

**OFFICE OF HEAD START
TRIBAL CONSULTATION**

**October 13, 2015
Anchorage, Alaska**

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(l) (4) of the Improving Head Start for School Readiness Act of 2007, in 2015, the Office of Head Start (OHS) planned six Tribal Consultation sessions. The sessions 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
October 13, 2015	Anchorage, Alaska
October 28, 2015	Choctaw, Mississippi

By Notice in the *Federal Register* dated September 23, 2015 OHS notified RXI AIAN leaders of a Tribal Consultation for Tribes in RXI to be held October 13, 2015, in Anchorage, Alaska. The following report reflects comments and recommendations of RXI AIAN leaders and representatives, comments and responses from OHS, and the issues raised that require additional follow-up. (There are separate reports for each Tribal Consultation listed above.)

Participants

OHS presenters: Dr. Blanca Enriquez, Director, OHS; Frances Majestic, Acting Regional Program Manager, Region XI, and Director, Program Operations Division, OHS

Additional OHS and national contractor staff participated in person. See Appendix B for a list of participants.

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

Introduction

Mr. Mark Wasierski, Program Coordinator for the Aleutian Pribilof Islands Association, Inc. (APIA), welcomed participants. Ms. Mary Ellen Fritz, Director, Chugachmiut and representative of Tribes of Cook Inlet, offered the opening prayer.

Ms. Tara Bourdukofsky, the Education and Workforce Director of APIA, also welcomed participants. She spoke on behalf of Mr. Dimitri Philemonof, the President and CEO of APIA, who was unable to attend. She thanked the visitors for their commitment to Head Start. She noted that APIA is restructuring to provide a greater focus on education and the workforce. Their goal is to develop an Aleutians-to-Arctic workforce plan aligned with a strategic plan to expand services. They plan to tap their elders to offer cultural knowledge and also plan to share the results of hard science. They have been studying these issues for years and anticipate executing a plan by using Child Care and Development Fund dollars. The Alaska Federation of Natives Convention is meeting this week, and Ms. Bourdukofsky recommended attending events at the Dena'ina Center in Anchorage.

Dr. Blanca Enriquez, Director, Office of Head Start, thanked everyone for attending and expressed her happiness about visiting Alaska. She said it is an honor to attend the consultation and noted that the group had come together to discuss ways to better meet the needs of children, talk about the distribution of funding, and address other issues specific to this location. This is her first trip to Alaska, and she marvels at its beauty and history. She enjoyed her visit to Cook Inlet Head Start Center's high-quality program. She also mentioned her respect for the nation-to-nation relationship and welcomed working with the participants in unity to form a vision for children. OHS now serves 1,600 grantees funded in the United States and works with them to explore possibilities for improving services. Dr. Enriquez mentioned that Captain Bialas is now serving as Regional Program Manager (RPM) in Region IV, and Ms. Frances Majestic is Acting RPM for RXI AIAN.

Ms. Frances Majestic, Director of the OHS Program Operations Division as well as Acting RPM for RXI, welcomed participants and mentioned her own history with Head Start. She added that she is committed to hearing about pressing issues and planning a way forward. She also noted that there are handouts available at the meeting as resources.

Ms. Majestic reported that RXI serves 150 nations spanning 26 states. RXI enrollment is funded for approximately 24,000 children and families. There are 150 Head Start grantees, consisting of 147 Head Start programs, and 3 standalone Early Head Start programs. The current budget for RXI AIAN services is \$225 million. Including expansion and partnership grants, the budget increases to \$240 million. OHS is interested in actual enrollment figures and will be inquiring about the Tribes' challenges in reaching their funded enrollment.

Ms. Majestic addressed the following topics:

- *RXI AIAN Team*: The team is broad and depends for success on the Tribal leaders. The other team members are Head Start programs, program specialists, National Centers, training and technical assistance (T/TA) providers, Tribal organizations, Danya, and other collaborators.

