

**OFFICE OF HEAD START
TRIBAL CONSULTATION**

**June 8, 2016
Arlington, Virginia**

Report

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

Introduction

As required by 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 2016, the Office of Head Start (OHS) planned three Tribal Consultation sessions for the purpose of better meeting the needs of American Indian and Alaska Native (AIAN) children and families. The consultations take into consideration funding allocations, distribution formulas, and other issues affecting the delivery of Head Start services in the Tribal 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 such input into its decision-making process related to all matters that significantly affect Tribes and Region XI (RXI) AIAN children and families.

The 2016 schedule follows:

March 7, 2016	Albuquerque, New Mexico
June 8, 2016	Arlington, Virginia
August 8, 2016	Airway Heights, Washington

By Notice in the *Federal Register* dated February 9, 2016, OHS notified RXI AIAN leaders of a Tribal Consultation for Tribes in RXI on June 8, 2016, in Arlington, Virginia. This meeting was held in conjunction with the 26th Annual National Indian Head Start Directors' Association Management Training Conference. The following report reflects introductory remarks by OHS leadership and recommendations raised by RXI AIAN leaders and representatives. (There will be separate reports for each Tribal Consultation listed above.)

Participants

OHS presenters: Dr. Blanca Enriquez, Director, OHS, and Ms. Angie Godfrey, Regional Program Manager, RXI

Additional OHS and national contractor staff participated in person. (See Appendix for a list.)

Tribal leaders and Tribal representatives participated in person. (See Appendix for a list.)

Introductory Remarks

Mr. Mike Richardson, Director, AIAN National Head Start Collaboration Office, led the opening prayer.

Ms. Angie Godfrey, RXI AIAN Regional Program Manager, thanked all participants for attending and introduced Dr. Blanca Enriquez, OHS Director.

Dr. Enriquez welcomed all participants, introduced herself, and expressed her appreciation for the invitation. This consultation signifies high respect for the nation-to-nation relationship of Tribal governments and the U.S. government. She stated that she is respectful of the partnership and has learned that Tribal Head Start programs are unique and culturally rich. She has attended several consultations and enjoyed seeing programs, meeting people, and learning about Tribal strengths and needs. She has seen urban programs and their challenges and has learned that those located in other areas, including Tribal reservations, also face difficulties. There is no one approach that works for all programs because each is unique. She looks forward to hearing participants' thoughts and looks forward to the opportunity to work with them.

Dr. Enriquez discussed Mother Earth and her inhabitants. The children and families Head Start nurtures will have a great future if OHS and Head Start programs are good stewards of Mother Nature. She mentioned that Head Start is based on the great visions of its founders. It is part of history and has played an important role in forming the future for children and families. She said she continues to challenge herself to create a positive and productive world for Head Start children and staff. Dr. Enriquez also noted that she brings 30 years of experience and collaboration to her role as the OHS Head Start Director. As a program director, she oversaw 4,000 infants and children and 800 staff. She noted that she is happy that 55 percent of her staff members were former Head Start parents. Now as the OHS Director, she is responsible for 1,600 grantees and 1 million children including the AIAN Tribal children. She is committed to strengthening the program and helping Head Start reach the next level of high performance. Finally, she stressed the need to continue to build resources and strong partnerships. Looking ahead to the next 50 years, OHS wants to continue to work with AIAN grantees; the face of Head Start is in every single grantee. She thanked participants for the opportunity to attend the consultation.

Dr. Enriquez asked Ms. Godfrey to present information about RXI AIAN services in 2015 and 2016. Ms. Godfrey thanked Dr. Enriquez and those attending. She stated that she was honored to attend the consultation and appreciated the participants' attendance and time.

Ms. Godfrey provided an overview of RXI AIAN activities and services using a PowerPoint presentation. She addressed the following topics:

- *RXI AIAN Territory:* A map displayed which states have AIAN grantees. There are 150 AIAN grantees in 26 states.
- *RXI AIAN Background:* There are 92 Head Start-only, 3 Early Head Start-only, and 55 combination Head Start and Early Head Start grantees participating in the 26 states. Total enrollment is 22,601. Funding for Fiscal Year (FY) 2016 totals \$219,107,319.

