

**OFFICE OF HEAD START
TRIBAL CONSULTATION**

**July 30, 2015
Tulsa, Oklahoma**

Presented by
Dr. Blanca Enriquez, Director
Office of Head Start

Introduction

Pursuant to the U.S. Department of Health and Human Services' Tribal Consultation Policy and Section 640(1)(4) of the Improving Head Start for School Readiness Act of 2007, in 2015 the Office of Head Start (OHS) planned four Tribal Consultation sessions. The consultations were for the purpose of better meeting the needs of American Indian and Alaska Native (AIAN) children and families, taking into consideration funding allocations, distribution formulas, and other issues affecting the delivery of Head Start services in their geographic locations.

OHS is committed to consultation with Tribes through which elected officials and other authorized representatives of Tribal governments have the opportunity to provide meaningful and timely input on the development of policies or regulations, the interpretation of existing regulations, or other policies or procedures that affect Indian Tribes. OHS is committed to seeking input from AIAN governing bodies, leaders, and individuals designated by Tribal leaders and incorporating the input into its decision-making process related to matters that affect Tribes and Region XI (RXI) AIAN children and families.

The 2015 schedule follows:

March 16, 2015	Albuquerque, New Mexico
June 16, 2015	Sacramento, California
July 30, 2015	Tulsa, Oklahoma
August 17, 2015	Billings, Montana

By Notice in the *Federal Register*, dated April 7, 2015, OHS notified RXI AIAN leaders of a Tribal Consultation for Tribes in RXI on July 30, 2015, in Tulsa, Oklahoma, to be held in conjunction with the Oklahoma Indian Head Start Coalition Conference. The following report reflects comments and recommendations of RXI AIAN leaders and representatives, comments and responses from OHS, and issues raised that require additional follow-up. (There will be separate reports from each Tribal Consultation listed above.)

Participants

Office of Head Start presenters: Dr. Blanca Enriquez, Director, Office of Head Start; Captain Robert Bialas, Regional Program Manager, Region XI

Additional OHS and national contractor staff participated in person or via conference call. See the Appendix for a list of participants.

Tribal leaders and Tribal representatives: See the Appendix for a list of participants.

Introductory Remarks

Danny Wells from the Chickasaw Nation offered the invocation. Captain Robert Bialas, RXI AIAN Regional Program Manager, welcomed participants. He explained the purpose

of the consultation, expressed respect for Tribal sovereignty, and stressed that OHS would provide responses to questions during the dialogue or at a later date. He reviewed the agenda and noted these items: an update regarding OHS activities and future plans, background about RXI AIAN services, and an opportunity for Tribal leaders and others to speak. Captain Bialas introduced Dr. Enriquez, Director, OHS, and mentioned that she served successfully as a Head Start director in Texas for over 30 years. He noted that she is passionate about the success of all Head Start children.

Dr. Enriquez welcomed the Tribal leaders and representatives and stated that she felt honored to be present. She said she has enjoyed visiting the conference this week and learning about the Indian nations. She is interested in solidifying the relationship of OHS with all of the Tribal nations. At this consultation, she is summarizing services to Indian nations in 2014 and 2015.

Dr. Enriquez provided an RXI AIAN Head Start update, displaying a PowerPoint presentation titled *OHS Update Working Together*. According to the 2014 Program Information Report (PIR), services by RXI AIAN are offered to 150 Tribal grantees in 26 states. Two Tribal grantees are administered by other regional offices. Enrollment is funded for 24,405 children in the RXI service areas. This enrollment includes preschool children, infant and toddlers, and pregnant mothers. Annual funding for RXI in Fiscal Year (FY) 2015 is \$215 million, and awards span a range of grant amounts. Recently, \$14.5 million was awarded for Early Head Start-Child Care Partnerships to 14 Tribal grantees. This investment will enable those grantees to reach an additional 772 children.

