

OFFICE OF HEAD START
TRIBAL CONSULTATIONS

**CONSOLIDATED
2010 TRIBAL CONSULTATION REPORT**

Presented by:
Yvette Sanchez Fuentes, Director
Office of Head Start

History has shown that failure to include the voices of tribal officials in formulating policy affecting their communities has all too often led to undesirable and, at times, devastating and tragic results. By contrast, meaningful dialogue between Federal officials and tribal officials has greatly improved Federal policy toward Indian tribes. Consultation is a critical ingredient of a sound and productive Federal-tribal relationship.

President Barack Obama
Presidential Memorandum on Tribal Consultation,
November 5, 2009

The Department of Health and Human Services (HHS) has been a leader in the federal government's efforts to improve the partnership with federally recognized Indian Tribes. I want to assure you that the Department respects the Government-to-Government relationship and is continuously striving to find innovative ways to work with Tribal Leaders and improve the services we provide to members of tribal communities.

Secretary Kathleen Sebelius
Department of Health and Human Services
Tribal Leader Letter on Tribal Consultation
October 27, 2010

Introduction

Pursuant to the Department of Health and Human Services Tribal Consultation Policy and section 640 (1)(4) of the Head Start Act, in Fiscal Year 2010 the Office of Head Start convened six Tribal Consultations for the purpose of better meeting the needs of American Indian/Alaska Native (AI/AN) children and families, taking into consideration funding allocations, distribution formulas, and other issues affecting the delivery of Head Start services in their geographic locations. The Office of Head Start (OHS) is committed to meaningful consultation with Tribes through which elected officials and other authorized representatives of the tribal governments have the opportunity to provide meaningful and timely input prior to the development of policies, the development of regulations, the interpretation of existing regulations, or other policies or procedures that affect Indian tribes.

The OHS is committed to seeking input from AI/AN 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 Indian tribes and AI/AN children and families.

By Notice in the Federal Register, dated May 13, 2010, the OHS notified AI/AN leaders of the following schedule for Fiscal Year 2010 Tribal Consultations:

June 16, 2010	San Diego California
June 20, 2010	Rock Hill, South Carolina (cancelled)
July 15, 2010	Green Bay Wisconsin
July 30, 2010	Tulsa Oklahoma
August 16, 2010	Boston Massachusetts (cancelled)
August 27, 2010	Rapid City South Dakota
October 18, 2010	Auburn Washington
October 20, 2010	Fairbanks Alaska

The following detailed Report reflects comments and questions raised by AI/AN leaders and representatives, the responses from the OHS, and areas identified as requiring additional follow-up.

The Office of Head Start Tribal Consultation: San Diego California, June 16, 2010

Participants

Office of Head Start: Yvette Sanchez Fuentes, Director Office of Head Start; Renee Perthuis, Director OHS Division of Program Operations; W.J. Strickland, OHS Senior Program Specialist; Donald Wyatt, OHS Senior Program Specialist; Jan Len, Program Manager, Region IX.

Tribal leaders and Tribal representatives: (See Appendix for detailed listing)

In addition to OHS representatives and tribal leaders and their representatives, a representative from the Indian Health Service, representatives from Danya International (national monitoring contractor), representatives from ICF International (AI/AN Technical Assistance contractor), the Regional Director of First Things First Arizona, a representative from technical assistance provider Three Feathers Associates, and representatives from the California Rural Indian Health Board were in attendance.

Introductory Remarks

The Tribal Consultation Session began with opening remarks from Yvette Sanchez Fuentes. Director Sanchez Fuentes announced the formation June 3-4 of a Tribal Technical Workgroup comprised of representatives of Tribes in each of the eight Regions with AI/AN Head Start grantees for the purpose of receiving direct input on AI/AN Head Start issues and to assist the OHS in planning the FY2010 Tribal consultations. Director Sanchez Fuentes then introduced the *Head Start Roadmap to Excellence* and four priorities that will be implemented over the next two years. These priorities are: revision of the Head Start program performance standards, designation renewal (re-competition), family engagement, and redesign of the Training and Technical Assistance (T/TA) system including six National Centers.

Director Sanchez Fuentes affirmed the commitment of the Office of Head Start to engage in meaningful consultations with American Indian and Alaska Natives governments, the development of clear priorities for moving forward and supporting AI/AN grantees, and incorporating Tribal Head Start programs into the *Head Start Roadmap to Excellence*.

Discussion/Comments of AI/AN and OHS Participants¹ (in the order addressed in the Consultation)

A. Teacher Credentials – AI/AN Comments

- Staff retention is difficult. Many teachers leave for higher paying jobs after earning certification. There is a need for teachers who know the native language. In some

¹ In the Discussion/Comments section contemporaneous Office of Head Start responses are not indicated for every topic due to the need for additional information. These will be followed up.

Tribes, the population is too small to recruit qualified teachers and these Tribes can become non-compliant.

- There needs to be funding for teacher credentialing at the local level. Many staff are single parents and cannot afford to quit work to go to school, but they don't qualify for education grants unless they are full-time students.
- Suggest a special provision for tribal programs since they have fewer dollars.

Teacher Credentials - OHS Response

- The HS Act states that nationally, 50% of Head Start teachers need A.A./B.A. degrees. Programs need to at least have a plan for moving teachers forward. Even if it takes 6-7 years to get an A.A., OHS needs to see a plan that is real and active. This is a legislative issue.
- Staff salaries are determined at the local level based on community assessment.
- Suggest development of curriculum that takes into account life experiences of adult learners so they also earn some credits.

B. Training and Technical Assistance System – AI/AN Comments

- Tribal programs can learn from other tribal programs that are 100% compliant to see how those best practices can be applied.
- Tribal partners in Canada match programs with strong Program Design and Management (PDM) with those with weak PDM. They swap PDM managers for a week.
- Programs with deficiencies can shadow a monitoring review of a program that is compliant. T/TA could pay these costs.
- Too many times, as in the case of Colorado River Indian Tribes HS, the contractor doesn't focus on doing a quality job and meeting the scope of work, but on how much money they can spend. Request that OHS take tribal input and look out for tribal concerns. Tribes take sovereignty very strongly and hold OHS to that.

Training and Technical Assistance System – OHS Response

- Four National Centers are out for proposal. Centers can be located anywhere in country. These are cooperative agreements. It could be an organization that takes the lead with other groups. They will look for models of best practice and if there's no research behind that, they will do the research. They will be repositories for research, best practices. OHS needs feedback on how to make this happen.
 - National Center for Quality Teaching and Learning
 - National Center on Cultural and Linguistic Responsiveness
 - National Center on Parent, Family, and Community Engagement
 - National Center for Program Management and Fiscal Operations
- It is OHS' expectation that the national centers will see what these programs are doing that works well and determine how it can replicated in other programs.
- When the applications are submitted, the paneling process is very intensive. It may take weeks. OHS may do it virtually, but that could make it more difficult to maintain confidentiality. Once the contracts are in place, tribal input will be important

because that's when the contractors will put together work plans. There is a continual process to provide input and to give feedback on how things are working.

