NATIVE FINANCIAL INCLUSION
POLICY TOOLKIT
Lessons Learned & Keys to Success
About the Native CDFI Network
The Native CDFI Network was formed in 2009 to unify Native community development financial institutions serving Native trust land communities, Native Americans, Alaska Natives, and Native Hawaiians. Currently, 74 certified Native CDFIs are located in 19 states across the country. The mission of the Native CDFI Network is to be a national voice and advocate that strengthens and promotes Native CDFIs, creating access to capital and resources for Native peoples. More information on the Native CDFI Network can be found at www.nativecdfi.net.

About the Northwest Area Foundation
The Northwest Area Foundation (NWAF) advances community-based culturally anchored solutions. NWAF supports organizations offering knowledge, tools, and training that offer people the economic freedom to pursue a better future for their families and communities. NWAF listens to its partners on the ground, learns about communities’ strengths and struggles, and leads by lifting up great work already being done. NWAF grantees work to build on the entrepreneurial spirit, strong community ties, and untapped potential within Native nations, communities of color, rural communities, and other resilient communities who have fewer opportunities to thrive on their own terms.

About Prosperity Now
Prosperity Now (formerly CFED) believes that everyone deserves a chance to prosper. Since 1979, we have helped make it possible for millions of people, especially people of color and those of limited incomes, to achieve financial security, stability and, ultimately, prosperity. We offer a unique combination of scalable practical solutions, in-depth research and proven policy solutions, all aimed at building wealth for those who need it most.
# Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Letter from the Executive Director</td>
<td>1</td>
</tr>
<tr>
<td>Background</td>
<td>2</td>
</tr>
<tr>
<td>About this Toolkit</td>
<td>4</td>
</tr>
<tr>
<td>Policy &amp; Advocacy Outcomes</td>
<td>8</td>
</tr>
<tr>
<td>Understanding Policy &amp; Advocacy</td>
<td>10</td>
</tr>
<tr>
<td>Building Policy &amp; Advocacy with your Native CDFI</td>
<td>12</td>
</tr>
<tr>
<td>Policy &amp; Advocacy Guidelines &amp; Restrictions</td>
<td>14</td>
</tr>
<tr>
<td>Native Financial Inclusion Policy Keys to Success</td>
<td>16</td>
</tr>
<tr>
<td>Lessons Learned</td>
<td>32</td>
</tr>
<tr>
<td>Appendices</td>
<td>34</td>
</tr>
</tbody>
</table>
Historically, there has been very little investment in Native communities, and that has left us behind in the areas of infrastructure, economic development, and asset creation. The good news is that there are many organizations out there working overtime to level the playing field and promote Native financial inclusion. In Montana, with a strong and expanding Native community development financial Institution (CDFI) presence, supportive Governor, Caucus of Native Legislators and partnership with the Montana Financial Education Coalition, we saw an opportunity to explore the question “what policies can we implement that create systemic and sustainable change?” With support from the Northwest Area Foundation and national partner Prosperity Now, we have been able to find and implement solutions for Native financial inclusion. The Montana legislature, with support from the Native American Development Corporation (NADC), developed the Native American Collateral Support Program to close gaps in equity and collateral that present challenges for Native American entrepreneurs. NADC and other Native organizations established a new and enduring Native American Committee of the Montana Financial Education Coalition to promote financial education and other financial inclusion strategies.

This Native Financial Inclusion Policy Toolkit is our way to share what we learned in Montana with advocates, such as the 74 Native CDFIs across the nation that are currently delivering programs to help Native American families increase financial capability and asset ownership, and who want to bring more economic prosperity into their communities. We hope this Toolkit will provide those advocates with inspiration, tips and tools to make that happen.

All the best,

Tanya Fiddler
American Indian, Alaska Native and Native Hawaiian communities continue to experience substantially higher rates of poverty and unemployment than other communities in the United States; and Native communities face a unique set of challenges that severely limit economic growth, workforce development, entrepreneurship, homeownership and other drivers of a healthy economy. Native communities have historically been unserved or underserved by conventional financial institutions leaving tribal citizens cut off from the economic mainstream. Montana has eight state recognized tribal governments and seven American Indian reservations. The seven reservations are: Blackfeet, Crow, Flathead, Fort Belknap, Fort Peck, Northern Cheyenne, and Rocky Boys. The seven reservations encompass a total of 5,947,306 acres, 9,293 square miles, or 6.3 percent of the state’s land base of 147,046 square miles. The combined population of the seven reservations is 66,598 or 6.7 percent of Montana’s total 2010 population of 989,415 as reported by the U.S. Census Bureau.

Prosperity Now’s Assets & Opportunity Scorecard, a powerful research and advocacy tool that helps paint a picture of household financial insecurity in the United States, reveals that in Montana – a state with one of the highest number of Indian reservations – state policies are doing little to improve financial security for residents. Prosperity Now’s other data resources show even more economic disparity in counties with majority Native populations. For example, in Glacier County where Montana’s Blackfeet Reservation is located, the population is made up of 66 percent Native Americans and 17 percent of residents are unbanked, while the Montana’s overall unbanked population is less than 7 percent.

In many areas, Native CDFIs provide the only affordable alternative to predatory financial service providers. Native CDFIs in Montana and across the country are providing access to credit with a wide
range of loans including microenterprise, small business, consumer, commercial, and affordable housing and homeownership loans. They also offer development services like entrepreneurship training and home buying education. This encourages private sector development in Native communities because Native consumers, entrepreneurs, and potential homebuyers have the information and training they need to improve their credit, establish businesses, and purchase homes. Native CDFIs are also helping to improve the inadequate physical infrastructures so that Native communities are more supportive of business development and home ownership, two key ways that individuals and communities build wealth and financial stability.

It is within this context that the Northwest Area Foundation funded NCN to launch the three-year Native Financial Inclusion Policy Initiative designed to increase the engagement and impact of Native organizations in Native financial inclusion. The specific goals of the initiative were to:

1. Support the passage of state Native American Collateral Support legislation that would provide collateral support security for lenders making loans with Native American-owned businesses that lack sufficient collateral/equity for a business loan.

