

A First Nations Data Governance Strategy

A Response to Direction Received from First Nations Leadership and Funded through Federal Budget 2018 in Support of the New Fiscal Relationship

Strengthening First Nations Institutions and Community Capacity

March 31, 2020

include all voices

with us, by us, for us

for the children yet to come

first nations must drive the standards

nothing about us without us

data sovereignty

relationships, partnerships, resources

training our people to work in our institutions

it's complex but absolutely possible

we need recognition as governments

education, training, capacity building

this work is being led by good values

ensure everyone is counted

we must shape the stories

analyze information from our worldview

repatriation of data

who we are and where we're from sets true indicators

self determination underpins it all

protecting the narrative about us

supporting communities with indicators that are true to them

our work is driven by who we are and the land we are from

data to support first nations communities

train community to know and use data

engagement process that listens first

we need to ally and work together

we're still early on this journey

indicators are grounded in culture and language

indigenous scientific methods

if we want to matter, we have to count and how we count matters

we have been successful and we can work in common

recognize local capacity and knowledge

how far away are we from the lives that the Creator intended us to live?

we have always been researchers protecting our traditional knowledge



FNIGC | CGIPN

The First Nations Information Governance Centre

Le Centre de gouvernance de l'information des Premières Nations

Vision

The First Nations Information Governance Centre envisions that every First Nation will achieve data sovereignty in alignment with its distinct worldview.

Mission

With First Nations, we assert data sovereignty and support the development of information governance and management at the community level through regional and national partnerships. We adhere to free, prior and informed consent, respect nation-to-nation relationships, and recognize the distinct customs of nations.

CONTACT US

FNIGC.CA



T: 613-733-1916

341 Island Road, Unit D
Akwasasne, ON K6H 5R7

and

180 Elgin Street, 12th Floor
Ottawa, ON K2P 2K3

© The First Nations Information
Governance Centre, 2020

”

“The ambition of our vision, our goals, and our hearts when it comes to self-determination and holding Canada to our treaty right, including the management and governance of our own data and information... we need to give voice to the people through ethical spaces and heal from historical harms created through unethical research practices created by colonization.... Colonization and assimilation only interrupted our history. It's time we rewrite our own history and assert our sovereignty.”

Chief Stanley Grier
First Nations Data Governance Strategy Summit
February 26, 2019

Table of Contents

Preamble	1
1.0 Executive Summary	3
2.0 The Case for Change — Drivers for a First Nations Data Governance Strategy	13
3.0 Responding to Budget 2018	27
3.1 FNIGC and its Regional Partners, At a Glance	27
3.2 Engagement Approach	33
4.0 The First Nations Data Governance Strategy Roadmap	39
4.1 The Big Picture, the Scope, and the Strategic Framework	39
4.2 The Vision for the Roadmap: A National Network of First Nations Regional Data Centres	43
4.3 The Overarching Guiding Principles	46
4.4 The First Nations Data Governance Strategic Pillars	51
5.0 Moving Forward – A Phased Implementation Approach	71
5.1 Critical Factors for Success	72
5.2 Notional Assessment of Maturity Levels	74
5.3 Phased Approach to Implementation and Key Steps, at a Glance	76
5.4 Why FNIGC and Its Regional Partners are Best Positioned to Implement the Data Governance Strategy.....	78
5.5 Mutual Accountability — How Success Will Be Accounted For	81
5.6 Proposed Accountability Framework	82
6.0 Recommendations and Next Steps	85
7.0 Glossary	89
8.0 Appendices	93
8.1 Appendix I — OCAP® Principles	93
8.2 Appendix II — FNIGC Board of Directors	96
8.3 Appendix III — FNIGC’s Regional Partner Governance Structures	97
8.4 Appendix IV — Gartner’s Data and Analytics Maturity Model	100
8.5 Appendix V — Ground-breaking National Surveys On Reserves	101
8.6 Appendix VI — Detailed Budget	102

”

"This matters to Canada because — like all governments — First Nations governments cannot be successful if their rights to self-determination and self-governance are not empowered by the governance of their own data."

