design and implement any programs or plans that make the goal of helping youth to save for developmental asset purchases for the longer-term a high priority. Again, these types of innovations (combining several complementary asset building programs to build an “asset building pipeline”) need funding for greater examination (research) and evaluation by the tribal nations and Native-led nonprofits that have had the foresight to implement them.

CONCLUSION AND A REQUEST FROM THE OKLAHOMA NATIVE ASSETS COALITION (ONAC)

As asset builders at the local, regional, state, and national levels explore how governments can better administer savings programs for children, many Native nations and Native-led nonprofits provide excellent examples of, and information pertaining to, how to effectively provide a broad array of options for implementing children’s savings account initiatives for youths of all ages — the human building blocks of our future.

Additionally, as the wider asset building field continues to consider how to meet the challenges that exist in providing asset policy compatible universal CSAs, for all youth, more and more frequently concerns arise, such as: where does the funding come for properly evaluating and researching CSAs on an ongoing basis; how to prevent CSAs from negatively affecting youth financial aid assessments; how to prevent CSAs from negatively impacting social assistance payments; and how to support diverse local needs while also addressing the many cultural distinctions that will affect the degree of participation in CSA initiatives by diverse communities. It may be useful for non-Native asset builders to learn more about the successes and challenges of the program and account innovations originating in a multitude of Native asset building programs across the country.

Previous and current Native youth savings programs and initiatives have the potential to illustrate how the mainstream CSA movement can work effectively with diverse communities to design programs that have cultural fits; focusing on providing meaningful incentives and financial education venues for local participation. Acknowledging the benefits of existing creative practices will likely lead to the future creation of programmatic platforms that greatly increase public participation in CSAs; which will likely prove imperative due to the country’s increasingly diverse cultural environments.

Planning a cultural fit for CSAs in Native communities would likely include such practices as incorporating unique tribal histories, languages, food sovereignty, and art into children’s savings and investment initiatives. Many of the Native children’s savings account practitioners represented in this paper, that have experience with incorporating such practices into their initiatives, have expressed a gracious willingness to share their best practices and lessons learned with the wider CSA community.

The Native-led asset building movement has grown significantly over the past forty-plus years, especially with the implementation of children’s savings initiatives such as minor’s trust accounts, youth IDAs, and CSAs in Native communities. There is much to learn from the program tools that tribes and Native-led nonprofits have and are using to build the aspirations, assets, financial literacy, and financial capability of Native youth and beyond — looking to also create positive impacts on Native families and communities. The Native asset building practitioners featured in this paper have indicated that they look forward to participating in the creative process that leads to inclusive advances in CSAs in the next twenty years.

The author invites any Native asset builders, tribal leaders, and those working with them, who wish to initiate, continue, or expand their engagement in peer learning activities related to asset building initiatives, to contact Christy Finsel at cfinsel@oknativeassets.org. As the Executive Director of the Oklahoma Native Assets Coalition, Inc. (ONAC), Mrs. Finsel will add all who contact her to a master list of Native practitioners so that they may receive invitations to participate in all Native Children’s Savings Account program peer learning events organized by ONAC.



Sarah Dewees



Karen Edwards



Christy Finsel



Brent Kakesako

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Christy Finsel (a tribal citizen of the Osage Nation), the Executive Director of the Oklahoma Native Assets Coalition, Inc. (ONAC), located in Oklahoma City, Oklahoma, has also served as a consultant for promoting specific asset building initiatives with a variety of organizations and other entities that serve Native American populations. Mrs. Finsel originally wrote the first drafts of this paper in a volunteer capacity. However, the completion and publication of the paper in its final form has been achieved through ONAC with support from the Wells Fargo Foundation.⁷² The information in the paper is current, to the author’s knowledge, as of January 2020.

Important documentation supporting many of the declared assertions regarding Native CSAs is provided in the paper —including endnotes and citations. For their assistance in gathering and presenting much of the Native CSA initiative information included in this paper, the author wishes to thank a great number of dedicated people and organizations. She offers special thanks to Brent Kakesako, Executive Director at the Hawai’i Alliance for Community-Based Economic Development, in Honolulu, Hawai’i, for reviewing the paper and providing important comments. She also wishes to thank Dr. Sarah Dewees, former Senior Director of Research, Policy, & Asset Building Programs at First Nations Development Institute, in Fredericksburg, Virginia, for her considered feedback and editing assistance, and Karen Edwards, of KME Consulting, LLC, for her expertise in providing final edits and design suggestions for the paper, and for assisting with the publication process.

Mrs. Finsel also wishes to thank each of the children’s savings administrators and partners who provided information about his or her program for inclusion in this paper, as well as photos of their program

participants. The author acknowledges the following administrators of, and partners with, children’s savings account initiatives serving Native communities that also serve as important sources of information about Native CSAs for the CSA field at large:

- Angie Main, Executive Director, Native American Community Development Corporation, and Matt Harrington, Mini-Bank Coordinator, Native American Community Development Corporation (Montana)
- Anna Knight, Executive Director, Cherokee Nation Commerce Group and Shay Stanfill, Director, Cherokee Nation Small Business Assistance Center (Oklahoma)
- Sarah Castro, Development Services Coordinator, Midwest Minnesota Community Development Corporation/White Earth Investment Initiative (Minnesota)
- Dr. Michael Cheang, Associate Professor, Department of Family and Consumer Sciences, University of Hawai’i at Mānoa (Hawai’i)
- Brent Kakesako, Executive Director, Hawai’i Alliance for Community Based Economic Development (HACBED), and Keoki Noji, Chief Operating Officer of HACBED (Hawai’i)
- Yolanda Garcia-Clifford, Success Coach/Loan Officer, Lakota Fund (South Dakota)
- Hope Huskey, Associate Director, Sequoyah Fund, Inc. (North Carolina)
- Terri Parton, President of Wichita and Affiliated Tribes (Oklahoma)
- Georgia Dick (then Grant Writer) United Keetoowah Band of Cherokee Indians (Oklahoma)
- Susan Adair (then Education Director) United Keetoowah Band of Cherokee Indians (Oklahoma)
- Della Wolfe, Education Intake Specialist, United Keetoowah Band of Cherokee Indians (Oklahoma)

⁷²The information included in the paper might not necessarily reflect the opinions of the Wells Fargo Foundation.

- Lahoma Davidson (then Executive Director) Mvskoke Loan Fund (Oklahoma)
 - Pamela Murphy, then Program Specialist, Mvskoke Loan Fund; and Emory Fox, (then Project Coordinator), Mvskoke Loan Fund (Oklahoma)
 - Michael Lowery, then Grant Coordinator, Eastern Shawnee Tribe of Oklahoma; and Tami Lowery, then Grants Director (Oklahoma)
 - Ed Shaw, Director, Osage Financial Resources, Inc.; Renee Harris, Financial Manager; and Shannon Cass, Intake Specialist (Oklahoma)
 - Kara Pasqua Whitworth, Director, Office of Child Support Services, Cherokee Nation of Oklahoma; and Christina Bowlin, Quality Assurance Specialist and CSA Coordinator, Office of Child Support Services (Oklahoma)
 - Deborah Scott, Executive Director, BeLieving In Native Generations (Oklahoma)
 - Pamela Iron, Executive Director, American Indian Resource Center, Inc.; and Georgia Dick, Four Directions Project Director, American Indian Resource Center, Inc. (Oklahoma)
 - Dr. Pete Coser Sr. (then Director), Scholarship Foundation Program, Muscogee (Creek) Nation (now retired); and Nathan Barnett, Manager, Scholarship Foundation Program (Oklahoma)
 - Tiffany Frieze, Division of Health & Community Services, Pawnee Nation of Oklahoma; and Debra Echo-Hawk, then Title VI Elderly Meals Program Coordinator/FDPIR Department Manager (Oklahoma)
 - Cynthia Logsdon, Assistant Director, Citizen Potawatomi Community Development Corporation (Oklahoma)
 - Linda Rieman, Director, Ponca Tribe Head Start (Oklahoma)
 - Rebecca Stone, Executive Director, Housing Authority of the Seminole Nation of Oklahoma (Oklahoma)
 - Jennifer Oberly, Director, Osage Nation Financial Assistance Department; and Andrea Kemble, Program Coordinator (Oklahoma)
 - Peyton Westmoreland, then Ross Service Coordinator and now Financial Education Coordinator, Housing Authority of the Peoria Tribe of Indians of Oklahoma (Oklahoma)
 - Robert Burkybile, Director, Modoc Housing Authority (Oklahoma)
 - Tommy Robinson, Case Manager, People's Partner for Community Development (Montana)
 - Ian Record, Director, Partnership for Tribal Governance, National Congress of American Indians (Washington, DC)
 - Debbie Dry, Grant Writer, Wyandotte Nation; and Kim Garcia, Accounting Director, Wyandotte Nation (Oklahoma)
 - Molly Tovar, then Director, Kathryn M. Buder Center for American Indian Studies, and Kellie Thompson, Director of the Kathryn M. Buder Center for American Indian Studies (Missouri)
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- Suggested citation: Christy Finsel (2020). Native Children's Savings Initiatives in the United States. Oklahoma City, OK: Oklahoma Native Assets Coalition, Inc. Most of the graphic designs in this paper were based on Mrs. Finsel's Osage dance clothes. For more information, or to contribute additional information on CSA experiences in Native communities (particularly information related to CSA initiatives that may have

been unintentionally omitted), please contact Mrs. Finsel at cfinsel@oknativeassets.org.

ABOUT THE OKLAHOMA NATIVE ASSETS COALITION (ONAC)

The Oklahoma Native Assets Coalition (ONAC) is an American Indian-led nonprofit network of Native people who are dedicated to increasing self-sufficiency and prosperity in their communities. The coalition, headquartered in Oklahoma City, Oklahoma, has existed since 2001, and was classified by the Internal Revenue Service as a 501(c)(3) nonprofit in 2014. ONAC focuses on identifying and promoting effective, culturally responsive asset building strategies for tribal governments and Native-led nonprofits. ONAC serves

Native communities on a national level. Christy Finsel led ONAC through the 501(c)(3) establishment processes and has served as Director of ONAC since September 2011.

ONAC administers four programs, including the largest seed-funded Native-led CSA program in the country. For more information about ONAC, including ONAC programs, please access ONAC's website at: <http://www.oknativeassets.org>.

To access ONAC's most recent interim report on ONAC's CSA program (which includes the total number of Native youth currently being served and other significant data collected on the program) please go to: http://www.oknativeassets.org/our_work/ONAC-programs.