2. Promote the passage of state Children’s Saving Accounts (CSA) legislation that would expand educational and economic opportunity for low- and moderate-income families in Montana, including Native families.

3. Assist Native nonprofits in the development and/or expansion of programs that would implement Native CSA programs and other financial inclusion strategies.


Native American Development Corporation (NADC) was selected as a partner in the initiative given its leadership role at both the state and tribal levels in advocating for the issues of Native Americans in Montana as a statewide Native CDFI. Loren White Jr. represented NADC.

In addition, in the second phase of the initiative which involved the statewide Children’s Saving Accounts legislation and tribal financial inclusion goals, it made sense to bring on two additional partners: NACDC Financial Services led by Executive Director Angie Main and People’s Partner for Community Development led by Executive Director Sharon Small. Each of these organizations has expertise in delivering Native financial inclusion strategies in their communities, has interest in the state and tribal goals, and has public policy and advocacy as part of their organizational priorities.
Support the creation and implementation of a Native American Collateral Support Program.

In 2015, during the first year of the Native Financial Inclusion Policy Advocacy Initiative (FI Initiative). NCN and NADC together with other advocates were able to support the successful passage and implementation of state legislation to establish the Native American Collateral Support (NACS) Program. The NACS Program addresses access to capital issues by providing collateral support security for lenders making loans with Native American-owned businesses that only lack in sufficient collateral/equity for a business loan according to their loan risk profiles, if all other aspects of the credit analysis are satisfactory: cash flow, climate, character, and credit-worthiness. NACS was funded by the Montana Legislature in 2015 with $500,000 in seed capital and is administered by the Montana Department of Commerce (Montana DoC), Office of Tourism and Business Development.

Montana DoC is the first state agency in the country to launch a collateral support program specifically for Native business owners. Collateral support assistance is limited to five years, permitting the monies to recycle back to the fund to support new borrowers. In addition, Certificates of Deposit (CDs) are kept with participating banks to secure a loan to a Native borrower. Annually, portions of the CDs are revolved to the program to support the next collateral support deal. Emerging Native American business owners now have an additional source of collateral when their local lender is seeking to provide a loan for business expansion, the purchase of equipment and other assets and the purchase of an existing business.
To date, two Montana financial institutions have utilized the NACS Program to make loans to their clients:

- Members of the Confederated Salish and Kootenai Tribes utilized the NACS Program to acquire funding for an expansion of their rafting recreation company located in Polson, MT. The loan was used to purchase property and construct a new warehouse. Glacier Bank was the lender and the total loan amount was $265,000, with $65,000 provided by MT NACS. The company retained 12 employees and created an additional two positions with the loan.

- Using the NACS Program, members of the Fort Peck Assiniboine & Sioux Tribes were able to secure a loan to purchase a NAPA Auto Parts store located in Wolf Point, MT. First Community Bank was the lender and the total capital secured for the purchase of the business was $454,000 with $379,000 provided by the bank, utilizing $100,000 from the MT NACS. An additional $75,000 was provided by Great Northern Development Corporation (a local CDFI) to complete the finance package. There were 3 positions retained with the creation of 2 additional positions.

Montana DoC and the NACS program currently have 4 additional prospective borrowers in various stages of underwriting with the financial institutions.

For more information, visit: http://marketmt.com/NACS/CollateralSupport/Information

- Promote the passage of state Children’s Saving Accounts (CSA) legislation.

   Over 1.3 million American children born each year – and more than half of Native children – are born into families with negligible savings to invest in their futures. Research demonstrates that children’s opportunities depend on their families’ assets. As a result, many Native children lack opportunities in education, business and homeownership that other children have. Children’s Saving Accounts have the potential to expand educational and economic opportunity for low- and moderate-income families of all races and ethnicities. Research indicates that low- and moderate-income children with college savings of just $500 or less are 3 times more likely to enroll in college and 4 times more likely to graduate. Family ownership of assets can give children a transformative sense of possibility and hope for the future.

   NCN and NADC brought together a small but strong coalition of Native and non-Native financial inclusion leaders with a plan to support the introduction of a statewide CSA bill in the 2017 Montana legislative session. A critical partner was NACDC Financial Services which has been operating a CSA program since 1996. However, the Montana legislature was not receptive to the bill because the state was in a budget deficit. We continued to promote CSAs and coalition member Reach Higher Montana, which had introduced and advocated for a CSA bill in the 2015 legislative, is now pursuing a privately funded CSA program for Montana that would be supportive of Native financial inclusion.

   - Assist Native nonprofits in implementing Native CSA programs and other financial inclusion strategies.

   NACDC Financial Services through its Mini-Bank CSA program, has been providing hands-on means for kids to learn the financial basics that will serve them in their adult lives since 1996. NACDC Financial Services is a recognized leader in the national CSA movement, in Indian Country and among the tribes in Montana. Mini-Bank is designed to provide an educational process so students have the opportunity to engage in banking business practices and to participate in the program as a customer by establishing and using a savings account. Savings accounts are opened with $3.00 and child’s social security
Students develop their own bank Board of Directors. Directors develop policies and procedures, establish new accounts, act as clerks to take deposit transactions and serve until they graduate from high school. NACDC Financial Services works with tribes to find new sites and train those sites in how to run a Mini-Bank Financial Literacy Program using its Train-the-trainer Manual for interested schools, individuals and organizations. NACDC Financial Services utilizes a variation of the FDIC Money Smart curriculum which is supplemented with other NACDC Financial Services sources. NACDC Financial Services also provides a staff person to oversee the program at each site and establish “Banking Days.”

NACDC Financial Services, with support from the FI Initiative, was able to leverage its CSA Mini-Bank work to help 16 Native high school students participate in the Montana Money Magic program offered by Reach Higher Montana (formerly Student Assistance Foundation). Montana Money Magic was presented in two modules providing students an opportunity to gain financial knowledge. The first module focused on gaining financial literacy, and the second module focused on building personal savings and earning matched savings for future college expenses. Financial literacy sessions were taught at the local NACDC Financial Services office by Reach Higher Montana’s Great Falls advisor, Allen Heisler. The sessions covered 16 different topics ranging from setting financial goals, to saving and investing in the future.