Gwen Phillips
Ktunaxa Nation
FNIGC Board member



PREAMBLE

This report, and the recommendations within it, have been prepared by the First Nations Information Governance Centre (FNIGC) under the leadership of its Board of Directors. The need for a First Nations data governance strategy has been discussed at the FNIGC's Board table for many years, and is supported through several resolutions by the Chiefs-in-Assembly who have set out the priorities for this important initiative.

This report would not have been possible without the invaluable contributions of delegates from across Canada who generously participated in a national Data Governance Strategy Submit in Calgary, Alberta, co-hosted by FNIGC and the Alberta First Nations Information Governance Centre on February 26 and 27, 2019. The FNIGC acknowledges and is grateful to delegates for their tremendous dedication, and contribution to a better future for First Nations peoples.

The key messaging in this report reflects the aspirations, principles, and priorities for action as envisioned by First Nations, which have been articulated around a strategic framework that leverages best practices for effective data governance. This framework follows a careful examination of federal departmental data strategies, in particular, the Privy Council Office's Data Strategy Roadmap, the Statistics Canada's Data Strategy, and the Treasury Board Secretariat's policies. And while the framework created for this report is fairly consistent with those documents, it was adapted to reflect First Nations' unique priorities for data governance. The FNIGC thanks public servants in those departments for their support and advice during the development of this report.

While the First Nations Data Governance Strategy proposed in this report is fairly comprehensive, it is "evergreen" at this

stage as further work will be required to unpack, validate and/or refine key elements, including their endorsement by First Nations leadership.

Finally, the following details on key terms used in this report should be noted:

- The term **'rights holders'** primarily refers to First Nations governments, and by extension this includes First Nations' citizens. First Nations citizens' inherent rights are protected by their respective governments and the other governments; First Nations citizens belong to Nations and they live in communities, city hamlets, and in rural and remote regions from coast-to-coast-to-coast.
- The term **'data'** is defined in its broadest sense (i.e., First Nations data refers to all data about First Nations people at the collective and/or individual level). It is First Nations' intellectual property, historic and contemporary data, survey data, administrative data, and data from alternative sources, including data generated through research activities. It includes but is not limited to data about lands, resources and the environment — data "about us" such as demographic, socio-economic and health, housing, infrastructure, and other services, as well as data "from us" (see image on page 40 for more detail on First Nations data described as "from us") such as our languages, cultures, knowledge, and stories.
- The term **'data stewardship'** refers to core functions from data collection, access, holdings and management, to data linkages, analysis, visualization, protection, dissemination, and consumption.
- References to **"regional and national centres"** should be understood in their broadest sense. The FNIGC and its regional partners have been using the term Regional Information Governance Centres (RIGCs) for several years, and certainly since Resolution #57/2016 and reference within Budget 2018, because of the importance of that central concept — information governance — to the realization of First Nations data sovereignty. The FNIGC and its partners recognize that our concepts for these regional and national centres encompass the concepts articulated within the data strategies of various federal departments and agencies and the types of terminology used therein and elsewhere (i.e. statistical/data service centres, data hubs, shared services centres). For clarity, this report uses the terminology of regional centre(s) and national centre throughout, except where we are referring explicitly to our past use of the acronym RIGC and where we are referring to others' terminology for such statistical/data centres/hubs.



1.0 EXECUTIVE SUMMARY

PURPOSE

Like any other government, First Nation governments require timely access to quality data to plan, manage, and account for investments and outcomes associated with their citizens' well-being — they need data to provide evidence and information for decision making. Despite this, there are significant data capacity gaps that prevent many First Nations governments from effectively exercising self-determination, from achieving improved outcomes, and from serving the needs of their citizens.

In 2016, First Nations leaders from across Canada endorsed a resolution by the Chiefs in Assembly that called for funding for regional data governance champions to lead a series of engagements on the development of a national data governance strategy and the establishment of ten fully functional regional First Nations Information Governance



"There is an urgent call for decolonizing data, ensuring that First Nations are not left behind in the digital revolution — thus creating another gap."