Dr. Enriquez offered highlights about other areas of interest to participants:

- *Training and Technical Assistance (T/TA) Efforts for RXI AIAN*: In 2014–2015, 92 percent of the AIAN grantees received over 216 days of T/TA targeted to the following areas: program administration, ongoing monitoring, 5-year grant applications, the Classroom Assessment Scoring System (CLASS™), the parent and family engagement framework, quality improvement plans, and program design and management. Additional T/TA included 149 days devoted to training clusters, including data boot camps that stressed improving grantees' analysis, aggregation, and use of data.
- *The Health Literacy Institute*: In February 2015, OHS collaborated with the University of California at Los Angeles (UCLA) to offer this institute, which was designed to identify connections between and among family health, community involvement, school readiness, and culture.
- *New Director Training*: OHS offered training designed to support new Head Start directors; five Tribal grantees attended.
- *AIAN Facilities Report*: In compliance with the Head Start Act, OHS is preparing a report about AIAN facilities. OHS completed an assessment of over 700 AIAN grantees. Now in final preparation, the report will include the conditions of facilities, locations, ownership, photographs, and an analysis of what is needed to improve facilities. OHS wants to ensure Tribes have high-quality facilities that offer stimulating learning environments for children and that are safe.

- *AIAN Research*: Tribal grantees are involved in several research projects designed to gain a better understanding of AIAN services for the purpose of improvement and innovation. These include the Tribal Early Childhood Needs Assessment Designs Options Project, the Head Start Health Managers Descriptive Study (2011–2015), the Head Start Family and Child Experiences Survey (FACES), the Tribal Early Childhood Research Center projects, and the Summer Institute at Johns Hopkins University held in July 2015 dedicated to early childhood research and Tribal communities.
- *Tribal Consultations*: This Tulsa Tribal Consultation is one of several in 2015. One was held in Albuquerque, New Mexico, in March; another was held in Sacramento, California, in June; and one is scheduled to be held in Billings, Montana, in August. OHS may schedule a few more in 2015, in the new fiscal year.
- *Language Initiatives and Promotion*: OHS supports full integration of AIAN language and culture in Head Start and Early Head Start and Native language instruction and preservation. In March 2015, OHS issued the Information Memorandum (IM) [Native Language Preservation, Revitalization, Restoration, and Maintenance in Head Start and Early Head Start Programs \(ACF-IM-HS-15-02\)](#). This IM addresses language issues repeatedly raised by Tribal leaders at Tribal Consultations and reinforces OHS support for Native language programs. OHS also offers a helpful tool, *Making it Work!* This is a planning process that supports AIAN Head Start programs interested in teaching their language and culture while meeting Head Start requirements.
- *Status of the Designation Renewal System (DRS) and AIAN Programs*:
 - In 2014, 118 programs were reviewed. Eighty-two (approximately 69 percent) were in full compliance and eligible for a 5-year grant. Twenty programs (about 17 percent) had areas of noncompliance, and all were corrected in the time allocated. Sixteen (about 14 percent) had deficiencies and created Plans to Improve Quality (PIQs) to prepare for reevaluation. The major areas of noncompliance were the code of conduct, governing body responsibilities, and determining the health status of children. All problems were corrected.
 - In 2015, DRS data indicate areas of improvement over 2014. In that year, 33 Tribal grantees were reviewed. Nineteen (about 58 percent) were in full compliance and granted 5-year grants. Eleven (approximately 33 percent) had one to five areas of noncompliance. Only three (about 9 percent) had deficiencies, and they were provided with the opportunity to correct them. The major areas of noncompliance were child supervision, health and safety of facilities, and criminal background checks.

Dr. Enriquez thanked the Tribes for the opportunity to report on Head Start and Early Head Start (EHS) services and to convey OHS's commitment to Tribal governments. At OHS, the leadership is deeply respectful and appreciative of the relationships with Tribes and wants to build those relationships.

Captain Bialas asked the Tribal representatives to introduce themselves and then expanded on the report offered by Dr. Enriquez.