PLEASE SEE THE FOLLOWING APPENDICES:

- I. NATIVE CHILDREN'S SAVINGS INITIATIVES HISTORICAL TIMELINE**

- II. DESCRIPTIONS OF NINETEEN (19) CURRENTLY OR PREVIOUSLY IMPLEMENTED NATIVE CHILDREN'S SAVINGS INITIATIVES**

APPENDIX I: NATIVE CHILDREN'S SAVINGS INITIATIVES HISTORICAL TIMELINE

(C) CHRISTY FINSEL 2020

- 1970s** • The first tribal minor's trust programs were launched in the 1970s.⁷³ Some see the minor's trust accounts as a variation of children's savings programs. When acknowledged as Children's Savings Account programs, minor's trust funds become the first universal and automatic Children's Savings Account programs offered for specific populations in the country.⁷⁴ There are an estimated sixty-five minor's trust funds provided by tribes, primarily from gaming revenues.⁷⁵
- 1996** • Native American Community Development Corporation Blackfeet Mini-Bank Program (Montana)
- 2005** • Cherokee Nation SEED Program (Oklahoma)
- 2007** • White Earth Investment Initiative's Children's Trust Fund (At-Birth Accounts) (Minnesota)
- 2008** • The University of Hawai'i at Mānoa and the Hawai'i Alliance for Community Based Economic Development Kids' Saving Initiative (Hawai'i)
- 2011** • White Earth Investment Initiative's Children's Trust Fund (Naytahwaush Charter School Investment Fund) (Minnesota)
• Lakota Funds Child Development Account Program (South Dakota)
- 2013** • First Nations Development Institute, Bureau of Indian Education School Wingate High School, and Gallup Catholic High School Pilot Program (New Mexico)
• Sequoyah Fund Kituwah Savings Program (North Carolina)
- 2014** • Hawai'i Alliance for Community Based Economic Development and Kōkua Kalihi Valley Youth Savings Initiative (Hawai'i)
• Wichita and Affiliated Tribes (Oklahoma Native Assets Coalition Mini-Grant Awardee) (Oklahoma)
• United Keetoowah Band of Cherokee Indians (Oklahoma Native Assets Coalition Mini-Grant Awardee) (Oklahoma)
- 2015** • First Nations Development Institute and Gallup Central High School Pilot Program (New Mexico)
• Chief Dull Knife College Financial Savvy Program (Montana)
• NAT\$VE in the BANK Initiative, National Congress of American Indians (Various Tribal Citizens Nationwide)
• Hawaiian Community Assets Youth Match Account Program (Hawai'i)
• Kathryn M. Buder Center for American Indian Studies at Washington University in Saint Louis and American Heritage Bank Youth Savings Account Opening Project (Oklahoma)
• Oklahoma Native Assets Coalition, Inc. Children's Savings Account Program
 - Cherokee Nation Child Support Services (ONAC CSA Account Opening Partner, opened first account in 2015 (Oklahoma))

⁷³It is not cited when tribal minor's trust accounts were initiated or started, though separate accounts were set-up as early as the 1970s when tribes started to distribute revenues from tribal enterprises.

⁷⁴Jorgensen, M. & Morris, P. (2009). *Tribal Innovations in Children's Accounts* (CSD Working Papers No. 09-47). St. Louis, MO: Washington University, Center for Social Development.

⁷⁵Deweese, Sarah. Personal communication. 22 September 2016.

APPENDIX I: NATIVE CHILDREN'S SAVINGS INITIATIVES HISTORICAL TIMELINE

(C) CHRISTY FINSEL 2020

- 2016**
- Kaw Nation (Oklahoma Native Assets Coalition Mini-Grant Awardee) (Oklahoma)
 - Ranch Good Days, Inc. (Oklahoma Native Assets Coalition Mini-Grant Awardee) (Oklahoma)
 - Oklahoma Native Assets Coalition, Inc. Children's Savings Account Program
 - Wichita and Affiliated Tribes (ONAC CSA Account Opening Partner) (Oklahoma)
 - Mvskoke Loan Fund (ONAC CSA Account Opening Partner) (Oklahoma)
 - Eastern Shawnee Tribe of Oklahoma (ONAC CSA Account Opening Partner) (Oklahoma)
 - Osage Financial Resources, Inc. (ONAC CSA Account Opening Partner) (Oklahoma)
 - BeLieving In Native Generations (BLING) ONACCSA Account Opening Partner) (Oklahoma)
 - American Indian Resource Center, Inc. (ONAC CSA Account Opening Partner) (Oklahoma)
 - Pawnee Tribe Title VI Elderly Meals Program (ONAC CSA Account Opening Partner) (Oklahoma)
 - Ponca Tribe Head Start (ONAC CSA Account Opening Partner) (Oklahoma)
- 2017**
- Oklahoma Native Assets Coalition, Inc. Children's Savings Account Program
 - Scholarship Foundation Program of the Muscogee (Creek) Nation (ONAC CSA Account Opening Partner) (Oklahoma)
 - Citizen Potawatomi Community Development Corporation (ONAC CSA Account Opening Partner) (Oklahoma)
 - Housing Authority of the Seminole Nation (ONAC CSA Account Opening Partner) (Oklahoma)
 - Osage Nation Financial Assistance Department (ONAC CSA Account Opening Partner) (Oklahoma)
 - Modoc Tribe of Oklahoma Housing Authority (CSA Account Opening Partner) (Oklahoma)
 - Housing Authority of the Peoria Tribe of Indians of Oklahoma (CSA Account Opening Partner) (Oklahoma)
 - Wyandotte Nation (CSA Account Opening Partner) (Oklahoma)
- 2019**
- Oklahoma Native Assets Coalition, Inc. Children's Savings Account Program
 - Absentee Shawnee Housing Authority (CSA Account Opening Partner) (Oklahoma)
 - Kiowa Tribe (CSA Account Opening Partner and Oklahoma Native Assets Coalition Mini-Grant Awardee) (Oklahoma)

APPENDIX II: DESCRIPTIONS OF NINETEEN (19) CURRENTLY OR PREVIOUSLY IMPLEMENTED NATIVE CHILDREN’S SAVINGS INITIATIVES

The following nineteen descriptions of Native children’s savings initiatives are those known to be currently, or previously, implemented in the United States. The initiatives represented below are listed in order of the oldest in inception to the most recently launched. (See map and programs list on pages 6 and 7 for a more concise listing of the programs described below and a map that visually locates the programs).

1. Native American Community Development Corporation Blackfeet Mini-Bank Program (Browning, Montana)



Student depositing funds at Napi Elementary during school banking hours.

Photo by courtesy of the Native American Community Development Corporation Blackfeet Mini-Bank Program.

The Native American Community Development Corporation (NACDC), located on the Blackfeet Reservation in Montana, is a nonprofit affiliate of the Native American Bank that provides services such as training and technical assistance for financial literacy, credit management, business development, Indian Agriculture, and mini-bank programs.

In 1996, the late Elouise Cobell, with assistance from several community members and local teachers, initiated an opt-in mini-bank program at Browning Middle School, in Browning, Montana, on the Blackfeet Reservation. The founders of the program hoped the program would educate the youth about how to manage a savings account, as well as help them become familiar with banking staff and their positions, as the youth help with banking tasks during a “banking

day” in their schools. Youth fill positions in the mini-bank such as tellers and new account representatives.

The mini-bank accounts are set up as custodial savings accounts. NACDC is the custodian on all the youth accounts. NACDC does not provide the opening deposit, or subsequent contributions, for the accounts. The accounts are funded solely by the youth and their families. To open an account, the parent provides the child’s Social Security number, as well as the \$3 minimum opening deposit. The youth bring additional deposit money to their school on scheduled “bank” days. Once the youth deposits are collected at the school or NACDC office, NACDC staff deposit the money into the custodial savings accounts established for each youth and held at the local Native American Bank branch. In order for the child to withdraw funds from the account, the child must show a photo ID, sign a form with the request, and have a NACDC representative also sign the form. The requests are presented to the teller at the Native American Bank branch to complete the withdrawal process. With the mini-bank accounts, the bank charges no penalties for inactivity or low balances. When the youth turn eighteen, the mini-bank account converts to a non-custodial savings account.

NACDC provided technical assistance to entities on the following reservations as they developed their own mini-bank programs: Fort Peck Reservation, Fort Belknap Reservation, and Rocky Boy Reservation in Montana; Fort Hall Reservation in Idaho; and the Ute Mountain Ute Reservation in Colorado. The costs associated with paying dedicated staff to administer the mini-bank initiatives is the responsibility of the entity that helped the youth open mini-bank accounts on each of those reservations. Over 300 mini-bank accounts were previously opened on the abovementioned reservations, though NACDC is not aware as to whether those mini-bank accounts are currently active.

As of November 2018, 228 Native youth have an active mini-bank account at five schools on the Blackfeet Reservation. The Blackfeet youth have saved \$24,296 in their accounts.⁷⁶

⁷⁶Main, Angie. Personal communication. 14 November, 2018. For this program description. Ms. Main shared information about their program with Mrs. Finsel. Matt Harrington, Mini-Bank Coordinator, also provided program updates.

For more information about the NACDC mini-bank program, contact Angie Main, NACDC Executive Director, at angiem@3rivers.net. To learn about NACDC, go to <http://www.nacdcfinancialservices.com/index.html>.

2. Cherokee Nation SEED Program (Tahlequah, Oklahoma)

In 2009, the Cherokee Nation completed a four-year Children's Savings Account pilot, which was part of the national CFED SEED Children's Savings Account demonstration project (Saving for Education, Entrepreneurship and Downpayment). CFED, currently called Prosperity Now, a national asset building organization, provided technical assistance to the Cherokee Nation, based in Tahlequah, Oklahoma, for developing this pilot project. As part of the project, the youth applicants attended an orientation session with their parents or guardians and completed a SEED enrollment application and contract outlining the participant and project responsibilities. Once accepted, the project administrators provided \$1,000 in initial deposit funds, per youth, in a custodial savings account held by Bank of Oklahoma. Two accounts were established per active youth saver: initial deposits and matching funds were deposited into custodial savings accounts and the students opened their own non-custodial accounts to make their savings deposits.

Seventy-five American Indian youth, ages thirteen and fourteen, enrolled in the four-year asset building project in 2005. Of those seventy-five students, one student deposited a total of \$750 of their savings and was matched 1:1 (thus, receiving \$750 in match funds — the highest total achieved). The other students saved less, but still received matching funds on deposits over and above the initial deposit provided by the Cherokee Nation. Students participated in financial literacy classes (twelve hours minimum), held on the campus of Sequoyah High School, and had the opportunity to earn additional savings deposits and matching money by demonstrating desired behaviors such as attending leadership training, participating in entrepreneurship projects, volunteering 25 hours per year in their community, engaging parental participation in financial literacy classes, and maintaining satisfactory grades.

Approximately one-third of the program participants were foster children close to aging out of the foster system. The accumulated savings, leadership skills, and financial skills were even more critical for these youth as they transitioned to independence with little or no family support.

