

**Department of Health and Human Services (HHS)
Office of Head Start Tribal Consultation
August 6, 2018**

Spokane, Washington

Summary Report

Greeting and Introductions

The Office of Head Start (OHS) Consultation began at 1:07 p.m. with comments from Director Deborah Bergeron, Ph.D. OHS continues to tackle issues to better support Tribal Head Start leaders and teachers on the ground. Consultation gives Tribal leaders access to federal staff and an opportunity to share concerns, said Dr. Bergeron. Staff use these sessions to listen carefully before going back to discuss and address ongoing issues in Indian Country.

Fran Majestic, director of program operations, also gave a brief welcome, acknowledging the participants' commitment to children and families. The presence of Tribal leaders at the table demonstrates the importance of Head Start, said Ms. Majestic.

Meaningful Consultation with Sovereign Nations

The Lummi Indian Business Council testified. OHS serves as a Trustee to Indian nations, and meaningful Consultation must provide for the ability of the Indian nations, due to cultural and other differences, to be legally free to educate Tribal children according to cultural norms and values, and in such a way that validates Tribal ways of knowing. Mr. Solomon, who represented the council's education division, stressed the importance of meaningful Consultation and requested a report back from OHS.

Tribes want to move away from outdated policies toward adopting their own identities and healing from past wrongs that have continued under remnant laws. With an expressed desire to save its language, Lummi Nation requested:

- OHS provide funding to develop cultural and language curriculum, including ready-to-use lessons, teachers' manuals and time needed for Lummi teachers to acquire expertise.
- OHS provide funding for instructional materials needed, use audio-video equipment to digitally record primary and secondary sources of Lummi language and culture, then store, catalogue and provide protected access to online lessons for teachers, parents and guardians.
- OHS provide funding to help Lummi Nation acquire the cultural resources needed to validate Tribal ways of knowing.

Survey research, based upon all or broad geographic regions of the United States, reduce America Indians/Alaska Natives (AI/AN) to statistical insignificance. Tribal Head Start programs must have the freedom to promote educational opportunities to youth and participants' families that reinforce Native identities and culture in a way that promotes daily attendance and school readiness.

In addition, Tribes need primary research in AI/AN children that focuses on adverse childhood experiences, resiliency and models of healing social and emotional wounds inflicted by family addictions, domestic violence, deaths due to violence and institutional racism. Native leaders request their own branch of research, said Mr. Solomon.

The Lummi Nation further requests culturally appropriate assessments and opposes using the Classroom Assessment Scoring System (CLASS) to evaluate its Head Start program, added Mr. Solomon. CLASS does not measure Lummi culture or properly recognize the complex cultural traditions present in Lummi Head Start classrooms. Even so, a poor CLASS evaluation can threaten the Tribe's Head Start funding.

CLASS, due to the threat of funding loss, forces English language development over Lummi language. CLASS forces Head Start teachers to learn CLASS evaluation instead of acquiring Lummi language and cultural teaching expertise. Lummi Nation wants to move away from this culturally inappropriate form of measurement and rely on an indigenous way of knowing, said Mr. Solomon.

Lummi Nation recommends full funding for practice-based coaching. Such added funding might include support for coaches and supplemental pay for teachers to attend coaching sessions and related activities. The Tribe recommended cultural-based coaching.

Lummi Nation also highlighted the importance of adequate teacher pay. Unskilled laborers both within and outside the Tribe earn more than the lead teacher at Lummi Nation Head Start. Head Start programs need more funding from OHS to provide higher pay for Head Start teachers. Without higher pay, Lummi teachers depart employment better salaries and benefits. When teachers leave, Head Start classrooms experience a lack of continuity in the level of instruction.

- In January, Lummi Nation declared a public health crisis due to opioids.
- Grandparents as caregivers: Teachers at Lummi Nation Head Start are very young, and many children are placed by grandparents. Teachers must provide feedback to grandparents within an environment where elders are revered, which can create awkward communications.

Lummi Nation continues to request added support for the funding of a comprehensive early-learning, facility-based health center, which would include a medical doctor, nurses, dentists and behavioral health specialists who focus on the needs of children in early learning.