He explained that the grantees span a vast territory in 26 states and include 150 programs. Enrollment is funded for over 24,000 children and families in the RXI service areas. He added that the AIAN team is expansive and includes and depends for success on Tribal leaders. Captain Bialas made remarks about the following topic areas:

- *RXI AIAN Team:* The team working on issues affecting RXI AIAN includes Tribal elders, Head Start programs, program specialists, National Centers, Tribal organizations, Danya, and other collaborators. He noted the importance of Danya's efforts to conduct monitoring and stated that the Tribes should reach out to him if they have concerns during a review.
- *DRS:* Captain Bialas discussed DRS as it affects RXI AIAN programs. He noted that DRS in RXI differs from the other Regions (Regions I–X and Region XII). When there are findings in other Regions, the programs go directly into recompetition. In RXI, OHS can work with Tribal leaders and T/TA staff and programs to develop a PIQ, arrange site visits, conduct one-on-one consultations, and provide T/TA to assist Tribes. In the first 6 months of a consultation when the PIQ is developed, T/TA is offered immediately to programs. This process has led to many performance improvements throughout the country. After 6 months, the Tribe and OHS sign the PIQ, and OHS offers 6 more months of T/TA. On average, there are 8–10 months of T/TA. At the end of the year, there is a reevaluation. There is a special monitoring protocol for these reevaluations. (During Cohort 2, reevaluations were reconsidered to ensure the process was working. At that point, OHS decided to look only at the deficiency on record during the reevaluation. If CLASS led to DRS, the reevaluation only looked at thresholds. To date, all reevaluations scheduled following completion of the PIQ have been successful.) To date, no programs have had to be discontinued or to recompete for funding as the result of DRS. During reevaluations of programs with low CLASS scores, CLASS scores rose. In Cohort 4, programs are moving forward; some programs in that cohort have requested immediate reevaluation.
- *CLASS:* Captain Bialas shared RXI AIAN CLASS scores. In 2012, RXI had the lowest scores in the country. He has ensured T/TA availability to improve scores, and they have improved. Instructional Support (IS) is challenging but, in 2015, the IS scores rose. In fact, all RXI scores for CLASS have improved. In FY2015, the RXI average Emotional Support score was 6.1. Classroom Organization scores were over 6.05. IS scores averaged 2.7. There has been major improvement in the Region, and two RXI programs had perfect scores of 7.0.
- *Communications:* Captain Bialas encourages strong communication and has an open-door policy. He believes in regular dissemination of information. Program specialists have visited on site, and he supports making annual site visits; OHS keeps in regular communication with programs; response time to Tribal queries has improved; and Captain Bialas has regular calls with AIAN organizations and consortia, including the Northwest Indian Head Start Coalition and the Alaska Head Start Directors. He also has monthly calls with many Tribal organizations.
- *T/TA:* FHI 360 made over 5,600 site visits during their T/TA contract. Now there is a new contract with ICF International. Captain Bialas has been meeting with Rhonda Kindred, T/TA Coordinator for ICF. She is present at this Tribal Consultation and will

be attending the consultation in Billings, Montana, in August. ICF is interviewing and assembling a team. There will be an announcement when the team is organized. Ms. Kindred has worked with AIAN programs in the past and will work closely with OHS and the Tribes.

- *Data Boot Camps:* The boot camps were well received throughout the country. There is agreement that it is important to continue the boot camps. Jarma Wrighten, National Center for Quality Teaching and Learning Regional Field Specialist, RXI AIAN, worked on this project and on school readiness. Dr. Enriquez said OHS will continue to ensure that programs receive training about the use of data.
- *Health Literacy Institute:* This institute held by UCLA taught parents how to improve children's health. It was held for 2½ days in Washington, DC, and 27 grantees attended with staff members. Program specialists, grantee specialists, and directors also attended. Following the meeting, there has been continuous follow-up by UCLA to educate first time parents who attended by sending them materials about health. This institute offered great follow-up to parents who benefitted from instruction. It was a powerful experience, and UCLA will continue to assist OHS in the future.
- *FACES:* This has been an excellent collaboration between Tribal leaders, OHS, and Head Start directors. When the project was initiated, Captain Bialas stressed to the Office of Planning, Research and Evaluation (OPRE) the importance of involving Tribal leadership. As a result, there are weekly calls between Tribal directors and the FACES group to plan and discuss the survey.
- *Head Start Health Managers Descriptive Study:* This study of the characteristics of AIAN health managers, their priorities, and support for health services has been completed. OPRE has submitted the information to the institutional review boards for Tribes throughout the country. The results will be disseminated in 2015 when the review is completed.
- *Facilities Report:* OHS has looked at 82 percent of the centers. The report will be approved by OHS leadership and the Administration for Children and Families (ACF). The intent is to identify challenges within RXI AIAN. The data will be shared with Congress and will show facility needs across the country. Tribal leaders will have the opportunity to see the report. All centers in Oklahoma were reviewed.
- *New Funding Opportunity:* At the end of this year, there will be a \$5 million Funding Opportunity Announcement (FOA) for expansion of birth-to-5 programs. Grantees will only be able to use these dollars for expansion, not for quality improvement.
- *Head Start Program Performance Standards:* The proposed Standards were released as a Notice of Proposed Rulemaking on June 19, 2015. The Oklahoma Head Start Association has organized a meeting in Norman to talk about the standards during the first week in August 2015. This meeting will offer the opportunity to discuss the standards and prepare questions, comments, and recommendations.