- T/TA dollars are set in the law; it's a legislative issue. Tribes can help to increase this 2% cap of overall HS dollars.

C. Working with Regional Offices – AI/AN Comments

- Tribes are reluctant to have Regional Office staff provide assistance. Historically, tribal programs fear they'll be pushed into Regions and there will no longer be an AI/AN Program Branch.
- It may take some time to get comfortable with RO staff coming to tribal programs.
- RO staff needs to be sensitive to AI/AN needs.
- There are some ACF initiatives that are important to families, but OHS can't figure out how to work in AI/AN or Migrant. Tribes shouldn't have to miss out on these initiatives just because OHS in Washington is taking longer to figure this out.

Working with Regional Offices – OHS Response

- It is not the intent to push AI/AN into the ROs. Sometimes ROs can provide training on fiscal matters or general Head Start matters. It can be more efficient for Tribes to go to the nearest training session at the RO versus going to Washington or waiting for months for next AI/AN training.
- OHS is looking at reorganization to balance workload and bring in more expertise. There will be a Federal Register notice about reorganization.

D. Non-Federal Match – AI/AN Comments

- What was allowable for in-kind has been diminished. Suggest reducing percentage of non-Federal share from 20% to 5-10% so that it's more manageable.
- Transportation no longer counts toward NSF.
- Tribal leaders should pursue reduction in NSF percentage so Tribes don't have to keep asking for waivers.
- Bus safety harnesses are an unfunded mandate. But they do work and there is evidence of that. After a collision between a semi and a school bus at Turtle Mountain Chippewa HS, no children were injured because they were all in harnesses. A new bus is \$40,000 to \$80,000, but insurance paid only \$11,000. Safety and health have to be #1.

E. Facilities – AI/AN Comments

- Tribes have inadequate facilities to accommodate children. Issues include bringing buildings up to code.
- Communities need more culturally appropriate equipment such as a tribal dugout canoe as playground equipment so children can reconnect with the culture.
- At Turtle Mountain Chippewa near the Canadian border, there are issues with childhood diabetes/obesity. In this climate, children are lucky to get outside to play. There are no resources to expand. It's difficult to increase children's activity when the climate is so cold.

Facilities – OHS Response

- OHS does not have funding to provide for facilities. It is up to everyone to figure out how to do this better. It's nearly impossible to find funds to fix facilities, and programs end up in cycle of noncompliance.
- Bureau of Indian Affairs used to have a priority list of programs. Perhaps this could work with HS. Congress has continued to ask HS to do more with less.
- There need to be statistics of AI/AN facility needs that Tribes can push through legislatively in order to receive more funding.
- OHS: AI/AN is unique in that HS submits a report to Congress on the condition and ownership of tribal facilities. Indian Health Services inspections provide OHS with this data. If there is any Federal interest in the facility, OHS reports that.
- Programs are encouraged to look at other grant opportunities for facilities, knowing that it will be difficult to get funding from OHS through the legislature.
- There needs to be an inventory of conditions at facilities and a list of priorities of what Tribes think they need and what they want. If nothing else, for history. Now there is nothing.
- Regarding maintenance, there is a mentorship program with some contractors in NM. There are programs out there.

F. Special Expansion - AI/AN Comments

- There needs to be a definition of expansion that includes more than adding slots. Expansion should include adding back staff who were lost and adding back transportation. Give Tribes more flexibility to bring back some things that were lost.
- Expansion of resources. The ARRA Conference Report's intent (see House Report 110-439) was to be more inclusive.
- When IHS got money for a diabetes program in Phoenix, Tribes did a collaborative formula based on population. It could be based on number of children served. This could enable everyone to get an equal share.
- There are many programs in compliance. More funding could assist them in providing higher service.

Special Expansion – OHS Response

- The 2007 Act provides special expansion of \$10M for MSHS and \$10M for AI/AN. Once it reaches, \$50M, MSHS and AI/AN move to regular dollars. Last year was the first time \$10M became available. OHS put that out as competition for AI/AN programs. NHSDA and others asked OHS to consider a different way to make that available. OHS is interested in seeing how Tribes think that money should be distributed.
- OHS is willing to hear tribal recommendations, but recommendations should be supported by the majority of tribal programs. The six tribal associations should agree on a recommendation for how funding should be distributed. This \$10M could still be available in 2011 and 2012.
- AI/AN is getting a \$10M special expansion. There was talk about dividing this among 152 AI/AN programs, with some smaller programs getting more.
- Unless OHS gets something in writing from Tribes, OHS will move forward on what it thinks is best. The sooner the better; the budget has not been approved.

- There are some tribal programs that have been low functioning for many years. OHS has worked with them continuously, but they continue to under-enroll. If the tribal community wants every program to get a portion of funding, be aware that there are programs that are chronically under-enrolled for decades. There needs to be a real distinction between programs operating at a minimum level because they have low resources and those that are intentionally functioning at minimum level and use funding for other things.
- OHS: Last year, this funding was distributed competitively. It was about more children, more hours (expansion). If Tribes disagree on general counsel's interpretation, Tribes can take this back to Congress.
- To go to the next step, Tribes may need a statement/rider (clause) that programs show sincere effort to succeed/to demonstrate programmatic improvement. If Tribes want to do minimum, that's their right. It's not right to keep giving them money.

G. Language and Culture – AI/AN Comment

- Language and culture should be incorporated into family engagement. This would be an incentive for family participation.

H. Partnerships with Federal Agencies – AI/AN Comments

- Suggestion to start relationships with other Federal agencies.
- Not only with health agencies, but education agencies (Bureau of Indian Education) with common goals.
- Wraparound services require programs to partner up. That same partnership should be developed at the national level so they understand all the requirements for tribal programs.

Partnerships with Federal Agencies – OHS Response

- OHS: The tribal workgroup can examine this (national partnering). This was brought up at an AI/AN meeting in March 2010.

I. Health – AI/AN Comments

- More money is spent on prison healthcare than at IHS for community health.
- HS depends on IHS even though they are only funded at 60%. Programs have trouble getting doctors to accept welfare.
- Tribal leaders need to talk to legislature to get IHS budget increased because there is no money for prevention.

Health – OHS Response

- This is not an issue that OHS can take on at this moment.

J. Communication – AI/AN Comments

- Sometimes Requests for Proposals don't reach Tribes in time. Tribes have protocols that involve going through tribal councils, etc.
- One Tribe lost COLA because there were too many questions and not enough time for response. Applications need to get to the Tribes in time.
- Other times, Tribes don't get timely responses from program specialists.