- *Early Head Start-Child Care Partnership Grants:* The partnerships and expansion grants affect 14 grantees; funded enrollment is 772. OHS is committed to the partnerships and happy to be working with grantees and Tribes that applied for and are working in partnership. Although the number of grantees is small, OHS is committed to helping partnerships grow. A funding opportunity will be announced soon for \$3.5 million. This is smaller than the funding for the first round of grants, but it is important to realize that a grant could support an entire community. Tribes are encouraged to apply for these competitive grants and to work with the Region XI program specialists, who can answer their questions.
- *Funding Opportunities:* The Cost of Living Adjustment (COLA) is set to increase by 1.8 percent. Applications to request COLA funds are due by June 15, 2016. COLA increases will be provided to programs through a permanent, non-competitive grant program. Duration grant applications are due on June 24, 2016, and also are noncompetitive. OHS is seeking duration grantees who do not serve all Head Start children for at least 1,020 hours per year and Early Head Start children for 1,380 hours per year. Grants will be awarded to serve up to 40 percent of the Head Start children. Ms. Godfrey noted that Family Child Care (FCC) programs also Early Head Start grantees eligible for Duration Grants. She offered to serve as a resource on FCC. There also are one-time funds available at the end of the year; these requests are sent to the budget office. The funds issued may cover health and safety concerns, buses, and other compelling needs. Grantees should discuss requesting these funds with their program specialists.
- *RXI Monitoring Data:* A slide listed the types and numbers of monitoring reviews in 2015; these reviews resulted in identification of a small number of areas of noncompliance and deficiencies. Ms. Godfrey noted that OHS is pleased with the monitoring results that show improvement in all AIAN programs.
- *Classroom Assessment Scoring System (CLASS™) Scores:* Tribes scored well and were strong in two areas—Emotional Support and Classroom Organization. In both areas, Tribal grantees scored higher than the national average. In the Instructional Support area, there are questions about what should be measured. There is a session about monitoring at this meeting for RXI with OHS Specialist Adia Brown. OHS knows this is a concern for directors and Tribal leaders.
- *Challenges Facing Grantees:* Program specialists are working with Tribes on enrollment and under-enrollment. OHS has made this a priority and wants to gain insight about under-enrollment. Ms. Godfrey thanked all Tribal leaders for participating in under-enrollment calls. This work is succeeding, and OHS is seeing changes. OHS does not want to see full enrollment for only a few years but, rather, for the long term. Other challenges involve staff qualifications, fiscal systems, CLASS, the Designation Renewal System (DRS), and facilities. OHS wants to hear from Tribes about these issues.
- *DRS Summary:* A slide summarized the DRS activities involving RXI Cohort 4. Their reevaluations were successful in the spring of 2016; all cohort grantees have or will receive letters providing 5-year grants.
- *Facilities Assessments:* The assessment was thorough and involved 147 AIAN grantees and 439 (87 percent) of the facilities. The report has been approved by Administration for Children and Families' and now is being cleared through the Department of Health and Human Services. OHS has hired two new consultants to assist with facilities work; they

will work with the training and technical assistance contractor, ICF, Inc., and Ms. Rhonda Kindred. Their specialties are environmental health and architecture. The end goal is to obtain funding to support facility improvement. Ms. Godfrey stressed that a great deal of work has been accomplished to support OHS's interest in improving Tribal facilities.

- *Executive Summary of the Tribal Language Revitalization and Preservation Report*: The summary is available at this meeting. There is a new committee working on this topic with Mr. Richardson and the National Centers. The committee will strive to understand the language strengths of communities and support their efforts.

Comments of RXI AIAN Participants

A. Preservation of Language and Culture—RXI AIAN Participant Comments

- Tribal elders want to assist with language instruction but may not want to return to school to obtain credentials.
- The Tribe has many strengths including language preservation. They are interested in sharing their language preservation efforts with other Tribes.
- Language revitalization is important to the Tribe. Their language is dead, and they face a big culture gap. Their four certified teachers are not fluent. They are seeking resources for this problem.
- The Tribe preserves its language. Their members should be allowed to teach culture and language, and Tribes should be able to use elders in the classroom as teachers.
- The government took away the Tribe's language and is now dictating how to teach it and who teaches it. The Tribe is joyful that children are learning the language. Some children recently created a Head Start drum. Nine 5-year-old boys sang with the drumbeat at a Head Start graduation in their own language. In Michigan, the Tribal language is taught in public schools including colleges, and the Tribe certifies its own teachers. He asked why the federal government is using different rules.