Captain Bialas stated that he is proud of his staff and the T/TA that OHS offers to AIAN programs. He recognizes there are improvements to make and consistently makes changes to improve services based on Tribes' suggestions. He also encourages follow-up on issues raised by the Tribes, takes steps to address their concerns, and is dedicated to serving the Tribal nations.

Comments of RXI AIAN Participants and OHS Responses

A. Facilities—RXI AIAN Participant Comments

- *Alva Dee Tsoodle, Kiowa Tribe:* There was severe rain in Oklahoma in June 2015 following a serious drought. Two Head Start programs were affected by leaks, including one Head Start program in the Apache Reservation area and one in the Carnegie area. It is critical to get funding to repair and replace Tribal buildings affected by this emergency. The main office building was damaged by rain and wind. Mold is another problem affecting these facilities previously. The Tribe needs to resolve these issues by the time school starts. They do not have the funding in their budget that they need to take care of all of this damage.
- *Jeannie Toppah, Kiowa Tribe:* Their Tribe previously applied for one-time funding to resolve mold issues, but the mold was not at their major location. The state shut down the facility.
- *Alva Dee Tsoodle, Kiowa Tribe:* Should they apply for one-time funding a second time, because the additional damage beyond the original mold problem was unforeseen?
- A participant recalled that their Tribe had a problem 3 years ago due to leakage and mold. OHS offered one-time funding and resolved the issues. The Tribe was happy to receive funds and noted that OHS offers valuable help in these circumstances.

Facilities—OHS Responses

- Captain Bialas suggested applying for one-time funding if the facilities can be repaired. OHS will examine funding applications and make a determination about whether funds can be made available to assist with repairs. Last year, OHS issued \$2–3 million in one-time funds.
- Dr. Enriquez said that the Regional Office could help the Tribe submit a request for one-time funding.
- Captain Bialas suggested that the Tribe discuss this situation, including the past request for funds, with Tracie Little, Program Specialist.
- Dr. Enriquez noted that there have been two occurrences, and that the second need is critical, as they cannot serve their children. In emergencies, Tribes should ask OHS for assistance. She added that insurance may cover some damage.

B. Funded Enrollment—RXI AIAN Participant Comments

- *Stuart Redwing, Santee Sioux Nation:* There is a concern about classroom enrollment. The Tribe is struggling to keep up and faces problems when parents move or children leave to move in with grandparents.
- *Joyce Thomas, Santee Sioux Nation:* Because preschool state-funded programs are attracting families, the Tribe struggles to keep up enrollment. Nebraska has kindergarten entrance on October 15. In Nebraska, every school district has an assessment. If children pass, they are admitted to kindergarten. One preschool in Santee accepted all children if they did not pass the assessment. The Tribe asked

OHS if the Tribe could enroll children on October 15 as the public school does, but did not receive an answer. The Tribal Council approved the date, so the Tribe operated that way last year. This year there is a new school board working with the Tribe, and the board agreed to serve Tribal preschool children after school only. The Tribe wants assurance that the enrollment date of October 15 is legal.