- *Designation Renewal System (DRS)*: Ms. Majestic talked about the history of DRS and that the U.S. Congress eliminated indefinite project periods through legislative action. Congress also expressed the need for indicators of quality. OHS determined there would be seven indicators. Grantees in Regions I through X that meet one or more indicators are placed into competition. In RXI, grantees are notified there will be government-to-government consultations about DRS findings. The DRS is now entering its fifth year, and there are success stories; the RXI consultations have been beneficial and supported by the T/TA system and the resources brought to bear by grantees. Ms. Majestic summarized the Cohort I–IV findings, noting that Cohort IV is still in process.
- *Classroom Assessment Scoring System (CLASS™)*: Ms. Majestic provided preliminary data for Fiscal Year (FY) 2015, noting that there has been improvement in all three broad CLASS categories.
- *Communications*: In the last few years, OHS has concentrated on better dissemination of information. As the new National Centers are organized, OHS will make it a priority to ensure that more lines are open for webinar registration to greatly increase webinar attendance capacity. There are regular calls between Tribes and the Head Start staff, site visits, and calls between OHS and Tribal organizations. She asked for thoughts by attendees about the call schedule.
- *T/TA for Tribes*: ICF International has been awarded the contract to provide T/TA for RXI AIAN. Ms. Rhonda Kindred is the T/TA Coordinator for ICF, and the transition has been impressive. Stability is an important piece of the new T/TA system. Ms. Majestic noted that FHI 360 made over 5,600 site visits during the final 3 years of their 5-year T/TA contract.
- *Data Boot Camps*: Ms. Jarma WRIGHTEN, who was the Center for Quality Teaching and Learning Field Specialist arranging boot camps, is now a RXI Program Specialist. She is committed to continuing boot camps. There were six scheduled for 2015.
- *T/TA and the New National Centers*: The new centers managed and funded jointly by OHS and the Office of Child Care include the following for expectant families and children birth to 5—Early Head Start (EHS)/Child Care Partnerships; Parent, Family and Community Engagement; Early Childhood Development, Teaching and Learning; Early Childhood Health and Wellness (with the Health Resources and Services Administration); and Early Childhood Quality Assurance. OHS will manage Head Start Program Management and Fiscal Operations as the sole funder. These National Centers will share materials and training from the past centers and develop new materials. The goal is to present materials in a coordinated fashion. Head Start’s investment has not decreased. There is a graphic on the new T/TA system at this address: <http://www.acf.hhs.gov/programs/ece/interagency-projects/ece-technical-assistance>. The Office of Child Care will manage three additional centers targeted to children birth to 13. One is targeted to Tribal childcare implementation and innovation. The bottom section of the graphic displays available resources for the T/TA system.
- *Health Literacy Institute*: This project was operated through a National Center and offered to 27 grantees. Costs were covered, including some travel and a package of materials. This institute was conducted by the University of California at Los Angeles and taught families how to improve children’s health. It was held for 2½ days in Washington, DC. Staff from the 27 grantees will become trainers in their local

programs. Program specialists and grantee specialists also attended. Professionals were available to train the trainers on how to use materials. It was a great opportunity, and staff and families also are benefitting from ongoing training post-institute for up to 1 year.

- *AIAN Head Start Family and Child Experiences Survey (FACES)*: For many years RXI was not included in FACES. To remedy this, OHS sent staff to meetings held by the Office of Planning, Research and Evaluation, which oversees the study, to determine how best to include AIAN. As a result, a workgroup was established, and weekly calls have been held with AIAN Tribal leaders to enable them to contribute to the design for AIAN FACES data collection. Data are scheduled to be collected this fall. Data collection will repeat in spring 2016 and 2017. A total of 22 RXI programs are included.
- *Head Start Health Managers Descriptive Study*: The survey covers the characteristics of health managers, their priorities, and support for health services. Ms. Majestic noted that the study will enable OHS to look at the current landscape of health services and how they are sustained, how to staff services, and how to collaborate. An expert workgroup has met three times to consider the report, which may be disseminated this winter.
- *Facilities Report*: OHS has had the opportunity to view a high percentage of centers. At completion of the survey, 100 percent of grantees will have had some or all centers assessed. Data analysis is under way. The report will be approved by OHS leadership and the Administration for Children and Families (ACF). It will contain the location, ownership, and condition of centers visited in accordance with the requirements of the Head Start Act, OHS, and ACF. Ms. Majestic said OHS is developing a database, and the last pieces are arriving. OHS is quantifying the hard data and may do a cost projection for the report.
- *FY 2016 Budget*: There is a continuing resolution in place. Grantees with funding in October, November, and December of 2015 and January of 2016 are funded at 50 percent of their allotment, including technical assistance. Ms. Majestic noted that, unlike many other programs, sequestration funds came back to Head Start. It was the only program, other than projects at the Department of Defense that had funding restored. It is clear that the Head Start community influenced this action, because many members of Congress consider early childhood vital to the country's future. There is a version of the budget that shows a small increase for partnership/expansion, but it is unclear at this point how and if that legislation will move forward.
- *Head Start Program Performance Standards Notice of Proposed Rulemaking* (<https://www.federalregister.gov/articles/2015/06/19/2015-14379/head-start-performance-standards>): There were 300 unique comments submitted in response to the Notice of Proposed Rulemaking (NPRM); the comments were signed by over 1,000 people. OHS is working diligently on an analysis of comments and moving quickly to produce a thorough analysis.
- *Head Start Early Learning Outcomes Framework*: This document covers birth to 5. There is an interactive online version. (<http://eclkc.ohs.acf.hhs.gov/hslc/hs/sr/approach/cdelf>) as well. The U.S. Government Printing Office printed 3,000 copies for distribution, and grantees will each receive a copy in the near future.