Students who completed financial literacy sessions had the opportunity to participate in the saving module of the program, and earn matched funds at a rate of $3 for every $1 saved. The goal for the students was to save $450, to earn the maximum match of $1,350. The match funds were used by the students to help cover some of the costs associated with post-secondary education. Students saw this as a welcome incentive to participate fully in the program, and the total dollar amount saved among the 16 participants was $7,200, leveraging $21,600 in match funds. Match funds were used by the students to purchase school-related items including lap top computers and other supplies such as backpacks and cases to help keep those computers safe. The purchase of these items helped to support the students’ educational goals by providing resources they may never have had otherwise, as well as providing them with a solid foundation of financial literacy and saving skills that can help them throughout their lives.

The collaboration between NACDC Financial Services and Reach Higher Montana opened the door for these students to pursue successful college careers. The participating students are currently planning to attend college in the future. Some are focusing on staying in the state of Montana and are pursuing degrees ranging from psychology to education. Others are considering Ivy League schools, such as Stanford and Brown Universities and studying to become physicians. The Montana Money Magic Program opened the door for these students to pursue successful college careers. The collaboration with NACDC Financial Services also provides a model for organizations like Reach Higher Montana to expand their reach to new markets and to be more financially inclusive through partnerships with Native CDFIs.

The FI Initiative also supported NACDC Financial Services in the Piikani Money Awareness Campaign, Just Don’t Blow It, a grassroots pilot program operated by a broad coalition of organizations and agencies working together to support Native landowners on the Blackfeet Reservation who received offers from the Department of the Interior under its Land Buy Back program. When large amounts of “sudden money” are injected in a relatively low-income community there is a higher risk of residents being taken advantage of by predatory sellers of goods, becoming a victim of financial abuse, or missing financial opportunities such as becoming a homeowner, starting a business, or saving for education. The campaign fosters awareness of
predatory practices and scams, builds knowledge of beneficial financial practices and opportunities and promotes financial readiness among the Native landowners who may be receiving payments. The “Just Don’t Blow It” campaign addresses:

- Avoiding falling victim to financial fraud, scams and predatory sellers of goods.
- Preventing elder financial abuse.
- Investing in the future by purchasing a home or starting a business.
- Smart investing and saving.
- Becoming “banked.”
- Understanding how the impact of land buy-back monies could affect lease income and public benefits.
- Cultivating financially savvy youth.

To date, over 1,000 Native landowners have been trained and are now prepared for the Land Buy Back Program.

For more information, visit http://pikanimoney.org on the web and on Facebook at https://www.facebook.com/PiikaniMoney.

Promote Native Financial Literacy through the Montana Financial Education Coalition.

The Native Financial Inclusion Policy Initiative created a Native American Committee of the Montana Financial Education Coalition (MFEC) to actively foster the implementation of policies and programs that create more Native financial inclusion in Montana. The purpose of the MFEC Native American Committee is to identify the financial capability needs of Montana’s Native communities, especially youth, and to help match available financial education products and services with the organizations serving Native youth. Members of the MFEC Native American Committee include: tribal colleges, K-12 schools, Native youth organizations, tribal housing departments, Native community development financial institutions, Native American Boys and Girls Clubs, and other interested MFEC members. MFEC board member Loren White, Jr. serves as the committee chair. Moving forward, the work of the MFEC Native American Committee may include the following tasks:

- Conduct instructor training in Montana for relevant financial education programs, such as Building Native Communities: Financial Skills for Families from First Nations Oweesta Corporation.
- Identify potential MFEC members interested in expanding their services to Montana’s Native communities, such as EverFi.
- Explore the need for training for non-Native financial education stakeholders to expand their knowledge about effective ways to partner with Native organizations.
- Identify potential tribal, state, and federal funding sources to support financial capability programs for Native youth.
- Support pilot efforts in Native communities so that they can be replicated in other Native communities across the state.
- Provide opportunities for peer sharing and learning through periodic in-person and virtual meetings.
Our policy work through the Native Financial Inclusion Initiative resulted in the passage of the groundbreaking Native American Collateral Support (NACS) legislation, which created a program to support Native American entrepreneurs. Following the passage of NACS, two Montana financial institutions utilized the NACS Program to make loans to their clients. Four additional prospective borrowers who are tapping into the NACS Program are in various stages of underwriting with the financial institutions.

By advocating for the passage of a state Children’s Saving Accounts (CSA) legislation, we leveraged our partnership with the Montana Financial Education Coalition to promote financial inclusion, and also helped increase capacity of three Native CDFIs (NADC, NACDC Financial Services and People’s Partner for Community Development) to implement CSA programs and other financial inclusion strategies.
During the Native Financial Inclusion Initiative, our project partner NACDC Financial Services launched a collaborative effort with Reach Higher Montana to promote the Montana Money Magic Financial Education and Scholarship Program to Blackfeet Nation high school students in Browning, Montana. As a result of this partnership, a total of sixteen Blackfeet Nation high school students were awarded scholarships, completed financial education modules, and participated in a matched savings program. Each youth participant saved $450 and received $1,350 in matching funds for a total of $1,800 that supported the attainment of educational goals. Cumulatively, the youth participants saved a total of $7,200, leveraging $21,600 in match funds.

**STATEWIDE CHILDREN’S SAVINGS ACCOUNT PROGRAM**

- 1 // Statewide Children’s Savings Account Program in development through Reach Higher Montana
- 1 // Native American Committee of Montana Financial Education Coalition created
- 3 // Native CDFIs with increased capacity to engage in Native Financial Inclusion Policy Advocacy
Understanding what policy and advocacy is and who the players are is the first step in advancing your Native CDFI’s community impact.