- Grants and program specialists don't talk to each other. Programs end up as the go-between for grants and programs staff. It is difficult to get both grants and program specialists on the phone at the same time.
- Communication from grants and program specialists come in the form of phone calls and emails.
- Enterprise System – programs enter data in timely manner, but Grants Management doesn't use it. One program had an FAA with the old chairman's name. When the program called OHS to ask for name change, they were told to get a letter from the chairman. The program refused because this was like asking to get a letter from the President of U.S.
- Some Regions communicate directly with their grantees. In AI/AN, very little written communication is given to grantees to provide direction.

Communication – OHS Response

- Program specialists can follow up with phone calls, especially if they have urgent messages. Director Sanchez Fuentes has begun to inform program specialists that if they will be out, they need to let grantees know they are out, how long, and who to contact. OHS needs to know which program specialists are not doing this and hold them accountable.
- If Tribes have specific chain of communications they want OHS to follow with regard to tribal administrator, executive director, chairman, etc., they should inform OHS.
- The Director expects any program specialist who is waiting for a response from a grantee to call the program and document this effort. If the grantee is being unresponsive, OHS will deal with that differently. Both sides are accountable.
- Information entered into Enterprise System does not automatically get into GATES. Program specialist needs to manually input this. They should take that information off the grant file. If programs have a recent change, make sure this information is emailed so it can be manually input into GATES.

K. Grants Management – AI/AN Comments

- It's hard when programs are asked for something due immediately. Years ago, programs were threatened with getting written up if they don't respond ASAP. The turnaround time is difficult. More often the request is from Office of Grants Management (OGM), not OHS.
- Funding announcements can't be limited to 30 days because Tribes have tribal government process to go through before they can submit proposal. Tribal leaders are not in the office all the time.
- Tribal programs need at least 3 months notice. Process includes: writing application, taking it to policy council for approval, and getting it on tribal council agenda 30 days in advance for review. After tribal council approves, the application might not get signed for another week.
- If there is a change in the grants specialist, ensure that instructions from the previous specialist are passed down to the new specialist so that communication to grantee is consistent.

Grants Management – OHS Response

- The Director does not have oversight of OGM but is looking for a strategy to bring these issues to OGM colleagues.

L. Federal Staff Turnover – AI/AN Comments

- Federal staff turnover is high. One program has gone through six grant specialists over the past 3 years. This is especially difficult for new grantees.
- When there is turnover, outgoing and incoming specialists should call to introduce themselves to grantees.

Federal Staff Turnover – OHS Response

- OHS gets certain allotment of Federal openings a year, and it's distributed across all Regions. That's why contractors are used to supplement lack of Federal staff.
- In recent past, if a Federal staff left, it wasn't guaranteed that the position would be backfilled. It can take many months to fill positions.

M. Risk Management Meetings – AI/AN Comments

- Programs are supposed to receive risk action plans following risk management calls, but one program waited four months before receiving the plan. Then the program was asked about its follow-up.
- Suggest that programs specialists let programs know when they receive risk management information and have cleared it out of Enterprise System. Programs fear this could delay their funding.

Risk Management Meetings – OHS Response

- OHS does *not* hold up funding because of action plans.
- If programs are told their grant will be held up, they have the right to contact their RPM so that this can be corrected. Specialists are conduits for getting information and make recommendations to the RPM and GMO.

N. Grant Applications – AI/AN Comments

- Some programs don't receive any questions until the third month, which makes it difficult to respond in a timely manner.

Grant Applications – OHS Response

- Programs are required to submit grant applications 90 days before grant is due because of complexity of the grants and the different workloads that specialists carry. We require the grant be cut 30 days out. Any questions from specialists should be asked within the first 60 days.
- When an application is received, it goes through initial grant review. Then it gets distributed to grants and program specialists within 2-3 days. Grants and program specialists get the application on the same day. Within first 3-4 weeks, program specialist arranges call with grantee and invites grant specialist to join the call to discuss the application and identify any issues. That gives grants/program specialists one full month to do analysis and make documentation. Contractors enter data into GATES (accounting system). Grants and program specialists are expected to work side by side and communicate issues in a team manner.

- In the Central Office, the grantee load for specialists is similar to that of Regional staff. Specialists located in the Central Office often get pulled into national issues, as opposed to RO staff who can focus exclusively on their Region.
- If programs have a history of not hearing from grants or program specialists until the last minute, they can call the specialist(s) and e-mail them after the first 30 days to ask if there are any questions or feedback. Send copies to Director Sanchez Fuentes and David Kadan, Grants Management Officer. There will be no retribution.

O. Business Processes – AI/AN Comments

- With regard to OHS Policy Clarifications (PCs), they are helpful as long as they are accurate.
- We suggest notifying grantees when PCs are updated, since PCs for AI/AN are still listed as “under development” online.
- Cross references would be very helpful for consistency between grants and programs.

Business Processes – OHS Response

- OHS has been instituting business processes for consistency. If ROs are issuing policy guidance, OHS needs to know. Policy guidance should come from national level. OHS wants information to be correct.
- ROs don’t typically issue policy clarifications, but some procedures may differ across Regions.

P. Eligibility – AI/AN Comments

- Question: Whether a tribal program can enroll over-income tribal member over income-eligible non-Indian children? If there is another HS program in the service area, is it allowable to enroll an over-income Indian child and refer income-eligible non-Indian to the other program?

Eligibility –OHS Response

- OHS will review this (enrollment practices) and will disseminate clarification to Three Feathers Association for listserv and via Policy Clarification.
- Information presented in Webinars from National Head Start Association is not coming from OHS. Questions on important matters may be sent to program specialist and cc: Director Sanchez Fuentes. OHS will provide guidance for free.
- NHSDA and National Congress of American Indians have provided testimony that they want every child served regardless of income.

Q. Budget Revisions – AI/AN Comments

- When a grantee needs to adjust its budget during the grant year, what is the level of funding that they can shift around without having to get approval from Federal office? Programs need a resolution of this matter.

Budget Revisions –OHS Response

- The struggle is being able to flex money within the budget. OHS is working with Grants Management staff to understand and address options for moving forward in

allowing as much flexibility as possible within government-wide requirements including OMB policy.

R. Policy Council – AI/AN Comments

- Term limits of the Policy Council should be changed. Programs are running out of parents who are eligible to participate.

S. Head Start Impact -- AI/AN Comments

- 15 out of 23 staff are current or former parents. This shows HS is working.
- That used to be a question on the PIR. One program has 73 employees. Of those, 68 are current or former parents.