Cherokee Nation's self-reported lessons learned include:

- Parent or guardian involvement is a must;
- Regular contact with both the student and the parental figure are key components to success;
- Providing an initial deposit for the account holder offers instant motivation;
- Incentives for participation or work were helpful — providing the opportunity for students to “earn” matching funds by participating in financial education, earning good grades, participating in leadership skills development, volunteering, etc.; and
- Allowing the use of matching funds to remove typical barriers to post-secondary education is highly beneficial to many youth (transportation costs, dorm fees or rent, and laptops, etc.) in facilitating an ongoing stay in school.⁷⁷

For more information about Cherokee Nation's SEED Project, please contact Anna Knight, Executive Director, Cherokee Nation Commerce Services, anna-knight@cherokee.org or Shay Stanfill, Director, Cherokee Nation Small Business Assistance Center, shay-smith@cherokee.org. To learn more about the Cherokee Nation Commerce Services go to <https://www.cherokee.org/all-services/commerce-services/>.

3. White Earth Investment Initiative's Children's Trust Fund (Ogema, Minnesota)

The White Earth Investment Initiative (WEII) administers two children's savings initiatives, under the umbrella of their Children's Trust Fund, to promote high school graduation among White Earth Nation youth. WEII is a Native Community Development Financial Institution (CDFI), which provides loans and development services. Their service area includes the White Earth Reservation and other Native communities in Minnesota. In addition to children's savings programming, WEII offers loans, leased office space, financial education services (including homebuyer education) and a Volunteer Income Tax Assistance, VITA, program.

In 2004, the WEII established what they refer to as a Children's Trust Fund (a trust fund managed by a board of trustees). Under the trust fund, WEII administers a total of forty children's savings accounts, including thirty-one at-birth accounts and nine accounts for youth at the Nayatahwaush Charter School. In addition,

⁷⁷Stanfill, Shay. Personal communication. 22 September, 2016. For this program description, Mrs. Stanfill shared information about their program with Mrs. Finsel.

they also administered a youth Individual Development Account program — the Sah-Kah-Tay Youth Matching Accounts Program — for twenty Native youth.⁷⁸

The forty children's savings opt-in accounts are custodial accounts, with WEII as the account owner for the benefit of the child. The accounts are held at their affiliate bank, the Community Development Bank, in Ogema, Minnesota. To receive their funds at age 18, each youth must graduate from high school and avoid trouble with the law (they must sign a document stating they have not committed a serious crime). The total forty accounts were self-funded by the Midwest Minnesota Community Development Corporation, WEII's parent company. At age 18, after the youth have met program requirements, WEII releases the funds to them for the asset purchase(s) of their choice.

Descriptions of WEII's two children's savings initiatives (the total forty accounts):

1). At-Birth Accounts— In 2007, WEII began developing their at-birth account program. WEII offered a total of thirty-one accounts for babies born in 2008 (accounts opened in 2009) and 2009 (accounts opened in 2010). Each of those children had to be born in the Village of Naytahwaush, one of five Native villages on the White Earth Reservation. To open the accounts, the parent(s) provided their address, proof of residence in the particular Native community on the reservation, and birth certificate and Social Security number of their child. WEII provided the \$500 opening deposit for each child. The funds were used to purchase Certificates of Deposit (CDs) in WEII's name for the benefit of the child. WEII has not opened additional accounts since 2010. WEII is continuing to administer these thirty-one at-birth accounts and will do so until those youth reach 18 years of age. At that time, if the participants have graduated from high school, and have still not been in serious trouble with the law, they will receive the initial deposit of \$500 from WEII, plus interest earned, to be used for the asset purchase of their choice.

2). Naytahwaush Charter School Investment Fund— In 2011, WEII established a children's savings initiative geared to 6th grade students who attend Naytahwaush Charter School. This program serves nine students. The program was offered to students during the 2011-2012 and 2012-2013 academic years. No new participants were enrolled in the program past 2013, though WEII continues to track the custodial accounts. (WEII is the

custodian on the accounts).

In this initiative, during the first year, WEII provided \$500 per student to purchase a CD in White Earth Investment's name for the benefit of the child. In the second year of the program, as the students completed up to five financial literacy lessons, WEII contributed \$100 for each student, per lesson, in their trust fund. WEII utilized a financial education simulation and curriculums for their financial education classes, including the *Stock Market Game*; *Building Native Communities: Investing for the Future*, a three-prong program of First Nations Development Institute; and *Money Savvy Youth*, a program of the East Bay Asian Local Development Corporation. Once the youth reach age 18, have graduated from high school, and not been in serious trouble with the law, the funds in the account are theirs for their preferred asset purchase.⁷⁹

For more information on these programs, contact Sarah Castro, Development Services Coordinator, Midwest Minnesota Community Development Corporation/White Earth Investment Initiative, scastro@mmcdc.com. To learn more about White Earth Investment Initiative, go to <https://www.weii.website>.

4. The University of Hawai'i at Mānoa and the Hawai'i Alliance for Community Based Economic Development Kids' Saving Initiative (Hawai'i)

From 2008 to 2012, Dr. Michael Cheang, Associate Professor at the University of Hawai'i at Mānoa, in partnership with Bob Agres, then Executive Director of the Hawai'i Alliance for Community Based Economic Development (HACBED), and supported by other HACBED staff, began a savings program for elementary-age children. The savings pilot focused on children from low-income households. More than 2,000 children from twenty-six public elementary schools across the State of Hawaii participated, saving a total of close to \$475,000. It is unknown how many of these youth identified as Native Hawaiian, since that data was not collected.⁸⁰

HawaiiUSA Federal Credit Union, Hawai'i Community Federal Credit Union, Hawai'i First Federal Credit Union, CU Hawai'i Federal Credit Union, HFS Federal Credit Union, Onomea Federal Credit Union, and the Bank of Hawai'i, held the accounts. Participating children received a \$5 initial deposit and were encouraged to save 25 cents a day with an annual goal

⁷⁸A description of Sah-Kah-Tay Youth Matching Accounts Program is available later in this paper in the youth Individual Development Account (IDA) program section.

⁷⁹Castro, Sarah. Personal communication. 28 November, 2016.

⁸⁰Kakesako, Brent. Personal communications, 14 September 2016 and 15 December 2016. Cheang, Michael, Email communications, 20 November 2016 and 29 November 2016. After Dr. Cheang reviewed an initial draft, the author realized more information was needed to make the descriptions comparable with others in this paper. Brent Kakesako provided additional information for the description on 21 April 2017.

\$50 over the school year. Upon achieving their savings goal, the children received a bonus of \$20. Savings incentives and other support were provided by the university and federal research funds, the Bernice and Conrad von Hamm Fund (via the Hawai'i Community Foundation), the Bank of Hawai'i, National Credit Union Association, and the County of Hawai'i.

A variety of partners administered and supported various aspects of the initiative. Dr. Michael Cheang founded and designed the program and analyzed the data. HACBED, assisted with administering funds, collecting data, and building partnerships and networks to support the program and the youth. The school administration and teachers facilitated related all communications with the parents and students and sent reminders about account deposits. The credit unions and banks processed the monthly deposits. Support from mayoral administrations from the County of Hawai'i helped to seed and pilot the initiative, which was spearheaded by Frecia Cevallos from the county Department of Research and Development.

Following the completion of the pilot, parts of the pilot initiative have been adopted by school and credit union partners and integrated into their operations. Efforts by HACBED as well as the Ho'owaiwai Network on Hawai'i Island have begun to explore a new iteration of incentivized youth savings to support 6th through 10th graders, and in the process, support their families through an effort that is tentatively being called the 'Ohana Based Youth Savings Initiative.'⁸¹

For more information about these programs, contact Dr. Michael Cheang, Associate Professor, Department of Family and Consumer Sciences, University of Hawai'i at Mānoa, at cheang@hawaii.edu, or Brent Kakesako, Executive Director of HACBED, at bkakesako@hacbed.org. To view a map of the participating schools per Hawaiian island, go to <https://www.hacbed.org/ysi-kkv/>.

5. Lakota Funds Child Development Account Program (Kyle, South Dakota)

Lakota Funds, located in Kyle, South Dakota, is a Native Community Development Financial Institution (CDFI) that serves tribal members living on the Pine Ridge Reservation, and those residing within a fifty-mile radius of reservation. Lakota Funds offers a variety of youth asset-building programs ranging from financial literacy classes, a youth Individual Development Account program, business plan competition, and a Child Development Account (CDA) program. With funding from the Northwest Area Foundation, and other

non-federal sources, Lakota Funds initiated their CDA program in October 2011. First Nations Development Institute (FNDI) provided a small grant as well, in 2014.

This program was designed to serve twenty-five Lakota Sioux families and to follow them for a total of eight years, from either kindergarten or first grade up to eighth grade. To participate, families must live at, or below, 200 percent of the federal poverty line, attend quarterly Family Financial Literacy Meetings, either in Kyle or Pine Ridge, South Dakota, and deposit up to \$125 a year into the accounts. The majority of the CDAs are held at the Lakota Federal Credit Union, located on the Pine Ridge Reservation.

At the beginning of their program, with funding from the Northwest Area Foundation, Lakota Funds provided \$50 per child for the initial twenty-five youth who enrolled in the program. Subsequent youth participants, who enroll in vacant spots that open as other children leave and no longer participate in the program, do not receive an initial \$50 opening deposit. The family's deposits are matched at a 3:1 match rate on an annual basis, with a \$3,000 cap on match funds per youth for the program. Annually, the program allows for the families to withdraw \$200 from the account to pay for educational or medical expenses at the beginning of the academic year. This allows for shorter and longer-term savings goals. If a child leaves the program before the eighth grade, they receive the funds they deposited but not the match funds. Those youth who deposit \$125 a year, receive the maximum match each year of \$375, and do not withdraw the \$200 annual allowed withdraw for shorter-term expenses, will complete the program with \$1,000 of their own savings and \$3,000 in match funds for a total of \$4,000 in savings.

The current students in the program attend seven schools located on the Pine Ridge Reservation: Our Lady of Lourdes, Red Cloud School, Wolf Creek Elementary, Rockyford Elementary, Little Wound School, Crazy Horse School, and Lakota Waldorf School.

As previously mentioned, Lakota Funds holds Family Financial Literacy Meetings on a quarterly basis, as part of the program. During these classes, Lakota Funds teaches about family financial literacy and invites Native institutions, such as the Lakota Federal Credit Union, to send guest speakers to talk about asset building related topics such as savings products and establishing and building credit. As funding is available, to offset travel costs to attend the meetings (given the distances some travel on the reservation to participate),

⁸¹Kakesako, Brent. Personal communication. 14 September, 2016. Cheang, Michael. Personal communication. 20 November, 2016. Brent Kakesako and Dr. Michael Cheang shared program information with Mrs. Finsel.

Lakota Funds provides a \$50 travel stipend to the families, per meeting.

As of 2016, Lakota Funds had twenty-five active savers in the program (including students who recently enrolled as program slots opened). Most of the youth participants are now in the 5th, 6th, and 7th grades. To date, each participant has saved at least \$1,500 in their CDA, which includes both their annual deposit of \$125 and the Lakota Funds annual match of \$375, after five years in the program.⁸²

For more information about the program, contact Tawney Brunsch, Executive Director of Lakota Funds, at tbrunsch@lakotafunds.org. To learn more about Lakota Funds and their CDA, go to <https://lakotafunds.org/child-development-account-program/>.