Bonnie Healy
Health Director, Blackfoot Confederacy
FNIGC Chairperson

Centres to support First Nation governments' data-related activities. In direct response to this resolution and as a first step towards its partial implementation, Budget 2018 provided \$2.5 million over three years to support the First Nations Information Governance Centre's *"design of a national data governance strategy and coordination of efforts to establish regional data governance centres."* This funding was provided as part of the New Fiscal Relationship priority.

Given the importance of this priority and First Nations' collective state of readiness (First Nations leadership have pursued data sovereignty for years, leading up to Budget 2018), FNIGC re-profiled the funds to complete the work within two years instead of three, delivering a strategy document (i.e., this report) to the Government of Canada in the spring of 2020 rather than in 2021.

The ultimate goal with this report, and the proposals and recommendations within it, is to secure support and funding from the Government of Canada so that First Nations can begin the progressive implementation of the proposed data governance strategy (the **Strategy**) as early as fiscal 2021-2022. It is recognized that the path to data sovereignty laid out in this report is ground-breaking and a long-term undertaking — achieving the goals set out herein will require a phased-in approach, a close partnership among First Nations governments, and a collaborative working relationship with the Government of Canada along with both the provincial and territorial governments.

INTENT AND APPROACH

While the proposed strategy is fairly comprehensive and reflects substantial engagement with First Nations, it should be taken as a blueprint that will need to be further unpacked, adjusted, and refined by rights holders (First Nation governments as defined by the Nations themselves), to whom FNIGC's regional partners are accountable. As a result, this strategy is an "evergreen" document — a strategy that will inevitably evolve through implementation as more detailed planning, analyses, and collaborative work takes place at the local, regional, and national levels, as appropriate. Regional implementation plans will emerge as each region demonstrates their interest and readiness.

The FNIGC has designed this strategy based on a roadmap to implement the recommendations from the Royal Commission on Aboriginal Peoples (RCAP), the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the Truth and Reconciliation Commission's Calls to Action, and the Missing and Murdered Indigenous Women and Girls (MMIWG) Calls to Justice and builds on the clear direction from FN leadership, heard in engagements that have occurred across the country for the better part of the last 18 months. The approach taken to develop the **Strategy** also reflects on-going dialogues with key federal partners including Indigenous Services Canada and Statistics Canada (who have provided valuable insights) to ensure the **Strategy** aligns with Government of Canada priorities and policy frameworks while staying true to the spirit and intent of the roadmap that has been set.

SCOPE AND CONTENT

This report provides an overview of the key drivers for change and essential background information on FNIGC and its regional partners, and the engagement process that was undertaken to inform the **Strategy**. It articulates a **strategic framework, a vision, desired outcomes, guiding principles, and key pillars for action** for First Nations-led data governance and stewardship (Part 4). This report also presents a phased **implementation strategy** that is anchored on key success factors, as well as considerations for how success will be tracked and reported, based on a **mutual accountability framework** (Part 5). Finally, the report contains **recommendations** with short-term, concrete deliverables to prepare for launching the first phase of the **Strategy** as early as fiscal 2021-2022, thereby securing the benefits of Budget 2018 investments (Part 6). Like the *Data Strategy Roadmap of the Federal Public Service* and associated departmental data strategies, this strategy is a “comprehensive, First-Nations-driven approach” to data stewardship, covering all key functions from data collection and data holdings to data discovery, analysis, visualization, protection, dissemination, and consumption. It includes survey data and alternative data sources (e.g. administrative data) for statistical and research purposes to produce new insights and fill the data gaps.

THE STRATEGIC FRAMEWORK

The First Nations data governance strategy presented in this report is articulated around the strategic framework illustrated below. It is a framework that leverages recognized best practices.

First Nations Data Governance Strategic Framework

Our Vision: A First Nations-led, national network of modern information and statistical service centres at national and regional levels, to serve the data capacity needs of communities and Nations and to advance the realization of data sovereignty that is in alignment with First Nations' distinct worldviews.