## UNDERSTANDING POLICY & ADVOCACY

<table>
<thead>
<tr>
<th>Public Policy</th>
<th>Advocacy</th>
<th>Lobbying</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Policy can generally be defined as the action (or inaction) taken by the government, including tribal government, with regard to a particular issue. It is an attempt by the government to address a public issue by enacting laws, regulations, executive orders, judicial rulings, etc. that affect the public realm.</td>
<td>Advocacy, whether by an individual or a group, aims to influence public policy. It may be motivated from moral or ethical principles or simply to protect an asset of interest, and includes identifying, embracing, and promoting a cause. Advocacy can include many activities that a person or organization undertakes including media campaigns, public speaking, community organizing, commissioning and publishing research, and lobbying.</td>
<td>Lobbying is a form of advocacy. Lobbying is an attempt to influence public officials in support of, or in opposition to, legislative proposals. Lobbying includes communicating with legislators and their staff directly and encouraging others to contact their legislators. There are two types of lobbying—direct and grassroots. Direct Lobbying is a communication (e.g., letter, email, phone, personal visit) with a legislator (federal, state, tribal, or local) or legislative staff member that refers to specific legislation and takes a position on that legislation. Specific legislation includes bills that are introduced as...</td>
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Direct lobbying also includes communication with other government officials if the principal purpose of the communication is to influence legislation.

Grassroots Lobbying is a communication with the public that refers to specific legislation, reflects a view of that legislation, and contains a call to action, such as identifying legislators that are in support or opposition of the legislation or telling the recipient to contact a legislator for the principal purpose of influencing legislation.

Legislators & Government Entities
A legislator is someone who writes or passes laws and can be a member of a legislative body, part of a government entity. Legislators are usually elected into office and include: senators, congressmen and congresswomen, governors, members of the House of Representatives, tribal leaders, tribal council members, mayors, and city council members. Depending on your particular Native community there may be others that are not listed.

Nongovernmental Groups that Influence Public Policy
Shaping public policy is a multifaceted process that involves numerous groups. Sometimes these groups collaborate with each other to influence public policy. Groups that often influence legislative decisions include the media, special interest groups, public policy research organizations, trade associations, labor unions, individuals and private sector business, state and local associations, political parties, and foreign governments.
In order to become effective in the policy and advocacy arena and advance your community impact, it is important to build capacity within your Native CDFI. Consider the following points to develop an action plan for building your policy and advocacy agenda:

**ADVOCACY GOALS AND AGENDA**
- To what extent is advocacy a clear part of your organization’s mission, goals and strategy?
- Do you have a written advocacy agenda?
- What are your advocacy goals and objectives?
- Will you seek to affect national, state, or tribal policies?

**MANAGEMENT**
- Which employees are responsible for advocacy?
- What percentage of your operating budget is designated for policy advocacy?
- In what ways are you challenged from a staffing or resource standpoint?

**LEADERSHIP**
- To what extent is your board engaged in and committed to advocacy?
- To what extent is executive leadership engaged in and committed to advocacy?
- What organizational structures are in place to support advocacy (e.g., a public policy committee, an advisory committee, a board committee, etc.)?

**STRATEGY, STRATEGIC PARTNERSHIPS AND NETWORKS**
- What strategic partnerships, networks or coalitions are you involved with and what role do you play?
- How do these networks help you meet your advocacy goals?
- How does your policy agenda fit into the broader goals of these networks?
- How do you engage and mobilize your constituents and other members of the community that are affected by or can influence this issue/policy?
- How do you build and maintain working relationships with relevant policymakers (e.g., legislators and their staff, administrators, etc.)?
As a Native CDFI, you most likely are a non-profit organization that receives funding from the federal government, and there are certain restrictions on your policy and advocacy activities. There are some general guidelines to follow, however, please consult with your legal counsel to get complete information.

Non-Profit Organizations
As a 501(c)(3) organization, the IRS imposes limits on your lobbying expenditures. Lobbying, by IRS standards, is defined as attempting to influence legislation and can be either grassroots lobbying or direct lobbying. All 501(c)(3) organizations are absolutely prohibited from engaging in activity that supports or opposes a candidate for public office.

Federal Funding Recipients
Federal funds are not to be used in ways that promote particular candidates for public office, support partisan political activities, influence legislative action, or influence decisions to award grants or contracts to particular recipients of federal funds.

Although there may be restrictions on your policy and advocacy activities, there is still much you can do.
WHAT ISN’T LOBBYING?

A communication with the general public reflecting a view about specific legislation is not lobbying if it does not contain a call to action.

It is not lobbying to meet with legislators to educate them about a broad social problem like poverty in Native communities, as long as you do not express a preference for a specific legislative proposal to address the problem, such as enacting a permanent Native set-aside in the CDFI Fund’s appropriations.

Lobbying restrictions do not apply to activities including: nonpartisan education or informational efforts; gathering, analyzing and reporting information on legislative or regulatory actions; providing advice or requested assistance from legislators; testifying before legislative bodies; commenting on regulatory actions; or advocating general support for particular programs.
Through our efforts in Montana, NCN and our partners have learned important lessons that we refer to as Keys to Success. We’ve collected a number of these keys to help guide Native Financial Inclusion policy efforts, along with some helpful resources for each Key to Success component.
CN and its Montana partner NADC along with Joanna Donohoe of Seven Sisters Community Development Group, LLC, a technical assistance provider for the Initiative, formed the core group that would execute the state and tribal FI Initiative policy goals. Jointly, they crafted a Native Financial Inclusion in Montana Policy Strategy that would include a coalition, which would later become the first Native American Committee of the Montana Financial Education Coalition. The strategy required the following:

- Identifying Target Populations
- Defining a Policy Agenda
- Creating a Logic Model
- Crafting Messages
Identifying Target Populations

The first step in developing a Native Financial Inclusion Policy Strategy is to identify the target population you seek to serve. In Montana, we chose Native entrepreneurs and Native children because both would benefit greatly from programs that would create more Native financial inclusion. Entrepreneurs are a priority for the Governor of Montana, who has numerous programs for entrepreneurs designed to create a stronger “Main Street,” and we hoped to take advantage of the state’s entrepreneurial spirit to promote more support for Native entrepreneurs. This led to our work on the Native American Collateral Support Program.