- *Tribal Early Learning Initiative (TELI)*: There is a webinar occurring the week of this consultation concerning four small grant pilot projects across the country that are funded for the purpose of coordinating local resources. ACF works closely with the TELI Tribes to identify obstacles to collaboration and systems improvement, and to help them address these obstacles in ways that are in line with Tribal community values, traditions, and priorities. ACF recently announced \$600,000 in awards to a new cohort of TELI grantees to enable more Tribal communities to innovate coordination of early learning and development programs. For more information about TELI, refer to <http://www.acf.hhs.gov/programs/ecd/tribal-early-learning-initiative>.
- *AIAN Collaboration Office*: There is a new 5-year grant, and there are new collaboration priorities. Mr. Micker Richardson, RXI AIAN Collaboration Director, attended a National Indian Education Conference in Portland, Oregon, the week of this consultation with members of the National Indian Head Start Directors Association; early childhood and language preservation were on the agenda. Mr. Richardson spent the first 5 years of his collaboration commitment in the community and will include working at the state level with officials on policies. His new aide will foster communication and develop materials.
- *Native Language Preservation*: The Native Language Preservation, Revitalization, Restoration, and Maintenance in Head Start and Early Head Start Information Memorandum ACF-IM-HS-15-02 (http://eclkc.ohs.acf.hhs.gov/hslc/standards/im/2015/resour_im_002_031215.html) demonstrates OHS commitment to Native language preservation.

Comments of RXI AIAN Participants and OHS Responses

Note: Following the consultation, Gloria O’Neill, President and CEO of the Cook Inlet Tribal Council (CITC) submitted testimony. Recommendations are included in Appendix A.

A. NPRM—RXI AIAN Participant Comments

- *Unidentified speaker*: What does OHS consider the timeline for the final rule?
- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, said she did not have an opportunity to comment on the proposed rules and would like her comments shared at this consultation to be added to comments on the rules. She will be submitting them to Alaska Senator Lisa Murkowski.

NPRM—OHS Responses

- Dr. Enriquez said late 2016 is when OHS anticipates the final rule will be released.

B. Facilities Review—RXI AIAN Participant Comments

- *Unidentified speaker*: What is the status of the facilities review? When will it be shared and how will it be used?
- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, said she is happy to hear about the facilities review and asked if Tribes would receive more funds as a result of the study.

Facilities Review—OHS Responses

- Dr. Enriquez said that OHS is finalizing data collection and plans to include cost projections when the report is written. Ms. Majestic said it is too early to release preliminary data because there is such a large body of information. By the end of this year, OHS hopes to have more information about the review. Captain Bialas has asked to stay involved in this review and wants to see it through to conclusion.

C. Government Shutdown—RXI AIAN Participant Comments

- *Unidentified speaker*: What is expected and can Tribes draw down funds?

Government Shutdown—OHS Responses

- Ms. Majestic said OHS has determined that Head Start is an excepted program under the payment management system. However, if there are no appropriated funds, Head Start cannot disburse new funding to grantees with an annual funding month that falls during or after a government shutdown. There will be conversations with affected grantees about this matter if such a situation is likely to occur.

D. Funding Levels, Poverty Guidelines, Appraisals, Non-Federal Share—RXI AIAN Participant Comments

- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, noted that funding levels do not keep up with the cost of services. For example, salary expenses exceed the line item for salaries. She asked that the grant address 100 percent of costs. It is important to have quality programs and to address true costs. She is willing to help determine the actual costs of living in Alaska. Furthermore, Alaska income guidelines are not aligned with poverty in Alaska. The cost of rent in Alaska absorbs take-home pay. The Tribes are struggling to serve families most in need. She suggested that Alaskan Tribes partner with OHS to fund an initiative on costs in Alaska and Hawaii to ensure remote children are served.
- *Ethan Petticrew, Tribes of Cook Inlet*, agreed that the poverty guidelines are a huge problem for Alaska. In rural areas, families can pay \$7.00 for a loaf of bread. In Anchorage, the pay is \$10.70 per hour and families cannot afford to pay rent for an apartment. There should be a study to look at true poverty in the state to realign poverty levels to those most in need. He also mentioned that obtaining appraisals for in-kind properties is difficult because it is so hard to find appraisers. They charge high fees and offer appraisals only for a 1-year period. The appraisal requirements are not listed in the directions for the 5-year grant. The programs need clarity on this issue.
- *Mark Wasierski, APIA*, also pointed out the inequities in Alaska of the income guidelines. He noted that these are legislative issues but that it is important to have advocacy from leadership to change them and to study the situation and align it to reality.
- *Connie Wire, Tribes of Cook Inlet*, said insurance rates have gone up and food and gasoline have increased in cost.

- *Anne Shade, Bristol Bay Native Association*, said there are three donated classrooms in elementary schools, but the program is prohibited from claiming them as non-federal share due to the rules about the administrative cap. They propose exempting the non-federal share from the administrative cap. She also stated that there seems to be a different process to apply for non-federal share waivers for Region X and RXI. The grantees need guidelines that apply across the board.
- *Lisa Rieger, Tribes of Cook Inlet*, said the federal finance staff is not at the table to guide them. Also, the Enterprise System does not advise in writing what is allowed or not allowed. The appraisal requirements are a good example. Grantees need information in writing.

Funding Levels, Poverty Guidelines, Appraisals, Non-Federal Share—OHS Responses

- Dr. Enriquez indicated her interest in working with the Tribes. She proposed getting all comments for the record and then strategizing on issues and solutions. She will hold certain people accountable going forward and hopes to report progress on a quarterly basis until the next consultation.