B. DRS, CLASS, Monitoring, and Reviewers—RXI AIAN Participant Comments

- DRS reviewers are oppressive and onerous, recommended doing away with the DRS process.
- Scientific research principles should be used to support assessment. DRS has not been tested on AIAN populations to ensure validity, reliability, and fairness when assessing teacher performance. There is no evidence of the impact on Tribal populations. There are serious concerns about cultural appropriateness and reliable standards. Furthermore, there is inadequate training for CLASS reviewers on AIAN cultural differences. There are issues with continuing to place programs in the bottom 10 percent of domain thresholds into DRS. There is an unrealistic expectation for achieving adequate levels of competency. The 10 percent standard should be eliminated from Part 1307 of the *Head Start Program Performance Standards* (HSPPS), low CLASS threshold scores should be treated as areas of non-compliance, follow-up reviews should be scheduled related to areas of non-compliance, collaborations should be planned, and efforts should be made to identify proficient reviewers who are culturally competent. The focus should be on formative not summative measures to allow for improvement. There should be additional funds to support the purchase of CLASS materials, additional funds for training, and a

formal grievance process for CLASS findings in DRS. Continuing education should be offered, perhaps through Tribal Colleges and Universities (TCUs), to enhance evaluation efforts. Tribes have voiced concerns about the lack of professionalism and sensitivity by monitors. Reviewers need to be aware of Tribal issues and be culturally competent. Their Tribe has not had one reviewer from a Native community. He recommended that the monitoring contract provide adequate competency training and volunteered to assist with training. He also stressed that OHS should increase recruits from Native communities and offer grantees the chance to provide feedback about the reviews. In addition, he suggested that the TCUs be involved in training reviewers and replace training by outside companies.

- The Tribe supports CLASS revision because at this time, the instrument is not culturally sensitive. Native children adapt to change so they can score high. But it is important for Tribes to come up with a culturally-sensitive system for their own programs.
- The Tribe offered elders to help reviewers with assessments, but this resource was declined.
- Assessments should not be used as a tool that threatens re-competition in DRS. He thinks assessments should be used to help teachers improve. A tool should be changed if it is culturally irrelevant or works against culture. Tribal children use nonverbal communication, but that is not credited to them in a review; the class is marked down. If a tool is culturally irrelevant and insensitive, it is not being used properly. Also, using the bottom 10 percent as a threshold for DRS is an archaic form of using the bell curve as a measure. Instead, OHS should celebrate if programs are raising their scores.

C. Facilities—RXI AIAN Participant Comments

- There are concerns about safety and are happy to hear about the facility assessment. They hope the community can obtain improvements.
- The Tribe wants facility growth because they are at the maximum capacity and want to add space.
- It makes sense to find a new source of funding for facility improvement. The U.S. Department of Agriculture (USDA) has programs for rural development and offers low-interest loans. This department could be approached to help rural communities. Although there is a backlog of applicants, Tribes could join a list of applicants for a federally guaranteed low-interest loan.
- The Tribe wants to build a facility that can be used for both Early Head Start and Head Start.
- The Department of Defense (DoD) has building expansion funding available. He asked that Head Start look into this and referred to *American Indian and Alaska Native Policy and Department of Defense Instruction NUMBER 4710.02: DoD Interactions with Federally-Recognized Tribes*, which is available online at <http://www.tribalconsultation.arizona.edu/docs/DOD/DoD-AI-AN-Policy-Booklet.pdf>.

D. Income and Poverty Guidelines—RXI AIAN Participant Comments

- The only program that serves their children is Head Start, and the nearest cities are a day trip away. Some families do not qualify for Head Start due to the income requirement.

They turned away five families last year, and some will be declined this fall. Some families must move as a result and do not want to leave the reservation. The Tribe would like some assistance with income eligibility issues. It is hard for their families to adapt to the city.