6. First Nations Development Institute, Bureau of Indian Education School, Wingate High School, and Gallup Catholic High School Pilot Program (McKinley County, New Mexico)



In 2013, Wingate High School students in McKinley County, New Mexico, opened youth savings accounts through a partnership with Colorado-based Pinnacle Bank and First Nations Development Institute.

Photo by courtesy of Shawn Spruce.

In 2013, First Nations Development Institute (FNDI), a national Native nonprofit, completed a three-year pilot Youth Savings Account (YSA) program in McKinley County, New Mexico. Program planning occurred during years one and two of the grant period, with accounts opening in year three (2013). This YSA was offered to high school youth enrolled in financial literacy courses at the Bureau of Indian Education (BIE) school, Wingate High School, and at Gallup Catholic High School. Teachers at the schools utilized a Native-specific financial education curriculum, “Life On Your Terms,” based on First Nations’ *Building Native Communities: Financial Skills for Families* curriculum.

The purpose of this YSA program, as a complement to their financial education class, was to help high school students open a savings account, increase their savings habit, learn about financial institutions, and build a nest egg of savings.

Through this program, FNDI funded forty-two custodial YSAs at Pinnacle Bank in Gallup, New Mexico. FNDI was the custodian on the accounts and provided \$50 checks to the students to open their accounts. During the program, FNDI provided savings incentives: if the students received a passing grade and took no withdrawals from their account, they were eligible for cash prize drawings. At Wingate High School, FNDI announced one \$100 winner and two \$25 winners, while at Gallup Catholic, one \$50 winner and two \$25 prize winners were drawn.

The W.K. Kellogg Foundation supported FNDI in this effort. Sarah Dewees, then Senior Director of Research, Policy, and Asset Building Programs at FNDI worked with Christy Finsel, a Native consultant hired by FNDI, to design and manage the YSA program. Shawn Spruce, another Native consultant, provided financial education training to the high school teachers who utilized the curriculum. John Phillips, consultant, completed the evaluation report for the project. The program coordinators worked closely with Bruce Lewis, educator at Wingate High School, Charles Yazzie, educator at Gallup Catholic High School, and Roxanna Sullenger and other staff at Pinnacle Bank to open the YSAs.

Data on the program was collected; of the YSA participants, all students reported themselves as American Indian/Alaska Native, and having an average age of 17.2 years; 48 percent of the students identified as female, and 52 percent as male; 55 percent were 10th graders and 45 percent were 12th graders. The banked rate was 69 percent of students before the pilot implementation period. As a result of the YSA program, students reported increased knowledge, positive attitudes, and positive behavior change related to savings and financial management.

FNDI organized the program to offer custodial YSAs so they could track account activity. Because FNDI did not wish to remain custodian on the accounts past the academic year, at the end of the year, they offered options for the students to 1) withdraw funds and close the account; 2) convert to a regular savings account, if they were over age 18; 3) convert to a regular checking account; or 4) convert to a minor’s savings account, if they were younger than age 18.

⁸²Garcia-Clifford, Yolanda. Personal communication. 23 September, 2016. For this program description, Ms. Garcia-Clifford and Tawney Brunsch, Executive Director, Lakota Funds, shared information about their program with Mrs. Finsel.

For more information about the program, contact Catherine Bryan, Director of Programs — Strengthening Tribal and Community Institutions, First Nations Development Institute, at cbryan@firstnations.com. To learn more information about First Nations Development Institute, go to <http://www.firstnations.org>.

7. Sequoyah Fund Kituwah Savings Program (Cherokee, North Carolina)



New Kituwah Academy students making deposits at First Citizen's Bank.

Photo by courtesy of Hope Huskey, Sequoyah Fund Kituwah Savings Program.

The Sequoyah Fund Kituwah Savings Program was designed and implemented in the fall of 2013 at the Kituwah Academy in Cherokee, North Carolina, by Sequoyah Fund staff and Shawn Spruce, asset building consultant, and it continues on today. The Kituwah Academy is a Cherokee language immersion school. The savings program is designed for Kindergarten through 6th graders to promote financial literacy, introduce the idea of saving at a young age, and build positive experiences with banking. The Western North Carolina Community Development Foundation provided the initial funding and First Citizens Bank serves as a banking partner.

Participant accounts were seeded with \$25 and students are encouraged to at least make \$5 bi-monthly deposits. On scheduled days, bank staff is present at the school to take deposits. Sequoyah Fund staff provides financial education through activities and storytelling, stressing the concepts of saving for the future, and goal setting. Successful participation provides an additional \$25 deposit annually for each student. There are no requirements on how the

money is to be utilized, and students and parents are encouraged to continue contributing to the account outside of scheduled deposit days. As of May 2018, the program had opened fifty-nine accounts. Students had contributed \$9,148.66 to those accounts; Sequoyah Fund had provided an additional \$3,175. Beyond the student funds eligible for matching funds from the Sequoyah Fund, Inc., students deposited an additional \$7,804.62 into their accounts.⁸³

As of October 2019, the Sequoyah Fund opened twelve new CSAs and matched ten existing accounts with grant support from Oklahoma Native Assets Coalition, Inc.

For more information about the program, contact Hope Huskey, Sequoyah Fund, Inc. Associate Director, at hopehuskey@sequoyahfund.org. Further information about their program can be found at <https://www.sequoyahfund.org/kituwah-savings-program/>.

8. Hawai'i Alliance for Community-Based Economic Development and Kōkua Kalihi Valley Youth Savings Initiative (O'ahu, Hawai'i)



Bank of Hawai'i Branch Manager, Bill Shiroma, speaks with students from the KVIBE Program about services provided at the branch.

Photo by courtesy of Hawai'i Alliance for Community-Based Economic Development (HACBED).

From 2014 to 2016, Hawai'i Alliance for Community-Based Economic Development (HACBED) and Kōkua Kalihi Valley (KKV) partnered to offer a youth savings initiative on the Hawaiian island of O'ahu, in Kalihi (a neighborhood of Honolulu) for youth participating in the Kalihi Valley Instructional Bike Exchange (KVIBE), a bicycle repair and recycling program.

Through this Initiative, the savers attend financial education and life skills workshops and can earn up to \$125 each in match savings and cash incentives for participating in the workshops. The match funding for

⁸³Huskey, Hope. Personal communications. 22 September, 2016, and 20 November, 2018. For this program description, Ms. Huskey shared information about their program with Mrs. Finsel.

the savings accounts came from an Atherton Family Foundation grant.⁸⁴ During the first two year program, of the thirty-five youth who participated, two self-identified as Native Hawaiian.

In 2016, the program administrators offered the workshops from February to June. The youth chose their own program savings goals and asset purchases, with assistance from members of their community who act as mentors. Program participants opened their savings accounts at a Bank of Hawai'i branch in the Kalihi area, in their name, with no opening deposit requirement and no minimum balance.⁸⁵ The bank accounts were opened during the first two months of the project. The bankers, including Branch Manager Bill Shiroma and his staff, invited the students to meet with them at the bank branch so that they could provide basic banking and finance information to the youth. As of 2018, no additional workshops have been offered. HACBED is in discussion with KKV, KVIBE, and BikeShare about re-implementing a similar program in the future.

For this initiative, KVIBE and HACBED divided the program administrative duties. KVIBE has been responsible for recruiting students for the project, maintaining contact with the youth throughout the project period, and scheduling the workshops. HACBED fundraised for the initiative, served as liaison between KVIBE and the Bank of Hawai'i, designed workshop curriculum, recruited speakers and other volunteers for the workshops, marketed and promoted the initiative, tracked the initiative data, conducted the evaluation, and reported on the initiative.

From collected program data, HACBED discovered that the youth reported their appreciation for opportunities to enhance their public speaking and resume building skills in their workshops. The students recommended that a larger student cohort participate, and more peer learning opportunities be offered. In terms of lessons learned from their program, to date, the administrators believe that more frequent workshops and matching fund payouts would help maintain program momentum and make the incentives more appealing to the youth.

For more information, contact Keoki Noji, Chief Operating Officer of HACBED, at knoji@hacbed.org. To learn more about HACBED, go to <https://www.hacbed.org>.

9. Oklahoma Native Assets Coalition, Inc. (ONAC) Children's Savings Account Program, With Twenty-One Tribal and Native Nonprofit CSA Partners, Plus ONAC-Funded Children's Savings Account Grant Awardees (Various Locations in Oklahoma plus Montana and North Carolina)

The Oklahoma Native Assets Coalition, Inc. (ONAC), (located in Oklahoma City, Oklahoma), is a nonprofit Native-led asset building coalition, which serves tribes throughout the United States. Since 2014, with funding from the W.K. Kellogg Foundation, First Nations Development Institute, the Osage Nation Foundation, the 1:1 Fund, the Administration for Native Americans (ANA), the Chickasaw Nation, and individual and nonprofit donors, the coalition administers a community-based CSA program and is currently working with twenty-one outreach partners to open CSAs (listed as partners below). ONAC CSAs are opened and funded for youth and young adults who are citizens of, or served by, federally recognized American Indian Nations (tribes), and who are of ages from birth to twenty-two years.⁸⁶

Whenever possible, ONAC funds accounts for all youths in a participating family, as this approach makes more cultural sense to the Native communities that already prioritize communal-type asset building approaches highly. The first thirty-five accounts were opened as regular savings accounts at banks or credit unions of the ONAC partner's choice. The second wave and on have CSA accounts that are opened through 529 college savings plans, most with the parent as the account owner to take advantage of asset limit protections associated with 529 plans in general, and financial aid protections associated with parent-owned 529 plan accounts.

The tribe or Native nonprofits working with ONAC may put their names on the accounts, as custodians, for the benefit of the children, although, to date, none have decided to do so as they do not want to be administratively responsible for the accounts for potentially many years. (Since, in some cases, the accounts may be opened for eighteen plus years if the child is an infant when the parent or guardian opens the account). To date, ONAC has also decided not to put its name on the accounts as the custodian. The youth may save for asset purchases, such as post-secondary

⁸⁴Noji, Keoki. Personal communication, 27 February 2017. For this program description, Mr. Noji, Chief Operating Officer of HACBED, shared information about their program with Mrs. Finsel.

⁸⁵Kakesako, Brent. Personal communications. 14 September, 2016, and 11 December 2018. For this program description, Mr. Kakesako, Executive Director of HACBED, shared information about their program with Mrs. Finsel. As a means of looking for ways that incentivized accounts can be integrated with other supports and offered to the adults in the families they serve, in 2015 HACBED supported the County of Hawai'i Office of Housing & Community Development to do an incentivized saving initiative where they implemented a direct deposit program for Housing Choice Voucher and Tenant Based Rental Assistance program participants. This was a Bank On 2.0 Pilot Summary for Hawai'i County.