E. CLASS—RXI AIAN Participant Comments

- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, said that low CLASS scores might be the result of a poor day in class. It would be better for OHS to work with Tribes on areas of non-compliance. Tribes are eager to fix problems and would like to avoid a finding on one day that puts them into the DRS.
- *Ethan Petticrew, Tribes of Cook Inlet*, said CLASS is a problem because the tools are assimilationist in nature. This type of feedback and language modeling does not fit well in Native Country in Alaska. Children and others make their own types of responses, and this does not always include eye contact and chatter. Therefore, the Alaskan classrooms score low in these areas. Although scores are coming up, this may indicate a response to assimilationist efforts that destroy language and culture and bring Tribes into ethnocentric, white-dominated society. The Tribal languages are in shambles, and there is a high level of dysfunction in families. Children in Alaska use eyebrows for expression and this is not captured in CLASS. The Tribes want OHS to consider the option of using tools other than CLASS and allowing Tribes to create their own local tools that are unbiased and developed by trained Native Alaskans.
- *Racquel Martinez, Tanana Chiefs Conference*, asked about CLASS observation expectations. Her Tribe had 3 sites out of 10 studied. In another area, she learned that all classrooms were observed. She asked if reviewers should look at all classrooms, or pick one or two.
- *Connie Wire, Tribes of Cook Inlet*, said CLASS scores do not capture nonverbal communication. Programs are required to do the job of kindergartens much earlier. The academic pieces are too prescriptive.
- *Mary Willey, Fairbanks Native Association*, said CLASS is not relevant to any culture in the world and if other Regions had consultations, OHS would hear it is not

culturally relevant in those locations. It should be used as a professional development tool, not a punitive tool.

- *Mark Wasierski, APIA*, said that people use the term *trigger*, and he believes that is an appropriate term for CLASS.

F. DRS

- *Racquel Martinez, Tanana Chiefs Conference*, asked what data other than CLASS is available to show DRS is improving the quality of programs. Are new programs improving quality when replacing former programs? In the re-competition process, how many slots have been lost? Are there data to share? She also mentioned that her Tribe was in DRS due to CLASS scores. They did not receive needed T/TA because funding was not available. The T/TA they received was based on a model from the lower 48 states that did not work in their program, and it did not make a difference. T/TA should meet a program's needs, not just offer what is convenient. They were told there would be assigned coaches, but in the end they had to coach their own staff.
- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, raised the following issues:
 - Her Tribe wants OHS to understand there should be more two-way communication on issues as they arise in programs. The threat of DRS is not a good way to promote government-to-government relationships. The Tribes need time to address issues.
 - OHS should ensure reviews are standard and equitable across the nation. The Tribes in Alaska want reviewers to understand the difficulty in rural and remote programs. Doctors scheduled to visit tribes will get out of rotation due to weather and will not be able to visit programs. The reviewers should understand this difficulty and the outcome.
- *Albert Reinhart, Rural Alaska Community Action Program, Inc.*, said DRS is stressful for programs and staff.

G. EHS/Child Care Partnership—RXI AIAN Participant Comments

- *Jessica Farley, Kawerak*, noted problems with the partnership:
 - Funding levels are too low, and their EHS/Child Care Partnership grant is \$5,000 short per child. The funding model does not work for the partnerships. If all sites have child care authorization, funding does not cover the base amount. Reimbursement rates are low. The grant is funding only 65 percent of need.
 - They are 195 days into the partnership grant with no formal T/TA.
 - They are under pressure to meet teacher standards and need teachers who have the Child Development Associate (CDA) Credential™.
 - State systems are not in place for authorizing children.
 - Low-income parents pay 10 percent of their income to participate. Over-income parents should contribute, or the requirement should be dropped.
 - State licensing organizations are not educated on the partnership; this results in duplication when applying for licenses.
 - The grantee wants the startup period extended to address their problems.

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H. Full-Day/Full-Year Programs—RXI AIAN Participant Comments

- *Ethan Petticrew, Tribes of Cook Inlet*, said he is unsure how full-day/full-year programs would look. Will funding be cut in half? Ten of their classrooms are half day. Does that mean there would be five full-day classrooms? What happens to the other children? The program cannot rent another five classrooms easily. Full year is a bigger concern. He is opposed to some regulations controlling attendance. They have less than 85 percent attendance at certain times. For example, there is a fish camp in rural Alaska, and many people participate. Even urban families participate in subsistence activities. He would like to see the government offer a grace period at those times. Subsistence activities are a source of food for families and help due to the high cost of living. In May and June, they fish, hunt, and gather. The model for the lower 48 states does not fit in Alaska. The costs in Alaska are much higher.
- *Connie Wire, Tribes of Cook Inlet*, recalled learning from her grandmother and said the education piece in programs is important but can dishonor grandparents and culture. Also, boys learn to be men from hunting with men.
- *Anne Shade, Bristol Bay Native Association*, noted that their program has children for 4 hours. If they stay longer, they will be napping in the centers.