We used data from the Prosperity Now Local Data Center and the Annie E. Casey Foundation Kids Count Data to learn about family and child poverty levels in Montana’s counties and confirm that there is a need for children’s saving accounts. We were aware that previously introduced CSA legislation in Montana did not have a Native focus and decided to work to promote Native CSAs at the state and tribal levels.

Once you know your target population, decide who are you trying to reach to have an impact for your target population? This is your “target audience.” Is it community members, tribal council, state legislators? Get to know these people, and get to know them well. What backgrounds do they come from? What are their interests? What motivates them?

Defining a Policy Agenda

A clearly defined policy agenda will guide your public policy activities. The policy agenda should be flexible enough to respond to issues as they arise. In Montana, our policy agenda was clearly defined as Native financial inclusion. It was also flexible in terms of what specific strategy we thought would get the most traction. The Native American Collateral Support Program aligned well with our policy agenda, and we were able to help promote its passage into law. We were less successful with our Children’s Saving Account legislative strategy for the reasons described above, but since we were intentionally flexible, using and adaptive strategy, we were able to shift gears and successfully pursue the creation of the Native American Committee of the Montana Financial Education Coalition. The NAC will now continue the work that was started by the Initiative to promote Native Financial Inclusion in Montana.

Creating a Logic Model

There are many definitions of a logic model, but one of the best comes from the W.K. Kellogg Foundation, “A logic model is a systematic and visual way to present and share your understanding of the relationships among the resources you have to operate your program, the activities you plan, and the changes or results you hope to achieve.” (W.K. Kellogg Foundation 2004) There are also many ways in which logic models can be presented, but the underlying purpose of creating a logic model is to determine the “if-then,” or causal, relationships between the elements of the effort.

CHECKING THE LOGIC OF YOUR MODEL

- Are there causal relationships between the actions and outcomes?
- Are the outcomes measurable?
- Are all the affected groups included?
- Is the model as simple as it can be? Does it have all the necessary information?
- Does the timing of activities and outcome expectations match up?
- Is the plan doable with the resources and time available?

Logic models are useful for planning policy advocacy because it provides a picture of how your effort is supposed to work, and keeps participants in the effort moving in the same direction by providing a common language and point of reference. (Community Tool Box, Chapter 2 Section 1. Developing a Logic Model or Theory of Change, http://ctb.ku.edu/en/table-of-contents/overview/models-for-community-health-and-development/logic-model-development/main). Going into detail about how to develop a logic model for your advocacy effort is beyond the scope of this toolkit so we have listed a number of excellent resources, below.

Crafting Messages

The final element of a Native Financial Inclusion Policy Strategy is crafting effective messages to help you accomplish your policy goals. Effective messages take into consideration the viewpoint, needs and concerns of the target audiences. Effective messages:

Are Clear and Concise. Does the audience get the message, the main idea, the point? What does the message instantly communicate?

Make a Connection. Not only does the audience “get it,” but it resonates with them, has meaning and significance for them, and usually triggers an emotional response. When connection is there, it will spark new behaviors and actions.

Have Credibility. The audience believes who is saying it, what is being said, and how it is being said. Even if the audience understands and connects to your message, they will completely disregard it if they don’t believe it is coming from a credible source.

Are Contagious. You want your audience to catch the message and spread it around. To be contagious, a message has to be energetic, new, different, and memorable. It should also evoke a vivid emotional response, have “talk” potential, and motivate the target to do something.

The target audiences for Native financial inclusion in Montana are state and tribal policymakers, so it was critical that messages were developed that were in their language and in the forms of communication they are accustomed to. Having access to policymakers is critical so you can ascertain their language and communication styles, and make and maintain contact with them over time to receive important feedback. In Montana, we had access to Jason Smith, who leads the MT Governor’s Office of Indian Affairs for Governor Bullock. NADC had a relationship with Mr. Smith and was able to learn which messages resonated well with state policymakers, which led to the passage of the Collateral Support Program in 2015. NCN’s relationship with Tom Jacobsen who is both the Executive Director of Rural Dynamics Inc, a statewide nonprofit that promotes financial inclusion, and a state legislator, gave us access to information about legislative priorities for the state in 2017. These priorities did not include our policy goal of promoting Children’s Saving Accounts due to the budget deficit. Being prepared to change in response to feedback is important, so we ultimately decided not to pursue the strategy based on the information we received.
First Nations Development Institute invests in and provides technical assistance and other supports to Native CSA programs. FNDI is a tremendous resource to the Native CSA field, with many reports available in the Knowledge Center on their website: http://www.firstnations.org/knowledge-center

Prosperity Now Assets & Opportunity Local Data Center supports advocacy efforts by providing local-level household financial security data and publications to make strategic decisions for effective policies and programs. You will find a host of resources, including estimates of household wealth and financial access for thousands of cities and counties in America through an interactive mapping tool as well as more in-depth data profiles for a growing number of cities. http://assetsandopportunity.org/localdata/about/

Annie E. Casey Foundation Kids Count Data Center enriches local, state and national discussions concerning ways to secure better futures for all children — and to raise the visibility of children’s issues through a nonpartisan, evidence-based lens. In addition to including data from the most trusted national resources, the KIDS COUNT Data Center draws from more than 50 KIDS COUNT state organizations that provide state and local data, as well publications providing insights into trends affecting child and family well-being. http://datacenter.kidscount.org/

Prosperity Now Children's Saving: https://prosperitynow.org/issues/childrens-savings

Children's Savings Directory Highlights in Numbers: https://prosperitynow.org/articles/childrens-savings-directory-highlights-numbers

Prosperity Now: Cities and States Developing Creative Approaches to Fund Children's Savings: https://prosperitynow.org/resources/cities-and-states-developing-creative-approaches-fund-childrens-savings-accounts


Community Tool Box helps advocates in assessing community needs and resources, addressing social determinants of health, engaging stakeholders, action planning, building leadership, improving cultural competency, planning an evaluation, and sustaining efforts over time. Community Tool Box, Chapter 30 Section 7. Developing a Plan for Advocacy, http://ctb.ku.edu/en/table-of-contents/advocacy/advocacy-principles/advocacy-plan/main

Native Financial Inclusion Policy Initiative Logic Model (see Appendix A)