⁸⁶The 270 ONAC CSAs funded by the W.K. Kellogg Foundation were for children, ages birth to age eight living at 200% of the federal poverty line. The accounts funded by grant funding from First Nations Development Institute had no age or income stipulations. The accounts funded by the Osage Nation Foundation were for Osage youth up to age eighteen. The 1:1 Fund, ANA, Chickasaw Nation, and individual donors have no age or income restrictions.

education or other asset purchases (depending upon tribe and Native nonprofit preferences, and the chosen account mechanism — either a 529 college savings plan or a financial institution).

As of December 2019, ONAC has funded 930 CSAs (883 opened and funded by ONAC and 47 more CSAs funded through recent grants to the Sequoyah Fund, Inc. in North Carolina, People's Partner for Community Development in Montana, and the Kiowa Tribe in Oklahoma). Of the 883 accounts, ONAC worked with twenty-one tribal and Native-led nonprofit partners and opened and funded 826 accounts with its partners, plus funded mini-grants for an initial thirty-five accounts that were opened by the Wichita and Affiliated Tribes and the United Keetoowah Band of Cherokee Indians, as well as awarded two mini-grants to the Kaw Nation and Ranch Good Days, Inc. for twenty-two more accounts, for the total of 883 accounts. Of the 883 accounts, 809 accounts were opened through the Oklahoma College Savings Plan; thirty-five were opened at financial institutions (one bank in Anadarko and another in Tahlequah); twenty accounts were funded by an ONAC grantee, the Kaw Nation (those families could choose to open accounts either through the Oklahoma 529 College Savings Plan or at a financial institution of their choice; and the tribe did not collect information on the family's choice); and nineteen accounts were opened through the "MOST Plan" (the Missouri 529 College Savings Plan).⁸⁷

Of the 883 accounts funded directly by ONAC to date, 881 accounts were opened for American Indian youth and two accounts were opened for non-Native youth (one of the tribal program ONAC works with serves Native and non-Native youth). Of the 529 accounts for which ONAC has collected income data, 86 percent were opened for youth living at or below 200 percent of the federal poverty line, and 70 percent were opened by women and grandmothers raising grandchildren. Less than 1 percent of the account holders reside in Oklahoma City, Tulsa, or Norman (largest metropolitan areas in the state), leaving more than 99 percent of account holders residing in smaller cities throughout Oklahoma. ONAC has also collected age and gender data on the youth.

As a CSA program administrator, ONAC fundraises for the program. ONAC provides the opening account deposit for the youth (\$100 per account for ONAC-

funded CSAs), plus covers the costs of a piggy bank, certificate celebrating the account, an ONAC Native-specific financial education booklet, art supplies for the Native arts component, and gardening seeds to promote home gardening and the concept of food sovereignty for the families (with any resulting plants regarded as an additional asset built through the program), for each young account holder. ONAC provides no match funds; only initial opening deposits.

ONAC works with their partners to plan account opening events, facilitates account opening events, walks the parents through the account opening forms, and processes applications at the end of the events. Parents complete a 529 application, either online or a paper version, and an ONAC CSA application that collects qualitative and quantitative data.⁸⁸ After the events, ONAC writes a check for each account and mails all the checks, with the children's names and either Social Security numbers (if they opened their account via a paper application) or account numbers (if they opened their accounts online) included on each check, to the administrators of the chosen 529 savings plans.

ONAC enters the ONAC CSA application information into an ONAC CSA database and is responsible for the evaluation of the program. Beyond ONAC initially collecting income, child age, gender, and other information, ONAC provides a follow-up survey for parents or guardians, in order to track parent's contributions to the accounts, and offers raffles to incentivize parent completion of the follow-up survey. While the Oklahoma 529 College Savings Plan provides a folder with information about the plan, which ONAC distributes at account opening events, ONAC also now distributes an additional customized ONAC investor education booklet for the parents, to provide more helpful information to them about managing their 529 account. To promote a two-generation approach to asset building, at CSA account opening events, ONAC is also working with the parents/guardians to open seed-funded family emergency savings accounts (with an opening deposit of \$300 per emergency savings accounts provided by ONAC). ONAC's partners provide the adult financial education for the emergency savings account participants, with many of the partners receiving Native-specific financial education training at ONAC-co-hosted financial education train-the-trainers.

⁸⁷ONAC opened 529 accounts in Missouri, as the Eastern Shawnee Tribe of Oklahoma's seat of government, located in Wyandotte, Oklahoma, is based near the border of Oklahoma and Missouri. The Eastern Shawnee Tribe of Oklahoma has tribal members living in both states who attended their financial education classes. By the parent's opening the accounts in their respective state 529 plans, they receive state tax benefits for contributions they make to their children's accounts. ONAC has board approval to open CSAs in any state in the United States. ONAC has designed online account application infrastructure, but has not yet launched that technology.

⁸⁸Thus far, from partner and ONAC feedback, a lesson learned is that it is best for the parents and guardians to complete the application materials at the account opening events and not take the account materials home. Fewer of those who took applications home, from the events, returned the completed forms to ONAC.

In terms of the partners' responsibilities for ONAC funded CSAs, all partners market and/or provide outreach for the events to targeted populations within their tribe or nonprofit. The partners provide the space for the events and one-on-one account opening activities in their local communities. Many offer a snack or meal for the events, and some secure additional volunteers or staff to help with the event. Several of the partners have conducted follow-up actions with parents or grandparents in the programs who were unable to attend the events, to help them complete the account applications — and then send the applications on to ONAC for processing. Information about any additional CSA activities by specific partners is included in the descriptions of the twenty-one ONAC CSA partners below. The ONAC-funded mini-grant awardees are listed separately.

The mini-grantees were responsible for their project implementation, with ONAC providing them with technical assistance as requested. To acknowledge the work of ONAC grantees and CSA partners, descriptions are provided below. Grantee descriptions were based on their ONAC grantee reports.

ONAC has also provided technical assistance to two larger tribes in Oklahoma that are considering self-funding Children's Savings Account programs for their tribal citizens (to serve a total of well over 22,000 Native youths).

Below, are the twenty-one tribal and Native-led nonprofit ONAC CSA partners (including the five grantees that received funding from ONAC to administer CSAs in Oklahoma).

10. Wichita and Affiliated Tribes (Anadarko, Oklahoma) (CSA Program Administrator and ONAC CSA Partner)

From 2014-2015, utilizing a \$3,500 ONAC mini-grant, Wichita and Affiliated Tribes administered a Wichita SummerSmart Youth Program. Goals for the program included building tribal pride through teaching Wichita history and culture and promoting good health practices in the community. They also offered savings accounts for the interns and youth participants, as well as financial education classes.

During the program, with the grant funds and leadership from Wichita and Affiliated Tribes President Terri Parton, the Wichita and Affiliated Tribes opened twenty-seven Children's Savings Accounts, including four accounts for their youth interns. The children learned about aboriginal homelands of the Wichita and Affiliated Tribes, the importance of traditional foods, such as corn, and their Native language. The youth were encouraged to participate in a variety of physical activities such as dodgeball, kickball, and other sports.



President Terri Parton, Wichita and Affiliated Tribes, with youth savers at the bank.

Photo by courtesy of the Wichita and Affiliated Tribes.

Additionally, the tribe's Food Distribution staff provided nutrition classes for the youth and a banker came and discussed the importance of saving money with the youth. The children were drawn into discussions about the things they would like to save for in the future. To reinforce those activities, Wichita and Affiliated Tribes President Terri Parton held a discussion with the youth to emphasize the importance of saving for things that the youth wanted and needed.

After that ONAC-funded grant project ended, President Terri Parton worked with ONAC to become an ONAC CSA partner. On December 8, 2016, the tribe co-hosted an ONAC CSA account opening event at the Wichita and Affiliated Tribes community center in Anadarko, Oklahoma, and thirty accounts were opened that night. The accounts were available to tribal youth on a first-come/first-serve basis. The tribe had sent letters to eligible tribal members to alert them to this opportunity. During the event, ONAC worked with the interested parents and grandparents to open the accounts. Several youth participated in the art project that was offered, and a few children took home art supplies to work further on a piece of art that illustrates their understanding of Native assets. President Parton greeted each family and added the children's names to the certificates celebrating their account. On August 2, 2018, March 1, 2019, and August 2, 2019, ONAC attended account opening events and funded one hundred additional accounts.

Project lead: Wichita and Affiliated Tribes President Terri Parton.



Natalie Christie, from Vian, Oklahoma, received the Award of Excellence for outstanding participation in the “Save and Secure Financial Literacy Program.” Presenting the award to Ms. Christie is United Keetoowah Bank Education Intake Specialist, Della Wolfe.

Photo Credit: Sammy Still.

11. United Keetoowah Band of Cherokee Indians (Tahlequah, Oklahoma) (CSA Program Administrator)

Through a \$3,500 ONAC mini grant for 2014-2015, the United Keetoowah Band of Cherokee Indians offered a youth employment and financial education program that required participants to save their earnings in a youth savings account. During this program, eight participants received information about ONAC, completed online financial education training, and developed an action plan for saving. Students learned about savings, interest, credit scores, and the importance of saving and budgeting. Students were placed at work sites in their community and were paid to complete twenty hours of service. The students then deposited their earnings into a savings account established through the program.

Participants completed their work hours at the United Keetoowah Band of Cherokee Indians Library and the Cherokee Nation Heritage Center. They also worked as helpers during community events and as elder assistants. The yearlong program ended with a ceremony held in honor of the participants at the George Wickliffe Education Center.

Project leads: *Georgia Dick, then Grant Writer, United Keetoowah Band of Cherokee Indians; Susan Adair,*

then Education Director, United Keetoowah Band of Cherokee Indians; and Della Wolfe, Education Intake Specialist, United Keetoowah Band of Cherokee Indians.

12. Kaw Nation (Kaw City, Oklahoma) (CSA Program Administrator)

During June 2016, with support from a \$3,500 mini-grant from ONAC, the Kaw Nation conducted a financial education workshop for twenty Kaw Nation students between the ages of 12-17. During the workshop staff members from Eastman National Bank and City National Bank, as well as Stephen Coit — a Fiduciary Trust Officer with the Office of Special Trustee for American Indians, presented financial education information to the Native youth participants.

Kaw students traveled from Tahlequah, Newkirk, and Ponca City, Oklahoma, as well as Augusta, Kansas, to attend the classes. Upon completion of the classes, with ONAC mini-grant funding for CSAs, the Kaw Nation provided each youth with \$135 to be used to open or fund a savings account at either a bank or credit union or through a 529 college savings plan.

The youth had an opportunity to earn more money for their savings accounts by participating in an essay contest, which was funded by ONAC mini-grant funding. The Kaw Nation Tribal Youth Program chose the essay topic. The students were asked: How can you use the information you have obtained from the Kaw Nation ONAC Financial Workshop to reach your future financial goals? Essay rules and applications were made available to all students at the conclusion of the workshop. Three City National Bank employees read and selected the three winning essays. The essay winners were awarded a total of \$500 in prize money, with a \$300 1st place prize, \$150 2nd place prize, and a \$50 3rd place prize.