I. Slot Conversion—RXI AIAN Participant Comments

- *Racquel Martinez, Tanana Chiefs Conference*, said the Tribe is in the third round of conversion. The first conversion took a full year; in the second year, the information was not entered into the Enterprise System correctly; this year, an Information Memorandum was issued on conversion. She thanked OHS Program Specialist Trevondia Boykin for her assistance. There is a lack of effective progress on this issue by OHS, and it is important for funds to shift. She asked why the Act is not being followed on this point.

J. Child and Adult Care Food Program (CACFP)—RXI AIAN Participant Comments

- *Lisa Rieger, Tribes of Cook Inlet*, said she needs clarification because the state officer overseeing CACFP thinks she, the officer, can designate a percentage of children who must participate. Her group wants her to ask for 100 percent.
- *Ethan Petticrew, Tribes of Cook Inlet*, said CACFP is a major problem for Tribes. They cannot get a Head Start grant without CACFP. A budget must be submitted to the state to obtain reimbursement. The state asked the Tribe not to request 100 percent, and the Tribe is not sure what numbers to use.
- *Mary Willey, Fairbanks Native Association*, said that Tribes find staying in compliance with the CACFP grant requirements difficult; in fact, this grant is the most difficult grant to manage.
- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, explained that she was asked to reduce her budget. However, if the budget is set at 85 percent and attendance is 90 percent, there is a shortfall. She is requesting 100 percent. She

responded to a query by Dr. Enriquez about who is imposing requirements in Alaska and said there is a state employee administering the program for Alaska.

K. Health and Social and Emotional Support—RXI AIAN Participant Comments

- *Lisa Rieger, Tribes of Cook Inlet*, described a successful social and emotional learning intervention several years ago. The Tribe worked with children, parents, administrators, and teachers. Visits to school nurses went down as a result, and referrals to the Office of Children’s Services also went down. Three years later, the children’s academic performance increased. It is clear that early intervention raised academic performance and built resilience.
- *Racquel Martinez, Tanana Chiefs Conference*, noted the need for more attention to health and safety issues. Children are not getting health services. There is a 2-year wait list to see a dentist in one area, and this is inexcusable. Itinerant nurses provide only a Band-Aid solution to the problem. Families are not getting services.
- *Kristen Ramsted, Rural Alaska Community Action Program, Inc.*, asked for collaboration on alcohol use and suicide. They lost two EHS parents to suicide, and this orphaned an 18-month-old. The mother had been a Head Start child. There have been other suicides in the community. She believes the Tribes are losing the comprehensive approach to children and their families due to the emphasis on school readiness.
- *Mary Wiley, Fairbanks Native Association*, believes there should be an emphasis on social and emotional development. Children are failing in third grade because they are pushed so hard on academics. There is a need for social and emotional training. Schools ignore these needs. Parents must advocate for children.

L. Teacher Qualifications and Compensation—RXI AIAN Participant Comments

- *Racquel Martinez, Tanana Chiefs Conference*, said the Tribes want children to have qualified teachers. In their programs, the staff know the children but do not have a degree. Some people with degrees do not know the children. In a rural community, the only way for staff to take classes is online, but they connect to the Internet via dial-up, and so bandwidth is slow. It is impossible to study at home with children at night. It is impossible to take two or three classes. It is important to find the best fit. Large programs such as Tanana Chiefs Conference have remote centers. She also mentioned that there is information about colleges requiring a certain level of ACT scores for admission, which is upsetting to the Tribes.
- *Anne Shade, Bristol Bay Native Association*, asked for a waiver for those requiring an associate of arts (A.A.) degree; the staff need a CDA. Obtaining this takes a year, so they are out of compliance. They asked what they can do about this. It is hard to find qualified people to work for low pay. In addition, after a 3-year waiver of requirements for teacher qualifications, the program cannot renew the waiver. In one case, the program lost its investment because the staff person left and now there is a need to start over. There should be a continuation of waivers.
- *Lisa Rieger, Tribes of Cook Inlet*, said she concurs with comments about teacher qualifications.

- *Kristin Ramsted, Rural Alaska Community Action Program, Inc.*, said the program has waivers for teacher qualifications. However, it takes more than 3 years to get an A.A. degree, and the waiver is expiring. The staff can succeed with the early childhood classes but have problems with English and math in their distance courses. They cannot go to the university campus. Waivers expire in April or September. They will finish the last class on a timeframe that puts them out of compliance for 4 weeks due to the waiver expiration. The 3-year waiver is confusing.
- *Ethan Petticrew, Tribes of Cook Inlet*, said that in the city there are the same problems, and they struggle to keep their teachers. The staff earning Bachelor of Arts degrees apply to the school district for jobs that offer a teaching contract and benefits.