T. Wrap up and Identification of Priorities – AI/AN Comments

1. In-Kind, Non-Federal Share
 - Waiver revision (20%)
 - Training from OHS – programmatic
 - Change in 20% – legislative
2. Facilities
 - Building inventory/priority listing
 - OHS can be clearer about how to prioritize funding
3. Special expansion dollars
 - Equitable distribution formula (\$10M)
4. T/TA dollars to support professional development/staff qualifications
 - Mostly legislative
5. Improvement in business practices
 - This could be on AI/AN and OHS side
 - Improve Communication

The Office of Head Start Tribal Consultation: Green Bay Wisconsin, July 15, 2010

Participants

Office of Head Start: Yvette Sanchez Fuentes, Director Office of Head Start; Shawna Pinckney, Office of Head Start; Kay Willmoth, Regional Program Manager, Region V; and Anita Samuels, ACF Fellow.

Tribal leaders or their representatives: (See Appendix for detailed listing)

Introductory Remarks

The Tribal Consultation Session began with opening remarks from the Director of the Office of Head Start, Yvette Sanchez Fuentes. Director Sanchez Fuentes affirmed that tribal consultations were an opportunity for the Office of Head Start (OHS) to learn from American Indian/ Alaska Native (AI/AN) tribes. In addition, while AI/AN Head Start grants are not administered in the Regional Offices, Director Sanchez Fuentes stated that OHS wants AI/AN Head Start programs to establish relationships with Regional Offices and that Regional Office staff know what resources may be available within states.

Director Sanchez Fuentes then introduced the *Head Start Roadmap to Excellence* and the four priorities from the *Roadmap* that will be implemented over the next two years. These priorities are: revision of the Head Start program performance standards, designation renewal (re-competition), family engagement, and redesign of the Training and Technical Assistance (T/TA) system including six National Centers. In addition Director Sanchez Fuentes shared with participants the five issues participants in the San Diego Tribal Consultation had identified: non-Federal match and in-kind contributions, facilities, expansion funding, training and technical assistance, and improvements in communication and business practices.

Director Sanchez Fuentes affirmed the commitment of the Office of Head Start to engage in meaningful consultations with American Indian and Alaska Natives governments, the development of clear priorities for moving forward and supporting AI/AN grantees, and incorporating Tribal Head Start programs into the *Head Start Roadmap to Excellence*.

Discussion/Comments of AI/AN and OHS Participants

A. Federal Responsiveness – AI/AN Comments

- Be more responsive with Region XI. Have an advisory board for Tribal; Wisconsin Indian Education Association would like to be involved in that process. Align Indian Education programs. It can it be a separate program and be part of Interior, BIA, or some other subset. For Tribal Head Start programs, there is miscommunication about what HS is. The trainers preach the other model, not the tribal model.

- Tribal model is sovereignty based on language; local determination on eligibility; that's the main difference. Children are forced to go out of our community.

Federal Responsiveness – OHS Response

- Program specialists need regular contact with grantees; once a week. OHS is addressing the grants management piece, as well as new staff. Specific issues about your program specialist can be addressed with Director Sanchez Fuentes.
- Some pieces are legislative. OHS does not lobby or advocate as members of the Administration. Determination is a legislative piece; Tribal leadership needs to get involved. HS will be reauthorized in 2013; it's time for tribal leadership across the country to figure out what they want to fight for in the next reauthorization.

B. Fellowships – AI/AN Comments

- Can there be fellowships on policy and rulemaking? Can a few fellowships be set up for AI/AN?

Fellowships – OHS Response

- We have a national HS Fellowships program. Every year there is someone from the tribal communities. It depends on who applies.

C. Counting Families – AI/AN Comments

- Treat student and parent as same... Right now OHS counts the "unit" as the student, but we're advocating for counting child/parent as one unit. Programming has a piece for the child and a piece for the parent.

D. Plan for Consultation and Collaboration – AI/AN Comments

- What's the plan for consultation vs. collaboration? What's the timeline for implementation over last year? All issues were hit upon. Is each one given a timeline? Will someone provide updates on the Website? Or will we have no response?

Plan for Consultation and Collaboration – OHS Response

- OHS established a small tribal workgroup with only 8 members geographically representing the country. They recommended that when these consultations come to an end, OHS select four priorities to act on. The report in 2008 had a lot of challenges. OHS does not have the capacity to address every one of those. In collaboration with the Tribes, OHS wants to focus it down. One that came up in San Diego was facilities. OHS has gone back and tried to think about it. Also, another issue was professional development/teachers because of the 2007 Act. Legislative issues are out of our control.

E. Shared Governance – AI/AN Comments

- Regarding shared governance, it took a long time for tribal government to have nothing to do with hiring, which is very good. Tribal Preference Policy is one of our policies. Parent Policy Council picks nontribal members in their hiring process when there are qualified tribal members for the position. They want to hire the PhD. That undermines our policy. Our director says we've got to fill this position. But we're

head-butting in the Policy Council. It happened three times in one year. I'd rather have the personnel committee do that; that's what they're trained for (not parent council). Once you want to overturn their decision, it becomes adversarial. We want shared governance.

- Policy Council members are elected. If only we could appoint the PC.

Shared Governance – OHS Response

- The Act states who needs to be on PC (parents, community members), but Tribes can develop their own policies and procedures. You can add to the law.
- This is an internal issue depending on your HS policies. OHS wants Tribes to handle who will get hired, but we have seen HS programs be burdened by this. Under the Act, it talks about shared responsibility. Now is the time to go back and look at your tribal policies and see how they are. The Act has more guidance about the board... you may have old processes in place. OHS can help you with that. This is an area that will be discussed in revised PPS (shared governance), so it's critical that you respond.
- How does the Policy Council get trained? Should there be a "how do we do it listserv"?
- It's important to note that even if your Policy Council (PC) changes, if your HS policies and procedures are outlined, your PC will have to abide by that. It should be in writing. The tribal government can decide to make the structure more permanent and make it part of our HS policies and procedures to match PC bylaws. If the Tribe is the grantee, the Tribe should determine that when HS policies change, it shouldn't matter who your PC is.
- You could say our Policy Council will include two appointed members from the center. The governing body decides the composition of the Policy Council (i.e. whether centers are appointed).

F. Risk Management – AI/AN Comments

- It would be useful to know who is on the call; also to give handouts prior to the consultations.
- It's feast or famine. Unrealistic deadlines; big push again. I walked out of an RMM call feeling that I'd been handed my head on a platter.

G. Leadership and Staff Retention -- AI/AN Comments

- On a yearly basis we lose 45% of our directors in Indian Country. I've encouraged a mentor program be set up. We were told there would be training for Tribal Leadership around HS standards; the lack of understanding in governments on what they do when they sign the grant. There should be some kind of mandated training that gets 153 grantees together and how the Federal and Tribal governments need to act and interact. There's a big divide sometimes.

H. Mental Health – AI/AN Comments

- Services are required, but what is the Federal government looking for? Are you expecting outcomes? Is there a direction you need to go? MH services are extremely important. Why are we hiring people with a degree in social work?