Desired Outcomes for First Nations and Canada

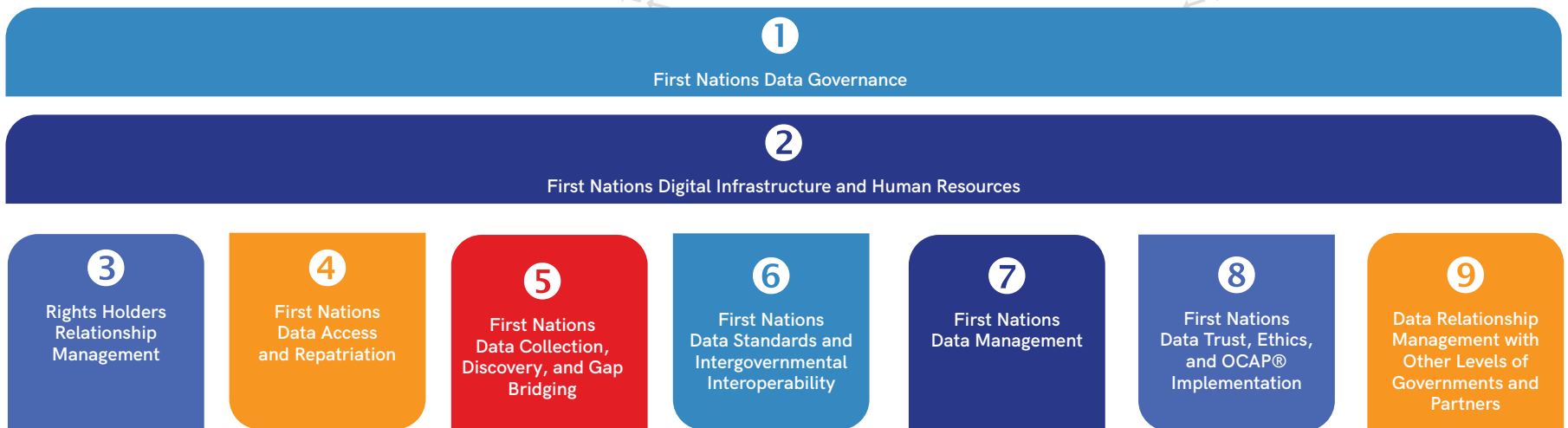
As stewards of their data:

- Rights holders are empowered by evidence-based decision-making
- Nation-driven data gaps are closed more rapidly
- Services to First Nations are improved at a faster pace
- Transfer of government services back into the hands of rights holders is enabled
- Progress toward self-determination and self-governance is fast-tracked
- Progress for a New Fiscal Relationship is further enabled, through the power of data (incl. fiscal capacities)
- First Nations wellness and quality of life improvements are accelerated
- Relevant UNDRIP, RCAP, TRC Calls to Action, and MMIWG Calls for Justice commitments are fulfilled

Our Principles



Pillars



THE VISION FOR ACHIEVING BROAD OUTCOMES

The **Strategy** is anchored in a vision that every First Nation will achieve data sovereignty in alignment with their respective distinct worldview — both as an inherent right and as a transformational requisite to further advance self-determination and self-governance, and to enable the transfer of community service delivery back to First Nations governments (as dictated by rights holders). These are fundamental prerequisites for improving services and rectifying socio-economic inequalities. To action these transformations, First Nations must first harness their information and leverage meaningful and reliable data, from all sources. To achieve the vision, the **Strategy** will hinge on the establishment of fully functional regional and national data and statistical service centres or information governance centres (the term ‘regional and national centres’ will be used interchangeably in this report for clarity purposes). More details on the key drivers and vision for change can be found in Parts 2 and 4 of this report.

THE GUILDING PRINCIPLES

The **Strategy** is based on eight guiding principles that are fundamental to its success. Thirty-three (33) different principles fall under the following eight headings: Community-driven and Nation-based (the cornerstone of the **Strategy**); OCAP®; Relationships; Transparency and Accountability; Quality Community-Driven Standards and Indicators; Nation Building; Equity and Capacity; and, Effective Technology and Policy. These principles have

been developed through national engagement; recognizing, understanding and applying them throughout the journey are essential. They are presented in detail in Part 4.3 of this report.