Project lead: *Sabrina Norris, then Kaw Nation Research Assistant/Grant Writing Specialist.*

Mvskoke Loan Fund (Okmulgee, Oklahoma) (ONAC CSA Partner)

The Mvskoke Loan Fund, a Native Community Development Financial Institution, located in Okmulgee, Oklahoma, held an ONAC CSA opening event that coincided with a Muscogee (Creek) Movie Night. Together with ONAC, the Mvskoke Loan Fund opened 116 Children’s Savings Accounts with Muscogee (Creek) parents and guardians.

Building from Native teachings that define assets as more inclusive than simply money, the Mvskoke Loan Fund invited a Muscogee (Creek) artist, Daniel Wind III, to display his work. Muscogee college

students volunteered to work with the youth attendees on artwork that the youth created to express their understanding of assets. The youth drew pictures of their families, homes, flowers and trees, food, and a person graduating and getting a job. The Mvskoke Loan Fund staff helped families to complete the Oklahoma 529 College Savings Account applications if they were unable to attend the account opening event.

Partner leads: *Lahoma Simmons, then Executive Director of the Mvskoke Loan Fund; Pamela Murphy, then Program Specialist of the Mvskoke Loan Fund, and Emory Fox, then Project Coordinator of the Mvskoke Loan Fund. To reach a current staff member, contact Christopher Coburn, CEO, Mvskoke Loan Fund.*

Eastern Shawnee Tribe of Oklahoma (Wyandotte, Oklahoma) (ONAC CSA Partner)

In June of 2016, the Eastern Shawnee Tribe of Oklahoma, located near Wyandotte, Oklahoma, opened a total of fifty ONAC Children's Savings Accounts for youth enrolled in a financial education program that they provided, as well as for children who attend their Early Childhood Learning Center.

A Family and College Savings Plan Night was held by program leaders at their Early Childhood Learning Center with the support of Bobbie Ahrens, then Director of the Center, and Ron Wallace, Director of the tribal Wellness Center. During that event, the Eastern Shawnee Tribe of Oklahoma scheduled a storytelling event, a Native arts project, supervised playtime, and offered dinner to participants. Chief Glenna Wallace attended the event to support tribal staff and to encourage the parents and youth to deposit more funds in the account over the years. Michael Lowery, then Grant Coordinator, followed-up with parents and helped them to complete 529 applications, if they were unable to attend the account opening event. In June of 2017 and April of 2019, ONAC worked with their Early Childhood Learning Center and Grants Department to open twenty additional accounts with parents.

Partner lead: *Chief Glenna Wallace of the Eastern Shawnee Tribe of Oklahoma.*

Osage Financial Resources, Inc. (Pawhuska, Oklahoma) (ONAC CSA Partner)

Osage Financial Resources, Inc. (OFR), located in Pawhuska, Oklahoma, is working with the families they serve in a housing complex they manage, located behind their Pawhuska offices. ONAC has attended two account opening events at the OFR office and the OFR staff is now sending completed account applications to ONAC by mail.

OFR has opened forty-nine accounts for Native youth.

As Osage Financial Resources was included as a partner on two separate ONAC grants, the first ten accounts received \$200 in funding from ONAC. The remaining thirty-nine accounts received \$100 in funding from ONAC and \$100 in funding from Osage Financial Resources, Inc.

Partner leads: *Ed Shaw, Director, Osage Financial Resources, Inc.; Renee Harris, Financial Manager, Osage Financial Resources, Inc.; and Shannon Cass, Intake Specialist, Osage Financial Resources, Inc.*

Cherokee Nation Child Support Services (Tahlequah, Oklahoma) (ONAC CSA Partner)

ONAC and the Cherokee Nation Child Support Services, located in Tahlequah, Oklahoma, have arrived at an alternative option for state-owed debt forgiveness that other tribally-administered CSA programs in the state may want to consider offering their clients, in response to the fact that state-owed debt forgiveness is not allowed in Oklahoma.

To add extra incentive for parents served by the Cherokee Nation Child Support Program to deposit funds in children's savings accounts, the support program will extend an offer for private mediation to the custodial and non-custodial parents who have establishment and enforcement cases. In order to work out a good obligation resolution, if both parties are willing and the non-custodial parent owes the custodial parent money, the non-custodial parent may deposit money into a Children's Savings Account for the benefit of their child. This reduces the non-custodial parent's debt, and helps the child to have a bigger nest egg of savings in their accounts.

The Cherokee Nation Child Support Program has opened one account through the private mediation process. They worked with their child support clients to open Children's Savings Accounts for families with an annual income equal to or less than 200 percent of the federal poverty level, who have children ages birth to eight. It is hoped that this Children's Savings Account project, with an added parental debt reduction component, may be a model for other tribally-administered Child Support Programs that wish to offer Children's Savings Account programs. Custodial parents that did not enter the private mediation option, because they decided they needed all child support available to them, opened thirty-one additional accounts between December 2017 and February 2019.

The Cherokee Nation Child Support program continues to generate policies and procedures, both internally and with ONAC, as their project added new levels of programming. After receiving some training assistance from ONAC and TIAA, they open accounts directly with their clients. The program then sends a completed

application form to ONAC for processing.

Partner leads: *Kara Pasqua Whitworth, Director, Office of Child Support Services, Cherokee Nation of Oklahoma, and Christina Bowlin, Quality Assurance Specialist and CSA Coordinator, Office of Child Support Services, Cherokee Nation of Oklahoma.*

BeLIEving In Native Generations (Anadarko, Oklahoma) (ONAC CSA Partner)

BeLIEving in Native Generations (BLING), a Native-led nonprofit, partnered with ONAC to begin to open Children's Savings Accounts for 4th and 5th grade students attending Riverside Indian School, located in Anadarko, Oklahoma. ONAC also funded CSAs for the students' siblings.

At the end of September 2016, during the account opening event, ONAC, BLING, and staff from the school, met with the parents of the students and assisted them as they opened six Oklahoma 529 College Savings Accounts for the benefit of their children.

Partner lead: *Deborah Scott, Executive Director, BeLIEving In Native Generations.*

American Indian Resource Center, Inc. (Tahlequah, Oklahoma) (ONAC CSA Partner)

The American Indian Resource Center, Inc. (AIRC), a Native-led nonprofit based in Tahlequah, Oklahoma, partnered with ONAC to open forty Children's Savings Accounts for 5th-8th grade students in the Cherokee Immersion after-school program, as well as for the students' siblings. During this particular account opening event, the parents attended and opened the accounts with assistance from ONAC and AIRC staff.

ONAC leadership secured a Cherokee artist, Matthew Anderson, Cultural Specialist at the Cherokee Arts Center & Spider Gallery, to attend and share information about traditional Cherokee arts. The students then completed a Native arts project. As a means of promoting the concept of building multiple Native assets, ONAC provided each student with a bag of organic gardening seeds, as well as gardening instructions. Georgia Dick also worked with several families to complete the 529 applications if they were unable to attend the account opening event. In 2018, AIRC was awarded a grant to fund emergency savings accounts for Cherokee youth. By April 2019, AIRC completed their grant project after funding emergency savings accounts for seven youth.

Partner leads: *Pamela Iron, Executive Director, American Indian Resource Center, Inc., and Georgia Dick, Four Directions Project Director, American Indian Resource Center, Inc.*

Scholarship Foundation Program of the Muscogee (Creek) Nation (Okmulgee, Oklahoma) (ONAC CSA Partner)

The Scholarship Foundation Program of the Muscogee (Creek) Nation, located in Okmulgee, Oklahoma, worked with ONAC to fund five new accounts and to add funds to four other accounts (\$100 more per account) opened in 2016 by the Mvskoke Loan Fund and ONAC.

The Scholarship Foundation Program of the Muscogee (Creek) Nation plans to make additional deposits in the accounts by offering up to \$200 in additional funding for the accounts.

Partner leads: *Dr. Pete Coser Sr., then Director, Scholarship Foundation Program, Muscogee (Creek) Nation (now retired), and Nathan Barnett, Manager, Scholarship Foundation Program, Muscogee (Creek) Nation.*

13. Ranch Good Days, Inc. (Concho, Oklahoma) (CSA Program Administrator)

On April 14, 2017, with ONAC mini-grant funding, Ranch Good Days, Inc., a nonprofit, worked with ONAC to open two Children's Savings Accounts for youth connected to a basketball team comprised of youth from the Cheyenne and Arapaho Tribes of Oklahoma, located in Concho, Oklahoma. The accounts were opened through the Oklahoma 529 College Savings Plan.

Partner lead: *Donna Otabachian, Executive Director, Ranch Good Days, Inc., Altus, Oklahoma.*

Pawnee Tribe Title VI Elderly Meals Program (Pawnee, Oklahoma) (ONAC CSA Partner)

Pawnee Tribe Title VI Elderly Meals Program, located in Pawnee, Oklahoma, opened forty-eight accounts for the grandchildren of grandparents who participate in that program. ONAC worked with their program staff and the grandparents to open the accounts through the Oklahoma 529 College Savings Plan. Many of the grandparents and great-grandparents are the account owners as they are raising their grandchildren and great-grandchildren.

During the first account opening event, the grandparents and great-grandparents enjoyed a meal made and served by the Pawnee Business Council and the Elderly Meals Program. The grandparents and great-grandparents heard an introduction by Debra Echo-Hawk, then Title VI Elderly Meals Program Coordinator and their tribal Assistant Keeper of the Seeds (tribal heirloom seeds), who spoke to them about the connection between their tribal heirloom seed saving project and the idea that opening a Children's Savings Account is a way to "plant" an

educational seed for their grandchildren and great-grandchildren. After the introduction, ONAC worked with the grandparents to complete the 529 account applications.

For those grandparents and great-grandparents who were unable to complete the forms at the account opening event, Debra Echo-Hawk, Danielle Wheatley, Pawnee Nation Elder Center Cook, and ONAC continued to work with individual grandparents and great-grandparents to complete their applications.

Partner leads: *Tiffany Fritze, Division of Health & Community Services, Pawnee Nation of Oklahoma, and Debra Echo-Hawk, then Title VI Elderly Meals Program Coordinator/FDPIR Department Manager, Pawnee Nation of Oklahoma.*

Citizen Potawatomi Community Development Corporation (Shawnee, Oklahoma) (ONAC CSA Partner)

Citizen Potawatomi Community Development Corporation (CPCDC), a Native Community Development Financial Institution located in Shawnee, Oklahoma, has worked with ONAC to open sixty-three ONAC-funded CSAs for Citizen Potawatomi youth. Each of the accounts was funded with an initial \$100 opening deposit.

Partner lead: *Cynthia Logsdon, CFO/CCO, Citizen Potawatomi Community Development Corporation.*

Ponca Tribe Head Start (Ponca City, Oklahoma) (ONAC CSA Partner)

Ponca Tribe Head Start, located in Ponca City, Oklahoma, held a CSA account opening event on November 3, 2016. During that event, thirty accounts were opened for the children enrolled in their Head Start program, their siblings, and the children and grandchildren of their staff members. At the event, Ponca Tribe Head Start, directed by Linda Rieman, provided a meal for their families, and the children participated in a Native arts project and other activities while the parents and staff went step-by-step through the Oklahoma 529 College Savings Account application with Mrs. Finsel of ONAC.