The Campaign Workshop produces and target direct mail, digital and print advertising as well as provides general strategy for political campaigns and issue advocacy. They have a blog that sends out helpful advocacy messaging tips twice a week. Here’s an example on this topic of crafting messages: https://www.thecampaignworkshop.com/advocacy-message
As mentioned above, the Native Financial Inclusion Coalition ultimately transformed into the Native American Committee of the Montana Financial Education Coalition. We built NAC by engaging in the following activities:

- Identifying Coalition Members
- Building the Coalition Infrastructure
- Gathering Information

Identifying Coalition Members
Coalition members can be identified by exploring partnerships you have with other nonprofit advocates who have demonstrated interest and capacity in advocating for Native financial inclusion. When looking beyond these existing relationships to other potential coalition members, ask yourself what the groups can bring to the coalition that would be useful, valuable or a resource in advocating for Native financial inclusion. Consider the ways the potential coalition members’ missions align with the coalition’s goals, and any challenges you may have in reaching out to them. Collaborate with community-based organizations that serve Native people or promote financial inclusion.

Building the Coalition Infrastructure
You will need to build coalition infrastructure to support and manage your public policy activities. You will must first dedicate financial resources to support
your public policy activities. This might include hiring public policy staff or consultants with a good understanding of the political environment and the ability to develop strategies to operate effectively in the environment. The staff and/or consultants must also have an understanding of the legislative process, tax and budget policy and the budget process in their state and the tribal decision making process. You will also need staff skilled in communicating with policymakers and organizing coalition partners, and an infrastructure for communicating regularly with members of the coalition and with policymakers. Allocating enough staff or consultant time to do policy work is a challenge for many organizations but it is essential for success.

It is critical to determine the function of the coalition as well. You will need to determine:

- Whether the coalition will be temporary or permanent.
- What issues the members of the coalition agree upon and what differences they have.
- What each member has to offer.
- What members have to give up and gain in joining the coalition.
- What conflicts and compromises can be anticipated and how they will be addressed.

Gathering Information

Gathering information will help you build your coalition and implement your policy strategy. Effective advocacy groups do this by convening a series of planning meetings, having key informant interviews and engaging in political landscaping. They also engage with statewide and/or national policy partners as a source of information. Effective advocacy groups use the information they obtain to carefully document the problems they are concerned about and appropriate solutions to those problems. Political landscaping is a way to map the systems and people that are involved and analyze the political context in a community. NCN and NADC staff were trained by Native Financial Inclusion Policy Initiative technical assistance provider Tanya Beer in how to do political landscaping and successfully applied this skill during a meeting of Montana Native Financial Inclusion stakeholders, hosted by the Federal Reserve Bank of Minneapolis Helena Branch in June, 2016. We learned that at the state level there were no viable coalitions to pursue either our state or tribal policy goals so we would need to lead any Native financial inclusion efforts. This was important information that determined our next steps towards achieving our policy goals.

FSG offers consulting, ideas, and resources for leaders working to create social change. FSG’s System Mapping is a helpful resource for political landscaping, http://www.fsg.org/tools-and-resources/system-mapping

SUCCESS KEY 3: SUSTAINING COALITION INVOLVEMENT

NCN and our partners sustained coalition involvement by employing a range of effective practices: engaging coalition members, spreading the word and sharing what we’ve learned.

Engaging Coalition Members
Once the coalition has been created and you have recruited members to participate in it, you will need to be proactive and stay in contact with the coalition members through effective and regular communication to keep them engaged. This is done most effectively by:

• Sending email updates.

• Having regular coalition calls and meetings.

• Organizing coalition meetings and events.

In Montana we did this through creating the Native American Committee (NAC) of the Montana Financial Education Coalition. The intentions of creating the committee were to institutionalize the work beyond the initial grant funding, by creating a continuum of community involvement through collaboration and communication among coalition partners. The NAC identified and created subcommittees to help work on specific tasks and mobilize resources to improve project outcomes.

Take the time to create a strong communications infrastructure to be able to communicate easily and frequently with your coalition members. This can be done by email but in some situations, personal phone calls may be more effective. The NAC meets in person, and by conference call for subcommittee meetings, on a regular basis. Between those meetings, email and a Facebook group have been established as the communications infrastructure.
Spreading the Word
You will also need to let other key stakeholders know about the coalition so they can be supportive of its efforts. Key stakeholders are usually the targets of advocacy efforts such as government agencies and policymakers but may include others who are unable to join the coalition but could still be supportive such as private foundations and regulators. Successful communication with key stakeholders occurs in the following ways:

- Sending email updates.
- Having regular check in calls.
- Inviting key stakeholders to attend coalition meetings and events.

Sharing What We’ve Learned
It is essential to share what the coalition is learning with the coalition members and with key stakeholders. In order to do that, you will need to continuously document the learning and use communication tools. Some ways to document learning include:

- Keeping a coalition contacts database to document all contacts you have with people that are related to the coalition’s activities. NCN used a Google Docs spreadsheet so the coalition would have access to it but there are numerous other ways to maintain contacts.
- Taking photos of coalition activities and sharing them on websites, social media, in reports and other communications channels. This includes celebrating the small successes because this brings the coalition together over shared positive outcomes.
- Drafting reports of coalition activities and sharing them with the coalition and key stakeholders at coalition meetings and events, and via email and posting on the website.
- Sharing success stories and other coalition news with traditional media and on social media.
PRESS RELEASE

Seriously consider whether a topic is newsworthy before distributing a press release. If you send too much useless information you will be determined a non-credible source by the press. Write clear, concise releases that tell a compelling story following these guidelines:

› Include a news hook in the headline and the opening sentence.
› Use a factual and objective tone and back up any claims with supporting data.
› Use the inverted pyramid structure to include the who, what, when, where, and why in the first paragraph.
EMAIL MARKETING

Email marketing has several advantages over traditional marketing methods because you can reach a broader audience, and it is much less expensive. People receive hundreds of emails every day, however a significant portion don’t get opened or get deleted. How do you successfully implement an email marketing strategy?