Funded Enrollment—OHS Responses

- Dr. Enriquez believes the plan for a later date for enrollment is legal and will verify this fact.
- Captain Bialas advised working with a program specialist to see if the Tribe can achieve full enrollment when there are questions. If the grantee discovers that pre-kindergarten is absorbing children, it can consider requesting a reduction in funded enrollment. It is important to be proactive to avoid a later finding that reduces the base amount of funding. Also, if a pre-kindergarten is absorbing the preschool children, the program can consider converting slots from Head Start to EHS if there is a need for EHS.

C. T/TA Contract—RXI AIAN Participant Comments

- *Danny Wells, Chickasaw Nation:* ICF previously lost the T/TA contract. He requested comments about why this contractor was awarded the T/TA contract this year. The Tribes need quality T/TA, and FHI 360 met its obligations.

T/TA Contract—OHS Responses

- Captain Bialas said that a panel reviews proposals before the Program Support Center (PSC), which is hosted by the U.S. Department of Health and Human Services, examines the bids. PSC reviews notes and makes an award based on the content of the proposal and the budget. He said that he was not on the panel and does not know how many applications were submitted, but that he can look into this issue. OHS is off to a good start with ICF.
- Captain Bialas said he would help guide T/TA. Ms. Rhonda Kindred at ICF is studying the PIQs and information on pre-service requests, and she is well aware of the need for commitment by the T/TA team. All service providers will receive training in August before providing T/TA in the field. After training, in the week starting on August 17, the team will go into the field.

D. Teacher Qualifications and Compensation—RXI AIAN Participant Comments

- *Danny Wells, Chickasaw Nation:* The Tribes need more funding to retain teachers. There is a teacher shortage for this Nation and a huge decline in people interested in teaching. The likelihood of finding qualified people who meet the requirements is slim. The shortage has grown from 500 teachers in March to 1,000 at the present. The Tribes need guidance about how to fulfill the qualification requirements. Mr. Wells asked if waivers would continue to be granted under the new regulations.
- Another participant discussed collaboration with the Choctaw Nation on salaries starting at \$38,750 for teachers. The Native American Institute is educating 11 teachers who will come to the Choctaw Head Start programs for training. Later,

Choctaw plans to hire them as certified teachers. Other Tribes might be able to collaborate with the Institute.

- *Danny Wells*: The Chickasaw Nation is trying to develop their own teachers and is having discussions with 8–10 colleges in Oklahoma. He stated he is in favor of staff attaining associate of arts (A.A.) degrees or bachelor of arts (B.A.) degrees, but this takes time. He is not in favor of staff attaining a Child Development Associate Credential™ if they can work towards A.A. or B.A. degrees. The Tribe will comment on the proposed rules. He does not want to be considered out of compliance if they have no teachers to hire.
- *Mike Williamson, Otoe-Missouria Tribe*: It is best for staff to strive for the A.A. or B.A. degree.

Teacher Qualifications—OHS Responses

- Dr. Enriquez recalled that it was difficult to find EHS teachers who met the qualifications when she was a director. She encouraged meeting attendees to discuss this matter with the Regional Office, Captain Bialas, and the program specialist to determine if OHS can help them find solutions to their unique problems, including waivers. She also noted that when other Tribes offer suggestions, these ideas may lead to solutions.
- Ms. Little noted that OHS is approving Head Start teacher waivers and that information about this has recently been sent to all directors. The program director must submit a waiver request, and OHS will then assess the program's teacher credentials. They are not approving EHS teacher waivers.
- Captain Bialas noted that these waivers are being offered under the Program Performance Standards currently in effect. He is not sure they will be offered under the new proposed Standards. An approved waiver of teacher qualifications is offered for 3 years. Some now in existence are coming to an end. The program specialists are examining those waivers to determine if teachers have been hired. The specialists will discuss the status with programs. He encouraged participants to comment on the proposed rules. Captain Bialas said he does agree that building from within is the best strategy. New teachers should be enrolled in school and have a professional development plan.
- Dr. Enriquez asked for comments on whether it is too difficult for Tribal programs to obtain waivers. She asked the programs to offer solutions in comments, such as more leniency on waivers.