E. Grant Continuity, Duration Grants, and the Grants Process—RXI AIAN Participant Comments

- The current system of income redetermination undermines continuity of Head Start services for families. Families who become over-income suffer loss of services. When they lose services, they may lose employment. It is important to note that the families have the same issues and barriers even when employed. To sustain their progress, continuity of services between Early Head Start and Head Start should be established. OHS should recognize the Early Head Start and Head Start grants as one continuous grant.
- Why is coverage of full-day, full-year limited to 40 percent of the children in duration grants? What standard is used to determine which children are included? Children lose their skills over the summer, and all should be included in broader programs.
- Concern about language stating that a supplement will be added to base funding for duration of services. Can that be taken away?
 - Ms. Godfrey said the funds will be added to program operations and depend on funds from Congress appropriated each year. Funds will remain available if awarded.
- Communication with OHS about grant applications is a problem. OHS should come out with a list of what is needed. Something is always missing. Requirements for appraisals are unclear, and the Tribes need to see the requirement in print. Grant awards are late. In one cycle they received notice of funding one day before opening and almost had to suspend operations.

F. Expansion Funding and Nonfederal Share—RXI AIAN Participant Comments

- Tribes have waiting lists and want to expand. They have applied for grants for facilities and are interested in the OHS expansion funds for Early Head Start.
- The Tribe has had no expansion funds for a long time. They could use this funding to focus on the workforce or other issues. Expansion funds offer the opportunity to focus on problems.
- The Tribal Council pays for extra classrooms, and they prioritize Head Start. Yet, the Tribe has a wait list and needs expansion funds to serve their children.
- Finding 20 percent for the duration grant will be difficult.

G. Teacher Qualifications, Training, and Compensation—RXI AIAN Participant Comments

- Professional development to meet staff qualifications is an unfunded mandate that the Tribe cannot finance.
- The Tribe supports waiving qualifications. The Tribe has few resources to pay staff, so staff members leave for higher wages.

- There should be legislation to make wages comparable to those of kindergarten teachers. Indian Country can be the benchmark if this issue is resolved for Indian teachers. Early childhood education should be respected as a profession.

H. Enrollment—RXI AIAN Participant Comments

- The Tribal Council supports Head Start and has offered funding to support additional slots. They have a wait list.
- Universal pre-kindergarten affects Tribal programs' enrollment. It is easier for families to avoid filling out paperwork by using a public program. She is glad her family has been part of Head Start. She appreciates having the opportunity to speak.

I. Miscellaneous—RXI AIAN Participant Comments

- Head Start is overregulated. This program has more regulations than others managed by the college. He said it is like experiencing a dictatorship and commented that it lacks collaboration and cooperation
- OHS standards are no more burdensome than those of other federal agencies.
- *Tribal Consultations* —
 - For more effective consultations, OHS should assign policymaking officials to attend and not send substitutes. There should be a 60-day notice of meetings, and all dates should be announced at one time. Within 2 to 6 months, summaries should be available, including action steps. After each consultation, participants should have the opportunity to evaluate the process.
 - Ms. Godfrey asked what would be the best way to obtain evaluations of consultations. Mr. Payment said on-the-spot evaluations may not be effective. He suggested doing both onsite and follow-up evaluations with Survey Monkey. He suggested Tribal leaders participate in a focus group right after the meeting.
- *Alignment*—Head Start should be aligned with state education programs. Native children are failing in high school, and public schools are blaming Head Start.
- There is an 80 percent dropout rate for Native high school children in his area. What the school district requires is not supported by OHS standards.
- *Slot Conversion*— The process to convert Head Start to Early Head Start slots is too complex. An easier process should be developed. Slot conversion is cumbersome. Clarity is needed on this subject.
- People should not be turned away after serving on the policy council based on term limit rules, especially in Native settings. She recommended eliminating term limits for Native programs. Three years is too short for a term. It is hard to explain the limits to committed persons.

Conclusion

Ms. Godfrey noted that a great deal of valuable information was shared at the consultation. She thanked participants for their specificity and noted that suggestions were creative. She looks forward to working with Tribes to forge a new path.

Dr. Enriquez recognized that the OHS RXI program specialists attended and said that she believes it is important to work hard to strengthen knowledge and communication at the central and regional offices. The consultations offer opportunities for dialogue. She added that the revised HSPPS should be released by the end of the summer. Their release will help to align systems, such as monitoring. She thanked Tribal leaders and members for attending.