Partner lead: *Linda Rieman, Director, Ponca Tribe Head Start.*

Housing Authority of the Seminole Nation (Wewoka, Oklahoma) (ONAC CSA Partner)

On March 31, 2017, the Housing Authority of the Seminole Nation of Oklahoma, located in Wewoka, Oklahoma, worked with ONAC to open eighteen CSAs for the youths living in their housing stock. At the account opening event, Seminole artist, Enoch Kelly Haney, attended and encouraged the youth to pursue

their dreams, presented slides of his artwork, and talked with the youth about making art.

Partner lead: *Rebecca Stone, Executive Director, Housing Authority of the Seminole Nation of Oklahoma.*

Osage Nation Financial Assistance Department (Pawhuska, Oklahoma) (ONAC CSA Partner)

On July 19, 2017, ONAC and the Osage Nation Financial Assistance Department, located in Pawhuska, Oklahoma, met with the parents of youth and young adults, ages 16-22, who were participating in the Osage Nation Summer Youth Employee Program, to open thirty-five CSAs (CSAs were also opened for the siblings of the youth employees). On December 6, 2017, an additional ten accounts were opened for youth served by the Osage Nation Tribal TANF Program. On August 20, 2019, ONAC funded twenty-two more accounts. The total number of accounts opened by parents to date, in partnership with the Osage Nation Financial Assistance Department, is sixty-seven accounts.

The Osage Nation Foundation made a grant award to ONAC to fund forty-seven of those accounts for Osage youth up to age 18. The remaining accounts were funded with grant funds from First Nations Development Institute, with support of the Ford Foundation, and the W.K. Kellogg Foundation.

Partner leads: *Jennifer Oberly, Director, and Andrea Kemble, Program Coordinator, Osage Nation Financial Assistance Department.*

Housing Authority of the Peoria Tribe of Indians of Oklahoma (Miami, Oklahoma) (ONAC CSA Partner)

On October 26, 2017, ONAC and the Housing Authority of the Peoria Tribe of Indians of Oklahoma, located in Miami, Oklahoma, met with parents to open CSAs for youth, from ages birth through eight, who reside in tribal housing. Six accounts were opened for youth that evening, and six more were opened in April of 2018. In December 2018 and December 2019, ONAC attended their annual Christmas party and opened forty-five more accounts with the families.

Partner lead: *Peyton Westmoreland, Financial Education Coordinator, Housing Authority of the Peoria Tribe of Indians of Oklahoma.*

Modoc Housing Authority (Miami, Oklahoma) (ONAC CSA Partner)

On October 26, 2017, one family residing in Modoc Housing Authority housing, located in Miami, Oklahoma, attended the ONAC CSA account-opening event at the Housing Authority of the Peoria Tribe of Indians of Oklahoma. The Peoria Tribe invited all

Modoc housing residents to attend, to consolidate account-opening endeavors. The Modoc Tribe of Oklahoma is interested in opening additional accounts with Modoc families. They completed an Emergency Savings Account grant project with ONAC in October 2018.

Project lead: Robert Burkybile, Director, Modoc Housing Authority.

Wyandotte Nation (Wyandotte, Oklahoma) (ONAC CSA Partner)

On June 21, 2018, ONAC funded eleven CSAs for Native youth enrolled in the Wyandotte Nation Summer Youth Employee Program, located in Wyandotte, Oklahoma. Chief Billy Friend of the Wyandotte Nation attended the account-opening event and provided the welcome.

Partner lead: Debbie Dry, Grant Writer, Wyandotte Nation; Kim Garcia, Accounting Director, Wyandotte Nation.

14. Kiowa Tribe (Carnegie, Oklahoma) (ONAC CSA Partner and CSA Program Administrator)

On January 24, 2019, ONAC funded forty-seven CSAs for Native families with children attending the Kiowa Head Start Program located in Carnegie, Oklahoma. In April ONAC awarded a mini-grant award to the tribe and the tribe funded thirty-six CSAs for youth attending their Kiowa Head Start Program in Anadarko, Oklahoma.

Partner lead: Lahoma Zotigh, Grant Writer, Kiowa Tribe.

Absentee Shawnee Housing Authority (Shawnee, Oklahoma) (ONAC CSA Partner)

In August 2019, ONAC funded thirty-one CSAs for Native youth served by the Absentee Shawnee Housing Authority located in Shawnee, Oklahoma.

Partner lead: Sherry Drywater, Executive Director, Absentee Shawnee Housing Authority.

For more information about the ONAC CSA program, please contact Christy Finsel, ONAC Executive Director, at cfinsel@oknativeassets.org. To learn more about ONAC, please contact Mrs. Finsel, or go to <http://www.oknativeassets.org/>.

15. First Nations Development Institute and Gallup Central High School Pilot Youth Savings Program (Gallup, New Mexico)

During the 2015-2016 academic year, First Nations Development Institute (FNDI) collaborated with Gallup Central High School to offer financial education and fund twenty-three Youth Savings Accounts (YSAs) for Native students, as well as fourteen Children's Savings Accounts (CSAs) for their dependent children. Sarah Dewees, then Senior Director of Research for FNDI's Policy, & Asset Building Programs, Benjamin Marks, then Senior Research Officer at FNDI, Shawn Spruce, financial education consultant, and Arnold Blum, Gallup Central High School Financial Education Instructor facilitated this pilot.

Gallup Central High School serves student parents through a Graduation, Reality, and Dual-Role Skills (GRADS) program (a class for student parents). Through this project, students enrolled in GRADS



2019 ONAC Children's Savings Account opening event with youth from the Kiowa Tribe Head Start Program.

Photo credit: Kiowa Tribe.

participated in several Native-specific financial education sessions and a FNDI Spending Frenzy (a simulation where they receive a salary and have to plan to make purchases for a year).

Through the YSA/CSA pilot, students also received the matched savings accounts for themselves and their children. For the YSAs, they received \$50 in initial seed deposit funds. For their children, they received \$50 in initial deposit funds for a CSA. If the students saved \$50 to \$100 throughout the year, they received a \$50 match. FNDI worked to incentivize savings by providing raffle tickets for every \$5 saved. Of the program participants, the 9th-12th grade students ranged in age from 15-21 years.

During the program, thirty-two student deposits were made into the accounts, with eighteen of those deposits for \$10 or less. Fourteen additional student deposits ranged mostly from \$10.01 to \$40.01 (sometimes more). One student saved almost \$150 in a three-month period, while another deposited \$250 in their account from money received from their 2015 tax refund. FNDI offered custodial YSAs and CSAs so that they could track account activity. Because FNDI did not wish to remain custodian on the accounts past the initial academic year, at the end of that year they offered options for the students to transfer account funds to a combined savings account, convert the two accounts from custodial accounts to non-custodial minor's savings or regular savings accounts (depending upon the student parent's age), or withdraw funds from their accounts.⁸⁹

For more information about this program, contact Catherine Bryan, Director of Programs — Strengthening Tribal and Community Institutions, First Nations Development Institute, at cbryan@firstnations.com. To learn more information about First Nations Development Institute, go to <http://www.firstnations.org>.

16. Chief Dull Knife College Financial Savvy Program and People's Partner for Community Development (Lame Deer, Montana)

In April 2015, First Nations Development Institute (FNDI) contracted with Christy Finsel, a Native consultant, to provide technical assistance to the Chief Dull Knife College Financial Savvy Program staff as they designed and administered a Youth Savings Account (YSA) program for children who were dependents of their students.

In 1975, the Northern Cheyenne Tribe, by tribal ordinance, chartered Dull Knife Memorial College (renamed Chief Dull Knife College in 2001). The

college is located on the Northern Cheyenne Indian Reservation. Their Extension program was initiated in 1994, when the college was awarded land grant status and became a TCU (Tribal Colleges and Universities). Tommy Robinson, Chief Dull Knife College Extension Service Case Manager, administered this YSA program, with support from his supervisor, Yvonneda (Henry) Thompson, Chief Dull Knife College Extension Director. FNDI provided the funding for this program through support from the W.K. Kellogg Foundation.

With this YSA, student parents attending the tribal college are invited to open a Utah 529 College Savings Plan account for any of their children, birth to age eight. To participate in the YSA program, the student parents complete the YSA application created for the program, known as the Chief Dull Knife College YSA Program Application, as well as an application for the Utah 529 College Savings Plan (called the Utah Educational Savings Plan, or UESP when this program



2017 Chief Dull Knife College Graduates, Jeffery and Cheyenne Robinson, and their twin sons, Wind (left) and Major (right). Jeffery and Cheyenne opened Youth Savings Accounts (YSAs) for their sons as part of the Chief Dull Knife College Financial Savvy Program.

Photo by courtesy of Chief Dull Knife College Financial Savvy Program.

⁸⁹Deweese, Sarah. Personal communication. 16 September, 2016. For this program description. Dr. Deweese shared information about their program with Mrs. Finsel.

was initiated; now called “my529”). Chief Dull Knife College has not added their names to the accounts as account holders. The parents open the accounts for the benefit of their children. Once the parent opens the 529 college savings account, the tribal college provides a \$200 opening deposit check, which they directly send to UESP on the child’s behalf.

While the tribal college is located in Montana, like several other youth savings programs across the nation, they decided to open accounts through the UESP (in Utah) for a number of reasons. Legally, anyone can open a 529 college savings account for his or her child in virtually any state in the United States, whether they reside in that state or not. Parents may also open more than one 529 account for their children (such as one in Montana and one in Utah). Chief Dull Knife College chose the Utah 529 College Savings Plan because the performance, costs, reliability, and features rate higher than the two Montana 529 plan options. Another reason they chose to fund a 529 account in Utah is that there are no minimum contributions with the Utah plan. This allows for the parents to deposit additional smaller amounts of money in the account as they have those funds available. In comparison, the Montana Family Education Savings Program-Investment Plan requires a \$25 minimum deposit for periodic contributions or a \$15 minimum contribution through payroll deduction.

Chief Dull Knife College notes that a number of their student parents *do not pay* Montana state taxes. (If Northern Cheyenne tribal members earn all their income on the Northern Cheyenne Indian Reservation, then they are not required to pay state taxes —and the same applies to students who have tribal membership with other tribes if they reside on their own tribe’s reservation land).*For those student parents who do pay state taxes*, Montana passed a state tax parity for 529 deduction which makes a “Montana taxpayer’s contributions to a non-Montana 529 plan eligible for a state income tax deduction.” The maximum annual Montana deduction is \$3,000 for an individual and \$6,000 for a married couple filing jointly. Montana joined a small handful of states in adopting tax “parity” for 529-plan contributions. For further information, please see: http://www.savingforcollege.com/529_news/?page=plan_news&plan_news_id=1217.