Dr. Bergeron provided a brief response, noting the recurring challenge of providing traditional education and maintaining heritage and culture while preparing children for a world that is different from those traditions. OHS will work to support Native communities that seek to meet both goals. This issue remain a unique challenge and requires ongoing conversation, said Dr. Bergeron.

Many Tribes continue to pursue incorporating Native languages in Head Start classrooms. Tribes want to maintain that history and culture because once community members lose their language, they often cannot get it back, said Dr. Bergeron. OHS also recognizes the need to educate children who can advocate and support Native communities as adults.

Dr. Bergeron agreed to take the comments about CLASS back to OHS. OHS spends close to \$10 billion a year, so there must be some type of accountability for those funds. Federal staff continue to struggle with finding an accountability system that works for a variety of Head Start programs nationwide. Whether OHS uses CLASS or something else, federal staff want to evaluate progress in a way that maintains the fidelity of Tribal programs, said Dr. Bergeron.

As a former public school administrator, Dr. Bergeron appreciated the Lummi Nation's focus on the importance of daily attendance. Educators recognize the direct correlation between attendance and success in school -- and that success begins at a young age. Daily attendance will make a difference in terms of school readiness, added Dr. Bergeron.

OHS will further discuss the idea of a cultural coach. Last, in addressing the opioid crisis, Dr. Bergeron said Head Start has a unique ability to touch local families. As the funding for support around opioids comes to fruition, perhaps Head Start can play a role in the solution. Because children and addicted parents both need support, Tribal leaders and OHS must address the issue together.

Chugachmiut Regional Board. The organization represents many small Alaskan Tribes, and Head Start plays a vital role in these local communities. Chugachmiut testified in the following areas:

- OHS must recognize the Federally Negotiated Indirect Cost Rate Agreements with Tribes and not limit administrative costs. Head Start programs cost a lot of money to administer, and resources remain scarce. OHS must exempt Tribes from the 15 percent administrative cost limitations.
- Tribes must have the opportunity to compact Head Start funds and administer programs in a way that best meets the needs of Tribal members, as long as the lowest-income people have priority for services.
- The Head Start Poverty Guidelines remain critically out of date and do not reflect poverty in rural and remote programs. For example, a single mother with one child can make \$10 an hour and yet be over-income and ineligible for Head Start services if the Tribe is

already serving 49 percent over-income. OHS should adjust the guidelines to reflect poverty in Alaska, at least equivalent to the existing Medicaid guidelines.

- Rural and remote Head Start programs do not have credentialed teachers or other staff living in the communities. Tribes can recruit staff willing to earn credentials, but this effort takes time. Alaska and other remote programs without local colleges seek special approval to operate Head Start and Early Head Start programs while working to develop credentialed CDA staff.
- For Early Head Start (EHS) and the Head Start staff, one year is not enough time to get an Early Head Start or Preschool child development associate (CDA) credential for those who serve as a teacher, home visitor, site administrator, janitor, shopper and all of the roles Tribal members take on in order to operate Early Head Start and Head Start in a small community. Because Tribal members need two years to get a CDA, leaders request approval for staff to continue providing EHS services while obtaining infant and toddler CDAs. Native communities also need funding to pay for college-level classes so preschool teachers who have earned CDAs can comply with bachelor's degree requirements. For grandfathered management staff, programs need professional development funds to begin degree programs for these staff.
- Now that Alaska has a formal Facilities Study, Tribes need funding to repair or replace facilities in Native communities. Tribes also must determine the facilities needed when expanding or adding services.
- The Teacher Mentor Position repeatedly referenced in the revised performance standards is a greatly needed position for continuous quality improvement for sites. The Chugachmiut program, however, does not have the funds to hire a Teacher Mentor Coach. Even if such funds were available, the community would have a difficult time finding someone with the credentials to provide this greatly needed service. As OHS approves new mandates for Head Start programs, funding must accompany these directives so Tribes can comply with these new mandates.

Providing a brief response, Dr. Bergeron noted that Tribes raise the income eligibility issue frequently, particularly as minimum wage requirements go into effect in some locations. OHS staff members continue to discuss and pay attention to this Tribal concern, said Dr. Bergeron.