E. CLASS and DRS—RXI AIAN Participant Comments

- *Danny Wells, Chickasaw Nation*: He plans to submit comments regarding DRS. Initially, the Tribes were guaranteed that CLASS would not be used during monitoring reviews. In spite of this assertion, CLASS became part of federal reviews; the outcome was that some programs were placed into DRS. CLASS was designed as a teacher observation tool and has been used beyond its intent. It does help teachers improve performance. It is important to take a serious look at the long-term effects of using CLASS as a review tool. He also is concerned about the 10 percent standard. It was originally proposed as 25 percent and later revised to 10

percent. He plans to comment that this is a poorly designed plan and guarantees failure by 10 percent of programs. Programs can succeed during a review and later receive a letter that they are in DRS due to the 10 percent standard. This is hard to explain to Tribal leadership. This negative approach is not an effective way to work. Instead, OHS should offer awards and incentives to high-performing programs to encourage success.

- *Katy Pruitt, Choctaw Nation*: CLASS is culturally biased, and there should be a tool that does not have this bias.
- *Joyce Thomas, Santee Sioux Nation*: OHS should ask CLASS reviewers to come on site before the review to meet with staff and obtain a better understanding of the Tribe and program.

CLASS and Designation Renewal System—OHS Responses

- Dr. Enriquez responded that she is listening and will be looking at this issue.
- Captain Bialas said it is difficult to make calls to programs that are above the thresholds but in the lowest 10 percent, especially when the programs are barely below the 10 percent limit.
- Captain Bialas said there is research at Michigan State University on whether CLASS is culturally biased. He noted that reviewers who do not speak the Native language cannot conduct CLASS observations. He added that CLASS reviewers are expected to conduct CLASS observations without discussing findings.

F. Monitoring—RXI AIAN Participant Comments

- *Colette Berg, Cheyenne and Arapaho Tribes*: During monitoring reviews, there is no dialogue or communication. In the past, corrections could be made on site after health and safety checks, and there was dialogue. Why and when did that process change? She discussed concerns about an area of noncompliance and contacting a supervisor of the person who conducted the review. She would prefer to talk to the reviewer to offer information. Dialogue is helpful to explain Native situations to non-Native reviewers.

Monitoring—OHS Responses

- Captain Bialas noted that in the past there were debriefings and discussions. There is a new, aligned monitoring system designed to look at the whole picture. He plans to discuss onsite communication and follow up on Ms. Berg's concerns, though he realizes that the new monitoring system is structured differently.
- Dr. Enriquez said that the 5-year grant determined the design of the new monitoring system. The monitoring plan will change again when the new Program Performance Standards are finalized. The content of monitoring reviews will reflect the new Standards. She asked participants to comment on this issue.
- Captain Bialas noted that he sees every monitoring report and calls the program if there are specific questions. Often he sees the report three times before it is signed for quality assurance.

G. Budget Issues—RXI AIAN Participant Comments

- *Danny Wells, Chickasaw Nation*: The proposed rules stipulate doing away with part-day programs and extending days. Will there be increased funding to support these changes? Teachers and teacher assistants cannot be expected to do this within existing funds, because they will be working overtime every day. The Tribes are in this together with OHS and rely on OHS support. The change will be difficult to manage.
- *Mike Williamson, Otoe-Missouria Tribe* reiterated comments by Danny Wells.
- A participant asked if funding is based on passage of the Administration's budget. If the budget does not pass, will Head Start continue to use the current Head Start Program Performance Standards?
- *Katy Pruitt, Choctaw Nation*, stated that in public schools in Oklahoma, students attend for 182 days per academic year. This number includes parent-teacher conference days and teacher training days. With a Head Start standard of 180 days of child attendance, in Oklahoma Head Start would have an attendance requirement longer than the public schools.

Budget Issues—OHS Responses

- Dr. Enriquez said OHS has asked for funding to implement these provisions. The funding does depend on passage of the Administration's budget. OHS will have to determine how best to implement the full-day/full-year requirement if the budget does not pass. Some programs are far ahead, but many still offer a half-day for preschool children. The impact of lack of funding for this provision will vary from program to program. OHS will assess this situation. Until the regulations are final, OHS will not know how best to proceed. Research indicates that increasing attendance is better for children. In addition, OHS will consider which locally designed options will work for programs and will offer waivers to accommodate local programs. OHS leadership is committed to helping programs succeed.
- Dr. Enriquez encouraged comments on the proposed rules about counting training and parent-teacher conference days toward the required number of attendance days.