M. Miscellaneous—RXI AIAN Participant Comments

- *Mary Ellen Fritz, Chugachmiut and Tribes of Cook Inlet*, made the following observations:
 - She is glad the session is recorded and noted that the room would be filled with leaders if they felt their voices would be heard.
 - She is pleased that Ms. Kindred offered quality training recently to 10 Tribes attending a coalition.
 - There is a lack of services in rural and remote Alaska.
 - Tribes should determine their own board membership.
 - Ms. Boykin is outstanding as a program specialist who understands Alaska problems.
 - The new section on the Enterprise System for communication is good, but OHS should consider how long documents are pending when grantees request waivers.
 - There is a need for cluster training for rural and remote programs, including funds for travel to those areas.
 - She is happy to see EHS/Child Care Partnerships.
 - *Racquel Martinez, Tanana Chiefs Conference*, suggested creating a workgroup to summarize lessons learned from programs.
 - *Anne Shade, Bristol Bay Native Association*, suggested forming a focus group to discuss E-Rate issues.
 - *Ethan Petticrew, Tribes of Cook Inlet*, said the school districts do not want to see preschool assessments. He believes that the files from preschool should go with the children. He also said that his Tribal program is funded through Region X and should be reviewed as a Tribal program. He also stated that he is happy about the OHS Information Memorandum on language and culture and believes it empowers Tribes.
 - *Mary Willey, Fairbanks Native Association*, suggested that Head Start should put out funding for quality improvements to help programs find and retain qualified staff.
 - *Connie Wire, Tribes of Cook Inlet*, thanked Trevondia Boykin for her support.
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After a break, Dr. Enriquez made a list of topics based on the morning discussion and suggested that participants elect to discuss a topic in groups with at least two people. After a discussion, the group reconvened and presented their thoughts and recommendations. The suggestions are summarized in Appendix A. This summary of recommendations includes suggestions made during the morning session and recommendations by Gloria O’Neill, President and CITC.

Conclusion

Mr. Wasierski introduced Mr. Tuna Scanlan, the Administrator for the Native Village of Akutan. The village has a facility, staff, and population to support the need for Head Start. Mr. Scanlan will talk to the Tribal Council and city officials about the benefits of Head Start and Early Head Start; he thanked Mr. Wasierski for the invitation to the consultation.

Dr. Enriquez said she is proud to be working with the programs. OHS staff is committed to ensuring grantees’ success. One of her priorities is to ensure all Head Starts are high-performing grantees. She thanked everyone for attending and said she had heard their challenges and will begin working on their recommendations. She knows they have monthly calls and would like to report on a quarterly basis on items addressed today. This is a great beginning, and she realizes their commitment and love for children, families, and staff. She asked that they take care of themselves and perform as excellent leaders. She noted that Head Start has been in existence for 50 years and will continue to develop leaders.

Dr. Enriquez added that there are challenges with early childhood, and community partnerships can help. As OHS goes forward to finalize the *Head Start Program Performance Standards*, staff will continue to be committed and true to the ideal of comprehensive services and parent inclusion.

Ms. Majestic said OHS is beginning to plan the next consultations. She hopes the participants who heard the discussion believe that OHS is committed to assisting them in meeting their challenges.

Tribal Consultation Recommendations

A. FUNDING, APPRAISAL, AND POVERTY LEVEL RECOMMENDATIONS

- Recommendations from morning discussion¹
 - Alaskan Tribes should partner with OHS to fund an initiative on determining actual costs in Alaska and Hawaii for programs to benefit children in these remote areas.
 - OHS leadership should advocate to change poverty guidelines in Alaska after studying the rates and costs.
 - OHS should list the requirements for appraisals in the directions for the 5-year grant and on the Enterprise System. The programs need clarity and written guidelines on this topic.
 - OHS should provide guidelines on non-federal share waivers that apply across the board to avoid the different application processes in Region X and RXI.
- Remove the requirement for an annual appraisal for use of facilities, an onerous financial burden for programs. (Testimony of Gloria O’Neill, CITC)
- Remove the barrier to allowing administrative costs devoted to programs but over the 15% cap to count toward in-kind when they are supporting the program.(Testimony of Gloria O’Neill, CITC)
- Allow Tribes to develop income eligibility guidelines for children in accordance with their sovereign right to serve their children. At a minimum, follow the federal Medicaid guidelines.
- Set up a separate cost reimbursement system for rural and remote programs because shipping to those areas is so costly.
- Develop a federal initiative to assess how Tribes are managing funds, their needs, and the condition and challenges faced by RXI AIAN programs.
- Consider removing the non-federal share because every program is submitting non-federal share waivers. Families are working and cannot contribute time. Budgets built on waivers are waiver dependent.
- The non-federal match waiver process should be implemented as a blanket waiver for the life of program operations for tribal Head Start and Early Head Start programs. (Testimony of Gloria O’Neill, CITC)
- Clarify federally approved rates and recognize negative rates.
- Include Head Start in 477 plans to compact federal funds. This could be a problem for new programs but could be offered to established programs.
- For EHS/Child Care Partnership grantees, require all families to contribute on a sliding fee scale basis. (Also in the testimony of Gloria O’Neill, CITC)
- Name a liaison between OHS and the Office of Child Care in all states.
- Ensure all state programs administering federal funds have the same funding guidance.