PILLARS FOR ACTION

To achieve the vision and intended outcomes, the **Strategy** is articulated around **nine pillars**; together, these pillars are at the heart of the proposed strategy. They are the building blocks for action and real change, and they represent priority areas of intervention (or action) where First Nations’ capacities must be built. Each pillar defines which data function and capacity should be built and why, as well as the paths that need to be taken to deliver moving forward. As illustrated in the Framework, the first two **pillars** (#1 and #2) are **horizontal** (and cross-cutting) by nature as they enable the work of all other pillars in a consistent and integrated manner, both at the regional and national levels. The other seven **vertical pillars** (#3 to #9) are specific functions (i.e. programs or services) of data stewardship for which unique competencies, expertise, and tools need to be built in order to realize direct impacts at the community or nation level.

Part 4.4 of this report presents each pillar in detail, including what it is about, what the expected outcomes are, why it is important, where we need to go, how to get there, and what is next. Below is a brief overview of what each pillar intends to achieve and the capacities that will be required.

ENABLING PILLARS (HORIZONTAL PILLARS)

Pillar #1, First Nations Data Governance

Governance is in place at the regional and national levels to: a) ensure that the **Strategy** is implemented in an effective and cohesive manner, as well as that regional centres are established, operational, performing well and they remain strategically aligned and properly integrated at the national level; b) safeguard recognition of Nations and the definition of protocols for working with them as well as the application of OCAP® principles; and, c) define the governance standards at the regional and national levels (i.e., roles, authorities, memberships, decision-making process, delegation, etc.) including codes of conduct, resource and asset management policies, transparency, accountability, protection of privacy, and relationships with partners.

Pillar #2, First Nations Digital Infrastructure and Human Resources

First Nations' knowledges and competencies and IM/IT infrastructure are in place at the national and regional levels to: a) support rights holders' data stewardship needs from data collection and acquisition, to access, storage, sharing, linkages, discovery and dissemination; and, b) ensure the data are understood, used, interpreted, managed and protected, including for privacy and confidentiality, through leading-edge centres equipped with the knowledge, skills and technology required — this includes customizable, scalable, and interoperable digital environments at the local, regional, and national levels.

DATA STEWARDSHIP PILLARS (FUNCTIONAL PILLARS)

Pillar #3, Rights Holders Relationship Management

Capacities exist at the regional and national levels to work with rights holders and First Nations organizations to: a) identify, prioritize and manage, on a periodic basis, their short-, medium- and longer- term priorities, including for data access, holdings, management, discovery, gap bridging, creation of evidence and research; and, b) ensure they have access to functional regional and national centres that will meet their needs in an effective and responsive manner. As such, this pillar drives priority setting in the other pillars.

Pillar #4, First Nations Data Access and Repatriation

Capacities exist at the regional and national levels to work with rights holders, First Nations organizations and other governments to: a) inventory and access key First Nations data holdings, assess data quality, develop catalogues, identify where gaps exist and prepare for filling those gaps; and, b) determine access and holding protocols or data repatriation agreements into First Nations' jurisdiction as chosen by rights holders — where Nations have established capacities, direct repatriation may occur; in most cases, data would be repatriated to a regional centre to steward as directed by a Nation.

Pillar #5, First Nations Data Collection, Discovery and Gap Bridging

Capacities exist at the regional and national levels so that rights holders can leverage the power of their data by: a)

creating new and enriched evidence-based information from multiple sources through data linkages (including administrative data and alternative sources), filling data gaps, and telling their own stories, reflective of their traditional knowledge, languages, and unique worldviews; and, b) having control over data collection within their jurisdiction and on research that impacts them.

Pillar #6, First Nations Data Standards and Intergovernmental Interoperability

Capacities exist at the regional and national levels to work with rights holders, First Nations organizations and federal and provincial governments to develop First Nations-defined data standards and interconnectable datasets while preserving privacy, confidentiality, and trust — this includes standards for data structures, and metadata and data quality and access; it covers standards for administrative data collection and identity management across governments. In a rapidly growing digital environment, this pillar is essential as it fosters data discovery and gap bridging (pillar 5). It is also dependent on successful data access and repatriation (pillar 4).