H. Miscellaneous—RXI AIAN Participant Comments

- *Oklahoma Background Checks*: One participant noted that during the last Tribal Consultation in Tulsa, Tribal representatives discussed concerns about background checks and fingerprinting in Oklahoma. This year the Oklahoma state licensing department is handling these issues better.
- *Culturally Sensitive Review Team Members: Verna Thompson, Cherokee Nation*: How is OHS recruiting culturally sensitive Native American team members for review teams? Have more been recruited?

Miscellaneous—OHS Response

- *Background Checks*: Captain Bialas said that although he had called the state about these problems, no one would discuss the matter with him or respond to his inquiries. He is happy things have improved and hopes his calls initiated some action.

- *Culturally Sensitive Review Team Members*: Captain Bialas said the number of culturally sensitive team members remains low for both Danya and CLASS reviewers in spite of recruitment efforts. Retired directors are eligible to apply. Recruiting has been a struggle. The Danya website posts the application and interested program staff can complete it online: <https://headstartrecruiting.silkroad.com>.

Conclusion

Captain Bialas thanked everyone for their comments and questions. OHS will follow up on concerns raised at the consultation. He reminded participants about the Oklahoma Head Start Association meeting in Norman in August on the subject of the proposed Head Start Program Performance Standards. Dr. Enriquez reiterated she is appreciative and humbled by the invitation to the consultation. She said she enjoyed getting to know the participants. She wants to strengthen the OHS relationship with AIAN programs. Danny Wells closed the consultation with a prayer.

Summary of Requests, Recommendations, and Action Steps

Following is a summary of requests and recommendations from AIAN participants, OHS responses to questions, and action steps resulting from the Tribal Consultation discussion.

RXI AIAN Participant Recommendations/Questions

Facilities

- *Kiowa Tribe* asked if an application for one-time funds for rain damage was appropriate if another application was submitted previously for mold damage.

Funded Enrollment

- *Santee Sioux Nation* asked if establishing Head Start enrollment for October 15 is in compliance with Head Start regulations.

T/TA

- Chickasaw Nation asked why ICF International was awarded the T/TA contract.

Teacher Qualifications and Compensation

- *Chickasaw Nation* noted that the Tribes need more funding to retain teachers. There is a teacher shortage and a huge decline of people interested in teaching. The Tribes need guidance about how to reach the requirements for certification. Will waivers continue to be granted under the new regulations?

CLASS and DRS

- *Chickasaw Nation* suggested that OHS consider the long-term effects of using CLASS as a review tool. The Tribe believes that using the 10 percent standard for DRS is a poorly designed plan that guarantees failure by 10 percent of programs.
- *Choctaw Nation* asked for a culturally appropriate assessment for Tribes.
- *Santee Sioux Nation* suggested that OHS ask CLASS reviewers to come on site before a review to obtain a better understanding of the Tribe and program.

Monitoring

- *Cheyenne and Arapaho Tribes*: When did the process change for making corrections on site during monitoring reviews?

Budget Issues

- *Chickasaw Nation* and *Otoe-Missouria Tribe* asked if there will be increased funding to support changes of Head Start programs to full-day/full-year programs.
- A participant asked if increased funding to meet the new requirements requires passage of the Administration's budget. Will the current Program Performance Standards remain in effect if the budget does not pass?
- *Choctaw Nation* noted that public schools in Oklahoma require students to attend for 182 days, and the days include parent-teacher conference days and teacher training days. Head Start proposes 180 days of attendance. This is an attendance requirement longer than the public schools in Oklahoma. Would Head Start consider counting teacher training and conference days to fulfill attendance days?

Miscellaneous

- *Culturally Sensitive Review Team Members: Cherokee Nation* asked how OHS is recruiting culturally sensitive Native American team members for review teams and if the number of these reviewers has gone up.

OHS Responses and Action Steps

Facilities

- Dr. Enriquez said that the Regional Office could help the Tribe submit a request for one-time funding because children cannot be served.
- Captain Bialas advised discussing specific needs with the Program Specialist.