¹ In these recommendations and those that follow, only those specifically identified as from the morning discussion came up during that part of the meeting. All other recommendations came from the afternoon discussion.

- In Alaska, ensure that Tribal child care and non-Tribal child care agree on requirements.
- Name a liaison between Region X and RXI on AIAN program issues.
- Ensure that all major consortia in Alaska that share funding sources partner and communicate clearly at all levels.
- Limit the number of grants managed by federal staff. The fiscal staff is not responsive, and they seem overloaded.
- Require fiscal staff to answer questions in a polite and timely manner and in plain English language. (Some fiscal staff members are hard to understand on the phone.) Tell them to issue guidance that is specific and uniform. They should not be making up rules.
- Advise federal staff not to demoralize Head Start directors.
- The Enterprise System should provide the type of advance confirmation required by the new OMB regulations. (Testimony of Gloria O'Neill, CITC)

B. DRS RECOMMENDATIONS

- Ensure there is more two-way communication, and do not use DRS as a threat. The process is a problem.
- Create a task force or committee to evaluate and make recommendations about DRS based on an analysis of what occurred in Cohorts I–III.
- Extract all DRS trigger data and identify those programs in DRS due to CLASS. Analyze non-CLASS triggers and determine if DRS made a difference and led to a change in quality. Compare AIAN to non-AIAN programs. Determine if grantees that obtained grants were later in DRS. Analyze this and other DRS data.
- Ensure that the DRS process includes timely responses and follow-through and meaningful T/TA. Do not use DRS as a threat.
- During recompetition, do not attach slots to the funding announcement.
- Identify how many slots have been lost as a result of recompetition.
- Offer non-AIAN programs the opportunity for consultation and reevaluation before recompetition.

C. NATIVE AMERICAN LANGUAGE/CULTURE RECOMMENDATIONS

- Allow the alignment of the OHS *Head Start Early Learning Outcomes Framework, Ages Birth to Five* with Alaska's early learning guidelines/standards. Allow programs to be responsive and to adapt to local standards.
- Develop curriculum and assessment that is relevant to Alaska. Use resources and activities that align with the curriculum and that are relevant to the Alaskan children. Align with language immersion and culture and create a rich environment
- Decide how best to document progress to avoid redoing the work in the future.
- Collaborate with school districts for outcomes, and ensure the schools continue making progress on language and culture. There are obstacles to this.
- Ask Alaska State government to develop a whole language department and to work with students through Tribal home visiting.

- Create fluency among young people by building Native language speakers and teachers and involving the elderly in training youth. Many elderly do not want to teach but should work with Tribes and local organizations.
- Allow Tribes to control teacher qualifications. This relates to Tribal sovereignty. Tribes must be able to decide who is eligible to teach the Native languages.
- Tribes need flexibility and culturally based programming to provide the best and most effective Head Start services to families. (Testimony of Gloria O'Neill, CITC)

D. CLASS RECOMMENDATIONS

- Recommendation from morning discussion
 - OHS should consider the option of using tools other than CLASS. Allow Tribes to create their own local assessment tools that are unbiased and developed by trained Native Alaskans.
- Do away with CLASS for DRS and use it solely for professional development. Do not use CLASS to trigger DRS.
- Use a tool for assessment that examines the full year, such as Teaching Strategies Gold in Alaska. This would allow Alaska to use data already collected, including reports and written observations. Avoid judging programs on 1-day monitoring visit.
- Drop the 10 percent trigger in CLASS. In CLASS, even if programs are doing well, the lowest 10 percent will face DRS. This uses a bell curve. The level for 10 percent will keep increasing. During reevaluations, programs can score lower than the 10 percent trigger and succeed. The 10 percent trigger should be dropped.

E. SCHOOL READINESS AND SOCIAL AND EMOTIONAL RECOMMENDATIONS

- Recommendation from morning discussion
 - OHS should collaborate with grantees on prevention of alcohol abuse and suicide.
- In Alaska, school readiness is related to social and emotional goals. If the social and emotional goals are being met and the environment is developmentally appropriate, school readiness will happen naturally.
- Integrate culture and language into social and emotional and school readiness goals. Involve families in creating goals, and realize no one size fits all.
- Recognize that a family's culture, language, and social and emotional stability tie together. This is more important than forcing academics. Emphasize social and emotional needs, respect culture and language, and do not force learning on 3-year-olds. Leave the kindergarten curriculum at that level. A great deal of learning happens within families.
- Realize that tests are about winners and losers, and the relevance of terms may be different in Alaska.
- Ensure that Head Start academic standards do not undermine tribal programs' abilities to highlight culture and to address social and emotional factors that provide resilience against the trauma and

poverty-related issues that often arise in the children served. (Testimony of Gloria O’Neill, CITC)

F. NON-FEDERAL SHARE RECOMMENDATIONS

- Streamline the waiver process for non-federal share.
- Allow parent volunteer time to count as in-kind contributions, or drop the non-federal share requirement.
- Discuss space allocation funding.
- Remove the administrative cap from the non-federal share.
- Determine a way to arrive at the non-federal share for in-kind donated space.