An additional benefit of the Utah State 529 College Savings Plan is that the plan has the administrative flexibility to provide an omnibus account which allows UESP, with parental permissions, to share account data with the sponsoring organization (in this case, the

tribal college and the People’s Partner for Community Development). This aids the program administrators in both monitoring account activity, to better assure accuracy of deposits, and in completing a program evaluation.

The Chief Dull Knife College YSA program is linked to other financial empowerment programs that Chief Dull Knife College Extension provides through their Financial Savvy Program. This includes financial education, credit coaching, free tax preparation through a Voluntary Income Tax Assistance (VITA) program, and an adult Individual Development Account (IDA), a matched savings program. The IDA program represents a partnership with the local CDFI People’s Partner for Community Development initiative, and was partially funded by the HHS Assets for Independence program (this federal IDA program and funding source has ended). The IDA program is designed to help parents save for homeownership, small business, and post-secondary education expenses and has an 8:1 match rate. All the dependents of the current IDA graduates have a YSA.

As of May 2016, the tribal college completed the first pilot and ten student parents opened CSAs for their children. All the parents chose the moderate risk age-based investment option through UESP. To further educate the parents, the tribal college provided a UESP PowerPoint presentation, post-account opening, to show how, when further contributions are made to the account, the account could grow over time. In August 2017, the tribal college completed their second year of the program. Ten more student parents opened CSAs for their children.⁹⁰ As of October 2019, Tommy Robinson, working for People’s Partner for Community Development and with the Chief Dull Knife Tribal Extension office, funded ten more CSAs, with grant support from the Oklahoma Native Assets Coalition, Inc.

For more information about this program, contact Tommy Robinson, Case Manager, People’s Partner for Community Development, at tommyrobinson@gmail.com. To learn more about Chief Dull Knife College go to <http://www.cdkc.edu> and to learn more about the People’s Partner for Community Development go to <http://www.peoplespartners.org/>.

17. NAT\$VE in the BANK Initiative, National Congress of American Indians (National)

From 2015 to May 2016, the National Congress of American Indians (NCAI), Washington, DC, worked with the Native Financial Education Coalition (NFEC) to launch the “NAT\$VE in the BANK” initiative. This

⁹⁰Robinson, Tommy. Personal communications. 16 September, 2016 and 30 June 2017. Mr. Robinson shared information about their program with Mrs. Finsel. Sarah Dewees, formerly from First Nations Development Institute, also reviewed the description.

initiative promoted Native youths, age 12 to 25, to open accounts at a bank or credit union of their choice so that they might have early opportunities to learn to build relationships with financial institutions. NCAI and NFEC did not provide funding for the accounts or assist the youth with account opening activities at any particular financial institutions.

In the pilot, as part of the initiative, Native youth were asked to complete a four-step process then outlined on the NAT\$VE in the BANK pages on the Native Financial Education Coalition website. The steps are as follows:

Step 1: Complete an online financial education course, *Money Smart*, which is offered by the Federal Deposit Insurance Corporation (FDIC). As part of this step, youth were asked to complete both “Bank On It” (the estimated completion time was 30-40 minutes). After completing the modules, the youth were then asked to complete an online form for a completion certificate, and email an image of the certificate to nfec.ncai@gmail.com;

Step 2: Open a savings or checking account at a bank or credit union of their choice and then complete an online form (if the students already had an account open, they were still eligible to participate);

Step 3: Take a photo with a bank or credit union representative, post the image on NFEC’s Facebook page or Twitter account (#NATIVEintheBANK), and complete a related online form and;

Step 4: Share through words or art an expression of their financial goals in life and how they hope to achieve them, as well as complete an online form.

Once these four steps were completed, NFEC provided the youth with a “NAT\$VE in the BANK” t-shirt and a chance to win an iPad or iTunes Gift Card.

NCAI reported that 116 youth completed all four steps of the initiative, and more than 385 other youth completed at least one of the steps.⁹¹ This pilot initiative is now dormant, since the grant funding ended. NCAI and NFEC would like to continue to administer this initiative, if additional funding were to become available, and would adjust the process, going forward, based on lessons learned from the initial project.

If additional funding were available, according to Ian Record, NCAI Vice President of Tribal Governance and Special Projects, “Tribes and organizations could support NAT\$VE in the BANK by recruiting Native youth to participate, integrating the initiative into their youth

programs, and reaching out to local banks and credit unions to get them to participate. Banks and credit unions, meanwhile, could do their part by: accepting tribal IDs and a minimum initial deposit of \$25 to open accounts; waiving monthly account fees; hosting a NAT\$VE in the BANK fair at a bank branch or school in or around a tribal community, so that youth could open accounts; and contributing matching funds to initial deposits made to those accounts.”⁹²

For more information, contact Ian Record, Vice President of Tribal Governance and Special Projects, National Congress of American Indians, at irecord@ncai.org. To learn more about NFEC, go to <http://www.nfec.us>.

18. Kathryn M. Buder Center for American Indian Studies at Washington University in Saint Louis and American Heritage Bank Youth Savings Account Opening Project (Mannford, Oklahoma)

During the 2015-2016 academic year, Molly Tovar, then Director of the Buder Center for American Indian Studies and Professor of Practice at Washington University in Saint Louis (located in Saint Louis, Missouri), worked with American Heritage Bank to launch an opt-in pilot savings project in Mannford, Oklahoma, with upper elementary students enrolled in the Indian Education Program at Mannford Upper Elementary.

As part of the project, the Johnson-O’Malley Program (JOM) invited Native students to participate in a financial education session offered by Betty Calley of the American Heritage Bank branch located in Sapulpa, Oklahoma, on the last day of the academic year. If the students attended the one-hour presentation on savings, they received a handout noting that they were eligible to receive a \$50 savings voucher if they went to one of the American Heritage Bank branches, along with a parent or legal guardian, to complete the required paperwork. Students were given one month to complete this process, starting the day of the savings presentation. As part of their account opening experience, the youth were invited to tour the bank with a banking representative.

During the pilot project, thirty youth attended the financial education presentation and fifteen youth accounts were funded with a \$50 opening deposit.⁹³ Tovar & Wheeler, LLC, and American Heritage Bank each provided \$25 per student for the accounts. The accounts were minor’s savings accounts with the name of the parent on the account for the benefit of the child.

⁹¹Record, Ian. Personal communication. 22 November 2016. For this program description, Mr. Record shared information about their program with Mrs. Finsel.

⁹²Record, Ian. Personal communication. 22 September 2016.

⁹³Tovar, Molly. Personal communications. 7 October, 2016. Dr. Tovar provided the number of accounts opened during the pilot.



Johnson O'Malley 7th grade students at Sand Springs Public School holding their Certificate of Attendance after participating in the One Step Toward Financial Freedom program.

Photo by courtesy of Molly Tovar, Kathryn M. Buder Center for American Indian Studies.

In 2017, the Kathryn M. Buder Center for American Indian Studies was a collaborator on another initiative with American Heritage Bank, the Sand Springs Indian Education program, Sand Springs Public Schools, in Sand Springs, Oklahoma, and the Center for Social Development at the Brown School of Social Work at Washington University. On March 2, 2017, fifty-nine 6th, 7th, and 8th grade students attended a forty-minute financial education presentation entitled “One Step Toward Financial Freedom (OSTFF),” presented by American Heritage Bank at the Clyde Boyd Middle School, in Sand Springs. American Heritage Bank provided the funding for a \$50 savings voucher for American Indian youth who attended the presentation. To claim the voucher, the youth and their parent or guardian had thirty days from the time of the financial education session to go to one of their banking locations and open an account. Each of the students who participated in the OSTFF workshop received a \$50 voucher, and of the fifty-nine students who participated, nineteen students opened a savings account.

The Buder Center for American Indian Studies and the Center for Social Development at Washington University in St. Louis administered a pre- and post-assessment survey. To help promote the OSTFF

program, Susanne Sanders, Director of the Sand Springs Indian Education Program, distributed the program information to Native youth in Sand Springs Public Schools. This project also had the support of Sherry Durkee, the Superintendent of Sand Springs Public Schools.⁹⁴ The Sand Springs Indian Education Program, American Heritage Bank, the Kathryn M. Buder Center for American Indian Studies, and the Center for Social Development at Washington University in St. Louis have declared a goal of replicating this initiative with 6th, 7th, and 8th grade Native students.

For more information about these projects, contact Kellie Thompson, Director of the Kathryn M. Buder Center for American Indian Studies at kellie.thompson@wustl.edu. To learn more about the Center, go to <https://buder.wustl.edu>.

19. Hawaiian Community Assets Youth Match Account Program (Hawai'i)

From 2015 through summer 2016, Hawaiian Community Assets (HCA) provided a Youth Match Account program that they describe as a blend of an Individual Development Account and a Children's Savings Account program. While they have recently completed their pilot program, they hope to continue

⁹⁴Tovar, Molly. Personal communications. 5 January, 2017. For this program description, Dr. Tovar shared information about their program with Mrs. Finsel. Updates were provided on 28 June 2017.

to offer this statewide opportunity to Native Hawaiian youth, living at 80 percent or below of HUD Area Median Income.

Through this program, HCA provided forty-two youth, age 15 to 17, with a \$5 opening account deposit. HCA considered thirty-four of the forty-two youths to have proceeded to be active savers. Those thirty-four youths saved a cumulative total (not counting match funds) of \$4,000 in their accounts. While the accounts were not opened in the parents' names or with HCA as an account owner, parents did grant permission for their child to open a fee-free savings account at Bank of Hawai'i. The parents also gave permission for HCA to receive monthly transaction reports from Bank of Hawai'i. The youth were not required to make the deposits into the account from only earned income.

Through the program, participants received piggy banks and participated in financial education classes that HCA provided to the savers, utilizing the HCA Kahua Waiwai curriculum, *'Opio Edition* (geared towards middle school and high school youths). HCA also provided internship opportunities for three high school students from their thirty-four active savers in the program. HCA used the internships to train the high school students to assist them in teaching a

version of their financial education curriculum, the Keiki Edition (which is geared towards children up to age five), to Native Hawaiian preschool youth at community organizations such as the Papakōlea Community Development Corporation. During those classes for the preschool youth, the young children received a piggy bank and certificate of completion. From anecdotal evidence from Papakōlea Community Development Corporation (CDC), some of the preschool youth are now saving money in their piggy banks, though the Papokōlea CDC did not establish a formal Children's Savings Account program.

The high school interns deposited the stipends they received for their efforts into their youth match savings accounts. Each month of the pilot program, the high school saver with the greatest amount of savings, received \$100 from HCA for their account. Also, the saver with the second greatest amount of savings, received \$50 from HCA, and the other savers could win one of five \$20 incentives offered each month.⁹⁵

For more information about the programs, contact Lahela Williams, Program Director, Hawaiian Community Assets, lahela@hawaiiancommunity.net. To learn more about Hawaiian Community Assets go to <http://hawaiiancommunity.net>.

⁹⁵Williams, Lehela. Personal communication, 24 October, 2016. For this program description, Ms. Williams shared information about their program with Mrs. Finsel.

Notes



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