Limit your subject line to 5-8 words and make your brand recognizable. Think about your target audience and what information they are hungry for, and focus your content on their needs. Short and sweet is the key. Internet users don’t read. Instead, they scan. Use simple terms and include no more than 3-5 topics per email.

SOCIAL MEDIA

Social media platforms like Facebook, Twitter, and LinkedIn have become the #1 activity on the web and offer tremendous opportunities for gaining awareness and supporters for your policy and advocacy campaign. By creating a social media profile for your organization and updating your status on your social media platforms, you can generate traffic to your website, spread the word on policy issues, and even gain media attention. Consider posting articles and news stories, blog posts, videos, upcoming events, requests for participation, polls, a compelling question, or any free giveaways.

RESOURCES

Community Tool Box, Chapter 33 Section 2. Writing Letters to the Editor http://ctb.ku.edu/en/table-of-contents/advocacy/direct-action/letters-to-editor/main and Community Tool Box, Chapter 33 Section 19.

Personal relationships with policymakers are critical to the accomplishment of policy goals. One of the most challenging aspects of the Native Financial Inclusion Policy Initiative was creating and sustaining partnerships with state and tribal policymakers. While we were able to create the partnerships needed to pass the Collateral Support Legislation in the 2015 legislative session, state policymakers were confronted with a budget deficit in the 2017 legislative session that made them unable to invest in strategies such as Children’s Saving Accounts. Tribal policymakers were even harder to reach and we ultimately pulled back from trying to build the relationships to promote change at the tribal policy level. Nonetheless, we learned a number of effective practices and developed useful resources for creating partnerships with state and tribal policymakers.

Creating State Policymaker Partnerships

Step 1: Get to Know Him/Her
Research their voting history and background. If possible, identify a point of connection. Did you go to the same high school? Were you born in the same city? What is his/her voting history?

Step 2: Establish a Goal
Go into your meetings with state policymakers prepared and know what you want to get out of the meetings. Will you find out if this legislator is a supporter, undecided, or an opponent of your proposed ideas?

Step 3: Figure Out Who is Going to Say What
If you are going in to meetings with a group, discuss amongst yourselves how you will deliver your message. Remember to be clear and concise and to tell your story. Also demonstrate your power by letting the state policymaker know whom you represent. Numbers (as in numbers of votes) matter.
Step 4: Define Roles
When deciding how you will deliver your message, define the roles of all group members that will participate in the meetings. Will you be a meeting leader, story-teller, or a meeting recorder? All positions are important.

Step 5: Set an Agenda
Be prepared and go into your meetings with a set agenda. Since you requested the meetings, the policymaker will expect you to know exactly what you want to talk about. A good meeting format is:

INTRODUCTION & MEETING OVERVIEW
Introduce yourself and group members and let the policymaker know why you are here.

PERSONAL STORIES
Tell personal stories about your clients or community members. Share how this issue has affected your clients or community members.

THE “ASK”
Ask the policymaker directly, “Can I count on your support for _______?”
By asking directly, you can figure out if the policymaker is a supporter, undecided, or an opponent.

STRATEGIC RESPONSE
Depending on if the answer to the “ask” is yes, no, or undecided, provide a strategic response. If this policymaker is undecided, you might want to provide a little more information to help them make up their mind. You will probably want to formulate this response prior to the meeting.

WRAP UP & NEXT STEPS
Conclude your meeting and establish any next steps. Don’t forget to say, “Thank You.”

Creating Tribal Policymaker Partnerships
The first step in building tribal policymaker relationships is to find out what their priorities are and a way to link to their priorities. One way to do this is to meet with tribal policymakers at events and ask to be included as a presenter. NCN’s Executive Director Tanya Fiddler was invited by NADC’s Executive Director Leonard Smith to present before the Rocky Mountain Tribal Leaders Council. Her remarks about the need for Native financial inclusion in Montana were well-received and opened new doors because she was an outside national expert that they were more likely to listen to. While to date we have not had the success we had hoped in creating tribal policymaker partnerships, we learned a valuable lesson that outside experts are good messengers for tribal policymakers.

Effective advocacy groups intervene at multiple levels of the system when pursuing their objectives. In Montana we chose to work at the State and Tribal policy levels.

**Developing and Pursuing State Policy**

Advocates at the state level have the choice of two strategies to promote policy change, legislative action and administrative rulemaking (through state agencies), or some combination of both. The choice of which type of policy change to pursue usually stems from a strategic weighing of the real needs of the target populations in the state with the political realities of the types of change that policymakers are likely to support. Legislative action is developing and passing legislation. In Montana, both the Native American Collateral Support Program and statewide Children’s Saving Account strategy mapped well with the needs of the target populations and political realities. Legislative action:

- Can result in statewide funding.
- Requires commitment to the legislative process, which means time, resources, and persistence, and making yourself very familiar with the state legislative calendar.
- May be the only option because in some states, policy changes require statutory change that can only be made by the legislature.

There are a number of issues to consider when pursuing legislative action, including:

- Legislators are usually more connected to local communities; as a result, it may be easier to convince them of the worth of a program or approach that is operating in their district.
- Local legislators, representing the district in which the program is located, can be useful in helping programs to identify key agency staff, and also in getting introductions to members of key committees in the legislature. These contacts can be critical in the education and advocacy process.
- In cases in which agency staff are not supportive of a policy initiative, the legislature can dictate that they take certain policy steps. Legislatures can create whole new programs using state resources.

Administrative rulemaking is the use of existing programs or funding streams in a manner that does not require legislative action. Administrative rulemaking:

- May be a quicker approach for obtaining state funding.
- Requires interest and consistent support from a state office or funding entity.
Developing and Pursuing Tribal Policy

Our goal with the Montana tribes, which we were ultimately unable to achieve given the political climate, was to model the development and pursuit of tribal financial inclusion policy on the Shoshone-Bannock Tribes in Idaho tribal resolution acknowledging the importance of financial education and their desire to provide this service to their tribal citizens. The resolution encouraged tribal programs and departments to work with a local nonprofit provider called Partners for Prosperity. To date, they have offered financial education through a summer youth program, an after-school program at the high school, an addiction and recovery program, Temporary Assistance for Needy Families, and the tribal education department. Tribal councils have also enacted consumer protection codes to provide legal protections within their jurisdictions. The Blackfeet Tribe, Grand Traverse Band of Ottawa and Chippewa Indians, Cheyenne River Sioux, and Navajo Nation are examples of tribes who have adopted some type of consumer protection laws. First Nations Development Institute has developed a model consumer protection code which tribes can use as a starting point in their community.