Mental Health – OHS Response

- Our job is to assist Tribes in developing a broad brush MH program.

I. Competition for Expansion Funds – AI/AN Comments

- NISHDA brought it to OHS. Now we have to compete for that money. Why do we have to compete for money brought to Tribes?
- Competition for expansion dollars was a harried experience. I wrote five grants at one time. I'd like for us to get together and push for expansion dollars, especially for children who are over-income. They benefit from HS.

J. Teacher Credentials/Compensation – AI/AN Comments

- We are on track for 100 percent but at high cost to language/culture; we're cobbling something together; there's one pot of money, but maybe for Tribal HS could we get a dispensation that 25% of our staff get an alternate route if they are documented language speakers or native to the area. We don't propose backtracking on the degree, but what else can we pursue for Native language immersion in PPS? We've are 3-7 years down the road from getting people.
- We're ½ mile from a K-12 that would love a Native teacher with a BA. Because this is an unfunded mandate, we could say we're closing a classroom.
- 15% of your budget is supposed to be for administrative. Teachers fall into direct cost. Our Tribe pays 65% of PDM budget. HS is essential for Native American children. Unfunded mandates are one way of getting rid of a program.
- Everyone agrees education is important. First Nation children are suffering.
- When teachers go for classes, we have to hire a sub for them. Tribe funds that, not HS. We can afford it but it's a crisis.

Teacher Credentials/Compensation – OHS Response

- We don't disagree; we know it's a struggle. It is a mandate, but it was never our intent for programs to fire people with "lifelong experience." We want to see that staff are on an active plan. The language piece is huge. As you think about your staff, keep moving them forward.
- Staff compensation is a local decision. Address quality vs. quantity. That choice may mean closing a classroom. In communities where we shut down a classroom, you break trust with that community. But at some point you have to make a choice about how many kids and at what quality.
- We've had Tribes who justified reducing their enrollment while keeping their funding. That's an advocacy issue.
- Every grantee needs to pay attention to the associate degree.
- Look at your program design to see what options you can create for staffing.

I. Non Federal Match Requirements – AI/AN Comments

- Why is the non-Federal share included in 15% administrative cap?
- When salaries go up, it's administrative. We waive indirect cost for HS grants; so Tribe is picking up those costs. But that's not Federal share. There's an expense to operate a grant. We're exceeding the 15% by funding indirect costs.

- We have a hard time coming up with non-Federal share. If we could use indirect costs we'd have no problems. That puts more of a burden on the management of HS.

Non Federal Match Requirements – OHS Response

- Administrative cap is placed on entire budget (Federal and non-Federal share). The developers felt most of the funds should go to direct services to children.
- There is a waiver you can apply for.

J. Language and Culture – AI/AN Comments

- Language/culture preservation starts in early childhood.
- But that will be a finding in the Risk Management Meeting (RMM). At what point do findings become a deficiency when you're talking about re-competition?
- The goal is we want this program to work. But there's a fear in Indian Country.

Language and Culture – OHS Response

- The Head Start Program Performance Standards should add more flexibility. If the priority of the Tribe is to have a native individual in the classroom, just tell us why and how that person will get to the mandate at the time. We're moving into a direction of: it's your program, tell us how it works. We know there are Tribes across this country that were going to lose their language except for the HS mandate. So some things really work. If you can justify it to us, we will help support it.
- We're not going to shut down a program for that. In the next couple of months, you'll see more findings. We don't want programs to fire people who've been there 10 years.
- OHS believes in culture/language as a best practice. We will support you, but it's up to Tribes how they want to do it. There's no dedicated pot of money, but if Indian Country says we want a pot of money.... We fund multiple initiatives. We might choose that instead of Tribal colleges. We can make those choices.

K. Program Performance Standards – AI/AN Comments

- It's good to know there will be flexibility in new PPS. What happens in 2013?
- Tribal leadership should be in the driver's seat.

Program Performance Standards – OHS Response

- Eventually revised Head Start Program Performance Standards will go out for public comment. That will be an opportunity for Tribes to send comments.
- Tribal leadership will need to go to Washington, D.C., to say this is what we need for 2013. Congress sets the law. That's where you have to start to make changes.
- This is Federal money. AI/AN and Migrant are one aspect of HS. They're looking at all low-income children. It's an advocacy piece. HS and EHS are in the same Act. But with the PPS, we're still in the process of determining what is best; you tell us. Tell me who are good people who will work on the big picture for Indian country and not just their own Tribe. PPS should reflect best practices for ALL of Indian country. It's a huge job to make it specific enough so it covers everyone but flexible enough.

L. CLASS – AI/AN Comments

- CLASS is a judgment. When will there be re-competition? CLASS should be with the spirit of helping.

CLASS – OHS Response

- Tribes will receive information about specific training for teachers. Use CLASS for professional development tool.

M. Monitoring – AI/AN Comments

- Performance Standard mandates can make us frantic.

Monitoring – OHS Response

- The message is about helping. Those findings are not just a reflection on the grantees, it's a reflection on OHS. I hope as you move into the new monitoring system, you're there to support it. What does the program need? Then T/TA system can move in.
- I'd like to see a plan that shows how things will be more efficient. Give me a plan that will save money that will go to our programs.
- Monitoring is looking at the systems. If we find that you're not doing anything about it. Monitoring looks at systems and big picture.

N. Head Start Expansion – AI/AN Comments

- We'd love to convert some of our home-based slots to center-based, but we need facility money for space.
- I consider HS a necessity. It should be for neediest children in community. On top of that are you going to add criteria? We could have asked to not make those changes?
- I would suggest that it be awarded to programs that have existing services. You need the infrastructure. EHS is a new animal. To give the program the nurturing it needs.
- We broke ground on our building. Process was scary.

Head Start Expansion – OHS Response

- How would Tribes like to see the money distributed? Funding is capped at \$50M (five years); then it will go into regular appropriations formula. The 2011 budget allows for \$10M. It's only for direct services and for Indian Head Start. Until the budget is approved the \$10M doesn't exist. When we recapture for any Tribal program it goes back to Tribal country. We always work with the grantee to make sure it stays with the Tribe. The money is allocated for 2010; should every program get a piece (10M/153 programs); if competitive, it's open to new HS programs. Expansion is for adding additional slots; expansion can also be for additional hours or days; converting pre-k slots to Indian slots.
- You have flexibility in OHS budget to spend on transportation so you can respond to community needs; i.e. When someone designed your program, they should have taken into account all those costs. You'll have to look at reworking program design and whether your program is realistic.... That's where local programs have to make choices.
- If you're within the constraints of the law, you can ask us. You should always ask. Push back a little too. You are in charge of operating the program. Those of us in support capacity understand that you know your local community better than we ever

will. You need to have those conversations. If you're looking to do something different, if you know three months out, you should have a conversation early with your program/grant specialist. When programs were initially funded, organizations said they'd serve X children for X dollars. Over the years the cost for child may change. You have to resubmit for your grant and say there's a huge change in my community and I'm increasing my cost per child. When you submit for refunding you should say I need to make changes for my budget. It varies by program.