Pillar #7, First Nations Data Management

Capacities exist at the regional and national levels: a) to support rights holders (as directed by them) in managing their data throughout its life cycle in a reliable and secure manner; and, b) provide rights holders with user friendly access to the data they need, and in the form they need, regardless of where they are located. This pillar depends on successful data access and repatriation (pillar 4).

Pillar #8, First Nations Data Trust, Ethics, and OCAP® implementation

Capacities exist at the regional and national levels: a) to establish and uphold the highest standards for protecting individual and collective confidentiality and privacy, including languages, cultures and intellectual properties; b) implement First Nations' ethics frameworks to guide the appropriate use of data for public policies; c) implement policies and processes to ensure regional and national centres are trusted independent, apolitical and authoritative sources of quality data; and d) implement OCAP® principles with the goal to remove barriers and foster collaborations with partners for research.

Pillar #9, Data Relationship Management with Other Levels of Governments and Partners

Capacities exist at the regional and national levels: a) to establish sustainable partnerships with First Nations and other levels of governments, First Nations organizations and other partners to advance the implementation of the **Strategy**; b) participate and contribute to multi-jurisdictional data governance, advisory and expert tables or forums; c) collaborate on shared goals and priority initiatives, such as the New Fiscal Relationship, the devolution of services (as chosen by rights holders), data sharing and linkage projects, gap bridging as well as determining which level of government should be reporting on which outcomes and identifying associated indicators. Altogether, this functional pillar would help coordinate and manage the interdependencies of external partners that would exist in each of the other pillars.

STRATEGY HIGHLIGHTS

As described in detail in Part 5 of this report, the proposed implementation approach would be based on key success factors (Part 5.1), a preliminary assessment of current maturity capacities (Part 5.2), a results-based phased-in approach (Part 5.3) as well as lessons learned from the past, including the First Nations Statistical Institute (FNSI) and why FNIGC and its regional partners are best positioned to implement the **Strategy** (Part 5.4), building on existing foundations that have demonstrated their performance.

A national network of regional First Nations-led centres (data hubs)

Establishing First Nations-led data governance and stewardship capacities across Canada, covering 630+ communities and many distinct Nations from coast-to-coast-to-coast, cannot be accomplished with a centralized or top-down approach or through any one single national institution or organization. The **Strategy** is driven from the bottom-up. The only roadmap possible is a strategy capable of serving community and First Nations' data capacity needs by leveraging collaboration and partnerships at the regional and national levels, through shared service centres and data hubs, complementing efforts made to build data capacities at the local level.

Semi-autonomous and integrated regional centres

To be viable and successful over the long term, the **Strategy** must be based on semi-autonomous regional centres capable of meeting local needs and priorities of the communities and Nations they serve, while being coordinated and integrated at

the national level in order to meet common needs such as data standardization and interoperability.

An independent, legitimate, and credible network of regional and national centres

Regardless of the forms, functions, and design, including the legal foundation that such a First Nations-led data and statistical organization network may take over time, it will be essential that it is independent (expert-based and apolitical), legitimate, and credible.

A logical next step

Building on 24 years of recognized and trusted foundations, FNIGC and its regional partners coalesce to bring about the level of trust, credibility, and legitimacy that is required to make a strategy of this kind succeed. In addition to having built recognized expertise in the design, implementation, and management of national surveys, they have established a well-functioning and powerful **bottom-up network**. With representation from each region, this network engages and supports communities, and is complemented by a robust governance structure at the national level to facilitate and ensure coordination and alignment. This decentralized and bimodal tiered governance structure has demonstrated success in delivering results year after year. Its success is due in part to the purposeful design that is anchored in community-driven and Nation-based collaborative approaches. FNIGC and its partners, through their well-interconnected network of regional and local entities, is well-positioned to move forward with the proposed data governance strategy.