On the topic of indirect cost rate agreements, Ms. Majestic asked whether Tribes knew about applying for waivers for the administrative cap. Tribal members expressed knowledge of the waiver but had been told waivers are rarely approved. Even so, Tribes that can make a good case for the waiver should apply and inform OHS staff when submitting the application, said Ms. Majestic.

Dr. Bergeron also encouraged Tribes to contact OHS staff directly when difficult issues and barriers arise. OHS puts regulations in place that generally make sense, but those rules do not work for everyone. Head Start has no interest in creating barriers that keep Tribes from assisting children. In talking directly with OHS staff, Tribal leaders might discover possible solutions. OHS staff members want to create effective programs that work well in unique local communities, said Dr. Bergeron. Ms. Majestic recalled when OHS was not looking seriously at nonfederal share waivers. However, now that staff members better understand the challenges communities face, Tribal leaders see greater success in getting those waivers.

The Colville Reservation in north-central Washington operates in four communities, for a total of eight classrooms. This community is a confederation of 12 aboriginal Tribes and the bands from across eastern Washington.

Colville has nearly 9,500 enrolled members, making it one of the largest Indian Tribes in the Pacific Northwest. Mr. Moses serves as a vice chairman of the Colville Business Council's Education and Employment Committee, which oversees Head Start, K-12, youth development and higher education.

Colville Testimony:

- **Competitive wages:** The Colville Tribes seek broad authority over Section 653.42 USC 9848, comparability of wages to determine the average rate of compensation paid in the areas the Tribes serve. Colville is a federally recognized entity with the inherent authority for self-governance. In addition, Colville is a large, land-based community geographically set apart from the rest of American society. In 2015, the Tribes enacted a comprehensive salary scale and salary policy that considers comparable market, geographic location and performance environment.
- **Facilities funding:** In 2003, the U.S. Commission on Civil Rights issued the report titled *A Quiet Crisis: Federal Funding and Unmet Needs in Indian Country*. The Administration for Children and Families (ACF) within the Department of Health and Human Services (HHS) is the focus of this report. Ultimately the commission recommended that all federal agencies that administer Native American programs be required to set aside money for infrastructure building that will benefit all. Federal appropriations must compensate for costs that are unique to Tribes such as those required to build necessary infrastructure, those associated with geographic remoteness and those required for training and technical assistance. Mr. Moses asked OHS to continue to include funding for facilities in requests to Congress.
- **Increased Training and Technical Assistance (T/TA) Funding:** Currently the Colville Tribes receive \$15,668 in T/TA funds for approximately 45 staff members, which equals less than \$350 per staff member. However, requirements for staff to have training in CPR, first aid as well as food handling permits, commercial driver's licenses, CDA certificates, associate's and bachelor's degrees, class self-assessments, coaching,

mentoring and now fingerprinting and federal background checks far exceed the resource limit, said Mr. Moses. The Colville Tribes need additional funding for the recruitment, training and in-service professional development of staff.

Ms. Majestic noted that for T/TA in 2018, OHS tried to level the funding so everyone received 2.6 percent. Some Head Start programs, however, saw a higher increase because over time the T/TA got out of balance. OHS worked hard to raise the training and technical assistance dollars for a number of programs way below the average amount, said Ms. Majestic. Tribes also can use operating dollars for training and technical assistance. The congressional set-aside funding, however, has limits.

Councilman Clifford Wolfe shared details on the Head Start program of the Omaha Tribe of Nebraska. The program, which has 101 students, works closely with local school teachers. In addition, about 30 children between the ages of 3 and 5 will begin Early Head Start this year. Education will open doors for Tribal youth, said Mr. Wolfe, who has served as a cultural teacher in Tribal classrooms. The community has 90 percent unemployment and many female-headed households. Mr. Wolfe thanked OHS for providing busses last year for the Head Start program.

Dr. Bergeron said Head Start programs should coordinate with area schools. Head Start students should show up ready to go, and teachers should recognize these students are on a good path toward the future. Ms. Majestic noted that Head Start program performance standards seek to offer local flexibility for different types of communities within the scope of the regulations. OHS appreciates the dedication required to help young children develop culture and community values. Children will take those values with them wherever they go in the future, said Ms. Majestic.

The meeting adjourned at 2:10 p.m.

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