- OHS doesn't offer grant training; it's inappropriate. But United Way in most communities has terrific training in communities and how to apply for funding. Maybe the new national center can do training around grant applications.
- NISHDA could help. There are rules around fundraising. You can't use the center as a way to raise money. You can't use HS facilities and staff time for fundraising activities. If staff wants to volunteer or if they are using facilities -- not on government nickel or time.
- We are doing regular check-ins. Use your money efficiently. We want to help you to put that money out so you can serve families as quickly as you can. It's never our intent to threaten you. In your monthly report, put in comments. T/TA allocations should be more than sufficient; do a budget revision.

O. Wrap up – AI/AN Comments

- Can OHS identify content that could be provided online?
- You're the best hope we've had in 10 years. It's very important for us to know there is someone who will say I will listen. You're the best hope that I've seen.

Wrap up -- OHS Response

- Participants will receive an email in the next two weeks regarding the T/TA system.
- If you have a concern with a program specialist, contact the OHS Director.
- OHS has asked NISHDA to do a survey of tribal concerns since OHS cannot gather information from grantees directly.

The Office of Head Start Tribal Consultation: Tulsa Oklahoma, July 30, 2010

Participants

Office of Head Start: Yvette Sanchez Fuentes, Director Office of Head Start (via conference call); Renee Perthuis, Director OHS Division of Program Operations; Cynthia Walker, OHS Senior Program Specialist; Trevondia Boykin, OHS Program Specialist; Susan Johnston, Program Manager, Region VI.

Tribal leaders or their representatives: (See Appendix for detailed listing)

In addition to OHS representatives and tribal leaders and their representatives, the President of the National Indian Head Start Directors Association, Danny Wells, participated in the consultation.

Introductory Remarks

The Director of the Office of Head Start, Yvette Sanchez Fuentes, made introductory remarks via conference call. Director Sanchez Fuentes affirmed the goal/intent of the Tribal Consultation was to improve communication and relationships with tribal Head Start and Early Head Start grantees and for OHS to move forward in determining how to support Tribal HS programs informed by tribal concerns and interests.

Discussion/Comments of AI/AN and OHS Participants

A. Non-Federal Match and Waivers – AI/AN Comments

- Suggestion to lower NFS from 20% to 10% for in-kind.
- Five percent is much more manageable. Programs must balance their overall budget, not just HS budget. Just like Federal and state government, Tribal-generated dollars are not as plentiful as they used to be.
- Our small program could not meet NFS this year. Our community has 6,000 people. Businesses are closing. We were hit by a tornado. Our HS program is not supported by a Tribe. We're struggling. It's going to be years before our small town will recover from all of this, and it was already in economic downturn.
- Without OHS support, any legislative effort to lower NFS begins to fail.
- OHS has a track record now of this request and hopefully, it would be emphasized as you are queried by Congress. Maybe OHS can put that on Congress' agenda so OHS doesn't have to wait to be asked about it. OHS represents the Federal government but you also represent us. We need you to be advocates for us to the legislators that this is a problem. I don't know if we've [Tribes] have ever gone to Congress about in-kind before.
- Waiver is a short-term solution. Even if it's legislative, the long-term/permanent solution is to reduce NFS to compensate for the loss in what is allowable. Realistically that should be 5-10 percent. Many small Tribes struggle to meet 20 percent.

- Waiver requests can take a long time for response/approval.
- If a grantee doesn't make their in-kind, they get a monitoring finding. Programs don't understand that before the application is submitted, the NSF budget has to be realistic – based on what is going on in the community. Many new directors do not understand that this can really get you in trouble. The consequences are not advertised. This is problematic in Indian country where HS directors turnover is 30-40% every year.
- This is a communication problem because when you talk to your grants specialist, they tell you the opposite – turn in the waiver with your application.
- It seems natural that if your grant application is approved, then your waiver is approved – if they are submitted together. Sometimes we don't get a letter about our waiver request so we don't know if NSF waiver is approved.
- Suggestion to include in the grant application package, a sheet that discusses 1) what you must pay back if you don't make the match; 2) importance of the NSF budget; 3) making the NFS budget realistic and attainable; and 4) a clause that after you figure your budget and think you can't meet your NSF, to request a waiver.
- If a Tribe doesn't pay it back, they can lose their grant. A few Tribes try to negotiate, but every day the interest goes up. In one case, it went from \$40,000 to \$100,000.
- What is the history for why transportation was disallowed as in-kind? We suffered by \$250,000 when that was disallowed. Can that be reinstated?

Non-Federal Match and Waivers – OHS Response

- Going into the second year of American Recovery and Reinvestment Act (ARRA) funding, OHS will examine how grantees were able to meet their NFS.
- Many years ago, all Native American grantees had a built-in continuous waiver. Some had zero in-kind. That tended to keep Tribal grantees out of difficulty and allowed flexibility. Communities still needed to make a good faith effort to bring in community-based support. We know Congress doesn't want to change this.
- It is a fiscal impact for the Federal government to eliminate or reduce NFS. Congress consults with OHS about impact, but OHS can't offer opinion.
- OHS is streamlining the waiver process. Currently, the process involves: 1) submission from the program; 2) discussion between program specialist and grants specialist; 3) review by the Regional Program Manager (RPM); and 4) review in the Central Office by Renee Perthuis and Director Sanchez Fuentes. Waivers are almost never rejected by the Central Office because Regional Office has done due diligence. Signature authorities are delegated down from the Secretary to the Assistant Secretary to the OHS Director, etc. Delegation of signature authority down to the Regional level may speed up the approval process.
- Each region is different. Proportionally, the South has many more requests than Denver. Region V has no waivers except in Detroit. Of 26 MSHS grantees, 93-94% request waivers. By its nature, MSHS has difficulty making community connections.
- Most RPMs don't want to grant a waiver at the beginning of funding year because they want programs try to generate that NFS and then let the Regional Office know if they can't meet it.
- If the waiver letter is not part of Financial Assistance Award (FAA), then waiver is not approved. Renee Perthuis asked if Tribes would be interested in NFS via a "maintenance of effort," meaning that in the first year, you reach a certain percentage

of NFS, then in subsequent years that is what you must strive for. [There is no response from participants.]

- The change to disallow parent transportation to meet NFS came from the National Transportation Safety Board's (NTSB) review of allowable vehicles for transportation. When NTSB said that was no longer allowable, OHS had to take that away as NFS.