Funded Enrollment

- Dr. Enriquez will check on the legality of the October 15 enrollment date.

T/TA

- Captain Bialas will look into the T/TA contract award and provide information.

Teacher Qualifications and Compensation

- Dr. Enriquez asked the Tribes to discuss meeting teacher qualifications with the Regional Office, Captain Bialas, and the program specialists to determine if OHS can help them come up with solutions that solve their unique problems, including waivers.
- Ms. Little noted that OHS is approving Head Start teacher waivers and that information about this has recently been sent to all directors. The program director must submit a waiver request, and OHS will then assess the program's teacher credentials. OHS is not approving EHS teacher waivers.

- Captain Bialas said that waivers are being offered under the Program Performance Standards currently in effect. He is not sure they will be offered under the new proposed Standards. He encouraged participants to comment on the proposed rules.
- Dr. Enriquez suggested that Tribes submit comments on whether it is difficult for Tribal programs to obtain waivers and offer specific solutions in the comments.

CLASS and DRS

- Dr. Enriquez responded that she is listening and will be looking at this issue.
- Captain Bialas said there is current research at Michigan State investigating whether CLASS is culturally biased. He noted that if reviewers do not speak the Native language, they cannot conduct CLASS observations.
- Captain Bialas said CLASS reviewers are expected to conduct CLASS observations without discussing findings.

Monitoring

- Captain Bialas and Dr. Enriquez said there is a new, aligned monitoring system. The monitoring plan will change when the new Program Performance Standards are finalized because the content of monitoring reviews will reflect the new Standards. Dr. Enriquez asked participants to comment about the system and their interest in discussions on site.

Budget Issues

- Dr. Enriquez affirmed that the funding depends on the passage of the Administration's budget. OHS will have to determine how best to implement full-day/full-year requirements if the budget does not pass. The impact of lack of funding for this provision will vary from program to program. OHS will assess this situation. In addition, OHS will consider which locally designed options will work for programs and will offer waivers to accommodate local programs.
- Dr. Enriquez encouraged comments on the proposed rules about counting training and parent-teacher conference days toward the required attendance days.

Miscellaneous

- *Culturally Sensitive Review Team Members*: Captain Bialas said the number of culturally sensitive team members remains low. The Danya website posts the application and interested program staff can complete it online: <https://headstartrecruiting.silkroad.com>.

Tribal Consultation Participants

Federal Staff and Contractors

Last Name	First Name	Position	Organization
Bialas	Robert	Regional Program Manager, Region XI (RXI)	Office of Head Start (OHS)
Carter	Charlotte	Public Policy Specialist	
Enriquez	Blanca	Director	OHS
Kindred	Rhonda	Training and Technical Assistance Coordinator	ICF International
Little	Tracie	Program Specialist, RXI	OHS

RXI AIAN Tribal Leaders and Representatives

Last Name	First Name	Title	Organization
Berg	Colette	Head Start Director	Cheyenne and Arapaho Tribes
Littledave	Barbara	Senior Program Specialist, Early Childhood Unit	Cherokee Nation
Moore	Gaye	Head Start Director	Caddo Nation
Munroe	Ashton	Teacher	Otoe-Missouria Tribe
Pickens	Robert	Head Start Director	Chickasaw Nation
Pruitt	Katy	Head Start Director	Choctaw Nation of Oklahoma
Redwing	Stuart	Northeast Tribal Council	Santee Sioux Nation
Swope	Jennifer	Head Start Education Coordinator	Otoe-Missouria Tribe
Thomas	Joyce	Head Start Director	Santee Sioux Nation
Thompson	Verna	Director, Early Childhood Unit	Cherokee Nation
Toppah	Jeannie	Head Start Director	Kiowa Tribe
Trudell	Roger	Tribal Chairman	Santee Sioux Nation
Tsoodle	Alva Dee	Business Committee	Kiowa Tribe

Last Name	First Name	Title	Organization
Wells	Danny	Executive Officer, Division of Education	Chickasaw Nation
Williamson	Mike	Head Start Director	Otoe-Missouria Tribe