Leveraging FNIGC's existing capacities

In addition to a network that is rooted in community-based engagement, FNIGC and its regional partners will leverage and build upon a well-established governance mechanism, a 24 year-old mandate for First Nations surveys and statistics, an experienced team with data and survey experts that are instrumental to ensuring synergies are leveraged, and an established relationship with First Nations entities and federal departments, including Statistics Canada.

THE SHORT-TERM PRIORITIES AND RECOMMENDATIONS

Details on the short-term recommendations are presented in Part 6 of this report. They cover two priorities — both of which are vital for the future of the proposed strategy.

Priority 1 — Establishing First Nations Data Champions at the Regional and National Levels

The priority for making real progress is to establish and fund, as early as 2021-22, a dedicated data governance champion team in each region and at the national level, equipped with the minimum capacities necessary to unlock key elements of the **Strategy** with a focus on the most pressing and practical needs at each level for the next three fiscal years. ***A proposal with detailed costing and deliverables will follow over the spring and summer of 2020, provided bridge funding is released.***

Priority 2 — Securing Bridge Funding for Pre-implementation work in 2020-21

Securing funding through the federal expenditure management cycle with the goal to begin implementation in 2021-22 may take a year or more. During this time, pre-implementation work at the national and regional levels would be required to develop the necessary business cases and detailed costing. To avoid a full year of disruption and a high risk of disengagement, minimal bridge funding is required to cover these pre-implementation activities.

HOW SUCCESS WILL BE MANAGED AND ACCOUNTED FOR

Detailed, multi-year action plans will be developed for the progressive implementation of the data governance strategy by FNIGC and its partners at the national and regional levels; all plans will be articulated around the strategic outcomes of each pillar of the First Nations Data Governance Strategy Framework. Community-driven and Nation-based plans will articulate regional priorities for the data and statistical services and capacities needed by First Nations governments, within a common set of standards to ensure coherence and consistency across plans. These plans will include priorities, deliverables, timelines, and performance indicators, along with anticipated spending, human resources, and capital expenditures with a rollup at the national level. Progress on implementation will be tracked and reported on periodically throughout the fiscal-year using secured, web-based tools such as electronic dashboards with “drill-down” capabilities

for more detailed reporting. Annual reports will be developed. First Nations-led internal reviews and/or evaluations will be conducted to support continuous improvements and adjustments to the plans as required. The FNIGC's regional partners will continue to be accountable to First Nations governments as the **Strategy** unfolds — reporting responsibilities be shared with federal partners as determined by both parties based on the recognition and need for mutual accountabilities. More detail on mutual accountabilities can be found in Parts 5.5 and 5.6 of this report.

”

"Beyond self-determination and self-governance, data decolonization is equally important for First Nations addressing the gap between the life we are living today and the life Creator intended us to live."

Mindy Denny
Union of Nova Scotia Mi'kmaq
FNIGC Board member

RECOMMENDATIONS

To build a foundation, keep the momentum, and advance the **Strategy's** short-term priorities identified above, FNIGC and its regional partners are seeking, under the New Fiscal Relationship Priority and the Budget 2018 initiative, that Indigenous Services Canada:

1. **Formally endorse the *Strategy* in principle, as presented in this report, including its vision, principles, and strategic framework.**
2. **Support a phased implementation with the necessary funding, subject to the development by FNIGC and its regional partners, of the appropriate business cases with detailed costing and funding requests, and their subsequent approval by the Government of Canada, as jointly determined by both parties.**
3. **Consistent with recommendation #2, support the preparation by FNIGC and its regional partners of a detailed business case, including costing, for the establishment as early as fiscal 2021-2022 of data governance champion teams in each of 10 regions and at the national level, along with the minimum capacities they will need to be operational. Presuming support, a proposal with detailed costing and deliverables would follow over the spring and summer of 2020 for consideration by ISC.**
4. **Provide bridge funding to FNIGC totalling \$930,000 to cover pre-implementation activities (including recommendation #3) over the 2020-2021 fiscal year as detailed in Appendix VI.**