B. Class size Waivers – AI/AN Comments

- What is the process for a class size waiver? I want to have a 3-yr-old classroom with more than 17 children. I have facilities and staff. Everything that I've tried has been turned down and now I'm "under-enrolled" because I don't have enough 4-yr-olds. I just don't have the number of 4-yr-olds in my community because they all go into public school (pre-k). Why do we stick with 17 maximum for 3-yr-olds? Oklahoma allows us have 20 3-yr-olds; OHS allows 17. I've applied for expansion but was denied. I do not have money to hire additional staff. Local public school does not want to collaborate with the Tribe. Where do I go other than trying to do everybody else's work? I've done all the paperwork. My program specialist should know I've done all this stuff. I keep getting the same requests; it's redundant. If I had 22 4-yr olds I'd be fully enrolled. But now I've got predominantly 3 yr olds, with 14 on the wait list.

Class size Waivers – OHS Response

- We will check on the issue of class size waivers. Waiver requests that had service implications go through Amanda Bryans in the OHS.

C. Enrollment Reductions – AI/AN Comments

- How long does it take to get approval for reduction of children and not money? One grantee took over six months. In those six months, you are found under-enrolled and noncompliant.
- Oklahoma has had pre-k for 12 years, and reviewers didn't understand we had competition for 4-yr-olds. Now that's changing.

Enrollment Reductions – OHS response

- If you have a waiver in place and it's truly taking long to process, it's not a monitoring finding as long as you don't submit the waiver just before monitoring.
- The HS Act says that if you are under-enrolled 4 consecutive months your program must have a plan and timetable to reduce or eliminate underenrollment. At the end of one year under this plan, we will determine if the program is chronically under-enrolled (less than 97% fully enrolled). One option for agencies, under some circumstances, is to ask for an enrollment reduction and keep the funding.

D. Improvement of Business Processes – AI/AN Comments

- Our FAAs are always late. Those of us with tribal funding can make it, but those who don't can't. After 14 years of HS, only once have we received funding prior to the start of the year.

- Can we get two FAAs – One sent to tribal administration and another to the HS director?

Improvement of Business Processes – OHS Response

- FAAs are supposed to arrive 30 days in advance. Second half of funding is driven by appropriations.
- Process is: Application is submitted 6 months prior to start of new year. Original goes to program specialist; copy goes to fiscal specialist simultaneously. They are to begin protocol immediately and have a coordinated voice. It is required to have the grant in the system 30 days prior to new year.
- OHS will contact the Office of Grants Management to see if the program specialist can automatically receive a copy of the FAA that can be faxed to the Head Start program.

E. Federal Staff Turnover – AI/AN Comments

- It's a revolving door for program and grants specialists.
- We were not able to reach our grants specialist from December to February when we had our Risk Management Meeting (RMM). At the RMM, we received the agenda which listed a grants specialist we did not know.

Federal Staff Turnover – OHS Response

- One reason for turnover is contract staff leave. Some Regions, such as RO IV, are very heavily contract staff.
- OHS will have OHS staff institute a tracking system.
- Two weeks ago, OHS instituted a procedure to use Out of Office email and voicemail to let others know who to contact as a back-up when the program specialist is out of the office. AI/AN has 10 Federal program specialists and 10 contractors. Now new program specialists must introduce themselves to their grantees and consult with the previous program specialist to understand the issues. For the refunding process, the new process is 25 days with the program specialist and 5 days with the Program Manager for the AI/AN program branch.

F. Refunding Applications – AI/AN Comments

- A number of grantees are not receiving instructions for writing their funding application in their packet. This can be difficult for new directors.
- Due to high turnover, directors need to be reminded that instructions are on ECLKC.
- For the continuation grant instruction, part of it is listed under full grant. Instructions are not laid out properly.

Refunding Applications – OHS Response

- The refunding letter does reference Program Instruction (PI) from 2000. This needs to be updated.

G. Designation Renewal – AI/AN Comments

- What is the status of the 5-year cycle for re-designation?

Designation Renewal – OHS Response

- It has to go through regulation. OHS has received feedback from OMB and has another internal iteration to incorporate OMB feedback. The proposed system for designation renewal will go out as an Notice of Proposed Rulemaking. It will not be final until 2011.

H. Grants Management Office – AI/AN Comments

- Grants specialist and program specialist should have common training.

Grants Management Office – OHS Response

- This year, there was joint training on fiscal for all fiscal/program specialists. OHS is undergoing a reorganization and will add a grants and contract Division that will be another conduit for communication.

I. Under enrollment Plan – AI/AN Comments

- I try to pre-empt being under-enrolled. We couldn't support 10 pregnancy slots so I asked for a program option, converting some slots to home-based. But before we could implement it, our center was struck by a tornado. We received a letter saying we must do a plan of prevention to address under-enrollment. Does no one know we suffered this disaster? Is there no recourse other than to do all this paperwork? That's preventing us from moving forward with the home-based program.
- OHS has all of my information from my community assessment. Why am I doing double duty again? All along we have communicated with our specialist. And now we're getting another request for another plan.

Under enrollment Plan – OHS Response

- Along with a 5-page form, the program specialist develops a plan. Prior to that, the specialist will call program to work on the plan. Programs are required to send additional information and participate in conference calls to work with program specialist to eliminate under enrollment. You are required to update your community assessment annually. We don't want to bog you down with paperwork, but we still need to ask because if any changes have occurred in your service area, we don't know.
- Responsibility to develop plan is with OHS. But we don't want it to be a process where we are taking over operations of your program. It does need to be in conjunction with HS program.

J. Teacher Qualifications – AI/AN Comments

- Higher requirements for teaching staff. Money is available for T/TA but Tribes would like that amount increased to meet this requirement. Concern is priority of staff qualification. We might be told we can't get services out of ICF (AI/AN T/TA contractor) and have to spend our own money to bring in T/TA.
- We defeat purpose of the T/TA program if we have to spend our own money to get help.

- We have to work harder to get people with qualifications for infant/toddler. Some staff have to travel out of town for training; it's very costly. T/TA money doesn't stretch nearly as far as it needs to.

K. Restructuring of T/TA – AI/AN Comments

- Percentage for T/TA should be divided differently.
- Participants ask about rumors of restructuring the T/TA network for AI/AN. Rumor is that GPSS will now be called GS (grantee specialists) and will not be assigned to a specific area. They will be assigned at request of the program specialist and assigned to a grantee until the issue is cleared.
- GPSSs will no longer be specifically assigned grantees. This is of concern because the relationship that's been built by the GPSSs with their grantees is based on trust.
- There is concern that tribal programs will lose their assigned specialist for a length of time while he/she is temporarily assigned to another program. Also there is concern that a tribal program that needs targeted T/TA may be sent a grantee specialist who may not understand tribal Head Start.
- You may get rid of the deficiency, but if you have a drastic issue that is there for years, there is no way an individual coming in for a few weeks will get rid of it.
- Where is the change coming from? There was no input from the tribal system, even though the Head Start Act requires input.