G. TEACHER CREDENTIAL RECOMMENDATIONS

- Recommendation from morning discussion
 - Teacher qualification waivers should continue past the initial 3-year waiver period.
- Staff need additional time to complete CDAs and other required degrees. Programs also need funds to pay for higher education coursework and to better compensate teachers who have earned degrees.
- Give community members credit for prior learning.

H. E-RATE RECOMMENDATIONS

- Recommendation from morning discussion
 - Form a focus group to discuss E-Rate issues in Alaska.
- Leadership at OHS can argue that Head Start is standards driven and similar to school districts in that way. Head Start should not be treated differently from the schools and should benefit from E-Rate. Allowing the E-rate for schools but not Head Start makes Head Start/Early Head Start programs more tenuous and puts unnecessary stress on the programs. (Also in the testimony of Gloria O’Neill, CITC)

I. CACFP ISSUES AND SUGGESTION

- *Reimbursements*: It is too difficult to get reimbursements from the state. Programs need clarification about what is an acceptable budget so they can obtain reimbursement from the state. Now it is guesswork. Why not claim 100 percent of Head Start children for breakfast, lunch, and snacks, given that the Head Start Act requires programs to apply for funds? Why can’t Head Start programs simply turn in attendances?
- *Unannounced Visits*: The State Office Administrator said they would follow Head Start guidelines for unannounced visits, and they are now performing CACFP reviews unannounced.
- *Food manager and costs*: Some reviewers said that there had to be a food safety manager or a program was out of compliance. Also, if there is 2 percent milk and not 1 percent, the cost is not reimbursable. (Mr. Wasierski said the regulations state that there should be one manager per every five sites. Mary Ellen Fritz, Board of

Directors Treasurer of the Tribes of Cook Inlet, spoke about the law stating a requirement for one person controlling remote sites.)

- *State pass-through of federal CACFP dollars:* This is a political issue in state government. When the state is in control of federal dollars, can they impose state guidelines? (Also in the testimony of Gloria O’Neill, CITC)
- *DRS:* Losing CACFP funding is a DRS trigger. It puts the entire organization in a bad light because this is considered a serious deficiency and is grounds for debarment.
- *Budget requirements:* The Alaska representative of CACFP required modifying the budget to show that 50 percent of the budget was based on food last year. This year, the same person said that was best practice. This person is using personal recommendations.
- *Child Care partner and CACFP:* Can an EHS partner use the Child Care partner’s CACFP?
 - Ms. Majestic said this would be reported under other funding that supports the budget. She asked to be alerted if there are problems with this.
- *Board signatures:* Ms. Shade noted that their 32 board members are required to sign annually that they have no conflict of interest. This is difficult in small villages, and they keep the signatures at the Tribal location.
- *Funding:* Consider pulling Head Start and Child Care funding out of the CACFP. Allow the Office of Child Care and OHS to monitor spending.
- *Suggestion:* Work at the state level to resolve issues between the State Department of Education and the U.S. Department of Agriculture.

J. Full Day/Full Year

- Because families engage in subsistence activities at certain times of the year, the government should offer programs a grace period at those times so that low attendance is not an issue.

K. Miscellaneous

- Recommendations from morning discussion
 - Address the need for cluster training in rural and remote areas with funds for traveling to those areas.
 - Create a workgroup to summarize lessons learned from programs in Alaska.
 - Send files from preschool to kindergarten.
 - Issue funding for quality improvements to help programs find and retain qualified staff.
- Allow working families’ access to high quality child care. (Testimony of Gloria O’Neill, CITC)
- During collaboration between Head Start and Child Care, OHS staff should arrange closer communication with and participation of finance specialists from the Administration of Children and Families. (Testimony of Gloria O’Neill, CITC)

Tribal Consultation Participants

Federal Staff and National Contractors

Last Name	First Name	Position	Organization
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Enriquez	Blanca	Director	OHS
Gallanos	Anji	Region X Head Start Collaboration Director	Alaska Department of Education and Early Development (EED)
Griffin	Patrice	Early Childhood Specialist	ICF International (ICF)
Kindred	Rhonda	Training and Technical Assistance Coordinator	ICF
Majestic	Frances	Acting Regional Program Manager, American Indian and Alaska Native (AIAN) Region XI (RXI) and Director, Program Operations Division	OHS
Powell	Bonnie	Early Childhood Specialist	ICF
Schultz	Janet	Consultant, Region XI	Danya International

RXI AIAN Tribal Leaders and Representatives

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Chinuhuk	Jamie	Executive Director	Metiakatia Indian Community
Farley	Jessica	Program Director, Early Head Start (EHS)/Child Care Partnership	EHS/Child Care Partnership, Kawerak
Fritz	Mary Ellen	Director Partner	Chugachmiut Head Start and Tribes of Cook Inlet
Hasbrouck	Colleen	Early Childhood Development Director	Fairbanks Native Association

Last Name	First Name	Title	Organization
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Scanlan	Tuna	Administrator	Native Village of Akutan
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