Community Tool Box helps advocates help assessing community needs and resources, addressing social determinants of health, engaging stakeholders, action planning, building leadership, improving cultural competency, planning an evaluation, and sustaining efforts over time. Community Tool Box, Section 10. General Rules for Organizing for Legislative Advocacy http://ctb.ku.edu/en/table-of-contents/advocacy/direct-action/legislative-advocacy/main

Financial Inclusion Tribal Resolution Sample (see Appendix B)

First Nations Development Institute and its independent subsidiary, First Nations Oweesta Corporation (a community development financial institution), work in partnership with Native American tribes and communities throughout the U.S. to assist them in designing and administering financial and investor education programs. Projects range from helping individuals and families understand the basics of financial management – opening and maintaining a bank account and using credit wisely – to helping individuals understand financial markets and a variety of financial instruments for borrowing and saving. These organizations are a great resource for how to develop and pursue Native financial inclusion tribal policy. http://www.firstnations.org/programs/financial-empowerment

LESSONS LEARNED
The Native Financial Inclusion Policy Initiative has a number of important lessons learned that have been mentioned above. There are several that we thought should be highlighted as a final list in this Toolkit:

• Take the time to create a good communication infrastructure so you can keep coalition members informed and engaged.

• Allocate enough staff time for working on policy issues.

• Bring on a student intern or other staff who can do basic research.

• Collect more personal stories about financial inclusion policies that have had an impact in the community.

• Partner with other policy advocates in the state early on to maximize the power of these connections.

• Be willing to change your strategy as needed to adapt to the political climate.
APPENDICES

A. Native Financial Inclusion Policy Initiative Logic Model
B. Financial Inclusion Tribal Resolution Sample
NATIVE FINANCIAL INCLUSION POLICY INITIATIVE
LOGIC MODEL

STRATEGIES & TACTICS

FOR TRIBAL POLICY

➤ Meet with Native financial inclusion stakeholders at the NADC Conference to assess needs for tribal policy change
➤ Determine which tribal policy change to pursue
➤ Convene a series of meetings with key Montana stakeholders to assess the needed policy change to promote Native Children’s Saving Accounts and other financial inclusion strategies at the state level
➤ Identify one or two tribal communities that are interested in Native financial inclusion and work with them to pursue Native Children’s Saving Account tribal resolutions
➤ Have meetings with the tribal community leaders and other key decision makers to build buy-in and support
➤ Attend ceremonies, feasts, etc. to raise awareness among tribal members about Native Children’s Saving Accounts and other financial inclusion strategies
➤ Support the one or two tribal communities to actively pursue the Native Children’s Saving Accounts and other financial inclusion strategies

SHORT-TERM MILESTONES

➤ Educate Native stakeholders in Montana about the Financial Inclusion Project; provide information on needs and opportunities; assess interest in participating in effort
➤ Native financial inclusion stakeholders in Montana provide additional information through meetings about their needs for Native Children’s Saving Accounts
➤ At least one tribal community is identified and actively engaged in the promotion of Native Children’s Saving Accounts and other financial inclusion strategies
➤ The one or two tribal Children’s Saving Accounts and financial inclusion efforts are sustained over time with good communication, knowledge sharing and regular meetings to pursue their goals and intended outcomes

LONG-TERM MILESTONES

➤ NADC will have expanded its organizational capacity to engage on the tribal policy level as a thought leader to promote Native financial inclusion.
➤ The Native Children’s Saving Accounts and financial inclusion advocates in the one or two tribal communities are committed, aligned and empowered by their advocacy efforts in a new and powerful way.
➤ More allies are taking action to convince tribal decision makers to support these efforts; targeted media, community leaders, or decision makers are using our preferred message framing when they talk about Native Children’s Saving Accounts and other financial inclusion strategies
➤ More tribal decision makers are actively championing Native Children’s Saving Accounts and other financial inclusion strategies.
➤ An NCN Toolkit is created for the existing NCN Advocacy Guide to share the lessons of tribal policy development in Montana with other Native CDFIs seeking to promote policy change that supports Native Children’s Saving Accounts and other financial inclusion strategies.

FINAL OUTCOME

➤ More Native children in Montana have access to savings accounts and other financial inclusion strategies
➤ More Native CDFIs will have information and best practices about how to pursue similar state policy efforts.
Resolution (##____)
(Date)

TITLE: _______________________________________________________________________

WHEREAS, the (Name of Tribe) experiences low post-secondary educational attainment rates, due to limited access to mainstream financial products such as student loans and scholarships, and

WHEREAS, the Native CDFI Network (NCN) is a national member network working to promote economic development and financial inclusion in Native communities across the United States, and

WHEREAS, the Native American Development Corporation (NADC) is a statewide organization working to promote economic development and financial inclusion in Native communities across Montana and a member of NCN, and

WHEREAS, Native Children’s Savings Accounts provide Native children savers with financial education and funds for post-secondary education, and

WHEREAS, NCN and NADC are working in partnership to achieve their common goal of creating financial products that increase Native children’s ability to attain post-secondary education, through the development and delivery of Native Children’s Saving Accounts in Tribal communities in Montana, and

WHEREAS the (Name of Tribe) seeks to join the partnership between NCN and NADC to promote post-secondary educational attainment for (Name of Tribe) enrolled Native children under 2 years of age through the development and delivery of Native Children’s Saving Accounts, and

NOW THEREFORE BE IT RESOLVED by the (Name of Tribe) that Native Children’s Saving Accounts for post-secondary education be offered to all (Name of Tribe) enrolled Native children under 21 years of age.

BE IT FINALLY RESOLVED, that (Name of Tribe) carry out the intent of this resolution.
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