Restructuring of T/TA – OHS Response

- T/TA will be driven by the six national centers. For deficient Head Start programs that need more T/TA, a specialist may go to the center for a while. Everyone will still have an assigned person. If a program is deficient in one area, a national center could identify a grantee specialist who specializes in that area and send that individual to the program for targeted T/TA (if this is an area that the regularly assigned grantee specialist does not specialize in).
- OHS agreed to change GPSS to “grantee specialist”

L. Risk Management – AI/AN Comments

- Indian Health Services (IHS) should continue to be on the RMM calls because there are health issues. Tribes rely heavily on IHS for health services; they also rely heavily on GPSSs. GPSSs should continue to be included in RMM calls because they're the ones who help Tribes address issues.

Risk Management – OHS Response

- Director Sanchez Fuentes is committed to those parties in RMM. OHS is concerned about the rumors that T/TA is being taken out of RMM.

M. Centers of Excellence – AI/AN Comments

- How will National Centers serve grantees?

Centers of Excellence – OHS Response

- We are to depend on Centers of Excellence, but they have not selected. It usually takes 2 years for new centers to get up and going. This could mean a gap in T/TA for another 3 years.

N. Rumored List of Deficient Programs – AI/AN Comments

- There is a rumor that there is a “hit list” of 6-8 grantees that may be re-competed and replaced.

Rumored List of Deficient Programs – OHS Response

- There is no list. There are grantees that need more assistance than others. Many have been contacted; OHS has begun working with them. They know what their deficiencies are based on their triennial review. The plan is to assist those grantees that need more T/TA, not to eliminate anyone.
- Program Performance Standards are a minimum. There are some grantees that do not have the capacity to meet the minimum. If after receiving T/TA, they still don't have capacity, they should not be providing services to children and families. These grantees would not be surprised they are considered in the lower quadrant.

O. Teacher Compensation – AI/AN Comments

- We appreciate the funding made available to help our staff get degrees, but along with that comes an increase in salary. When they get their degree, they'll leave for public schools. We request that when requirements increase, there should be appropriations money to pay staff what they deserve.
- Cost for child in Early Head Start (EHS) is higher than Head Start and appropriations should reflect that.
- Understanding that OHS cannot advocate, Tribal programs expect OHS to “educate” Congress so that when Tribes go to the Hill, Congress is already aware of issues.

Teacher Compensation – OHS Response

- This is one of those legislative things.

P. Cost-Of-Living (COLA) – AI/AN Comments

- One program, affiliated with a university, applied for COLA in order to remain competitive. An issue arose when HS assumed the program pays 30% for fringe, but the university requires 37-40% fringe. The program was forced to make up the difference by transferring money from its supply budget.
- Many grantees that can't afford COLA don't apply for it, and would lose increase in base funding. There's a clause that allows programs to apply for “other than salary and fringe.” That needs to be explained more clearly because there are some Tribes that do not allow programs to give COLA (because they would then have to give COLA to tribal non-Head Start staff). They end up losing money because they didn't apply since they didn't know about the clause.
- Programs don't know they can negotiate a grant for the percentage of COLA.

Cost-Of-Living (COLA) – OHS Response

- OHS will work on explaining this matter in its letters to programs.

Q. Revised Performance Standards – AI/AN Comments

- Has there been consideration about separating EHS standards from Head Start standards? Some standards are intertwined, but there could be a separate section for EHS.

Revised Performance Standards – OHS Response

- If OHS receives public comment indicating that this is what the community wants, it could be considered.

R. Unannounced Visits – AI/AN Comments

- It is suggested that Director Sanchez Fuentes contact governor/chief/chairman in advance.

S. Delayed ARRA Expenditures – AI/AN Comments

- Environmental factors; we had to delay construction on some storm shelters because of heavy rains. That is one of the issues that delay things.

Delayed ARRA Expenditures – OHS Response

- GAO has asked for data dumps from the GATES accounting system. They're really perplexed why the ARRA money is not flowing out faster. OHS has explained that we have licensing and criminal background checks, etc., and may need to go back to Federal Register. There are also construction delays.
- Some programs have the ability to use other funding to pay for construction until Head Start reimburses them. Thanks to programs and RO staff, OHS was able to educate the Vice President's office that it's not just funding to the states.

T. Enterprise System – AI/AN Comments

- Director Sanchez Fuentes mentioned in San Diego that someone is working on database system that could be made available to programs to save money and can be merged with Enterprise system as year progresses. Is that still in the works?

Enterprise System – OHS Response

- Contract for Enterprise is nearing the end and will need to be re-competed and modifications will likely go in new proposal.

U. Research – AI/AN Comments

- Will there be continued funding for research projects for RO XI. There is little current research that references AI/AN. There are some projects with the universities of Colorado, Mississippi, and Oklahoma. How can we continue that for childhood obesity, language, and culture? HS Act talks about studies for funding allocation, curriculum. The major one was determining number of eligible kids, and one on facilities. The facilities report looks at conditions and how programs can more appropriately serve children. It's broad. It does not indicate priorities.

Research – OHS Response

- If programs have research ideas, please communicate them directly to us or through one of the Tribal national or regional associations.

V. Facilities – AI/AN Comments

- Every year, NIHSDA is approached by leadership about old buildings. We suggest working together to provide OHS with inventory of facilities, age, condition that OHS can share with legislators.

Facilities – IHS and OHS Response

- (IHS) An ESurvey system tracks facilities. Since 2003, if a program completes and enters their survey, that information is tracked. Data can't be accessed by everyone because of confidentiality. It includes sanitation, utility, functional design and structure, accessibility, HVAC, lighting, chemicals, outdoor, environmental. NIHSDA can contact IHS directly for information. Because ESurvey is not required, there are areas without information, including California.
- Will ask IHS if this information (minus confidential information) can be shared electronically with OHS.

W. Grants Management Office – AI/AN Comments

- Why is there no participation from the Grants Management Office in tribal consultations?

Grants Management Office – OHS Response

- The lack of participation from the Grants Management Office is not due to any lack of importance, but is due to work needed to close out for the fiscal year.
- OHS will look into the Grants Management Office participating in future consultations via teleconference.

X. Waiver Authority – AI/AN Comments

- How many signatures are required from OHS to get a waiver?
- We don't want repercussions on our program specialists unless it's deserved.

Waiver Authority – OHS Response

- OHS is working to streamline this process to get responses out more quickly. In the process of considering waiver requests, OHS is informed by real world examples of the challenges faced by grantees.

Y. Expansion Funding – AI/AN Comments

- National Indian Head Start Directors Association (NIHSDA): We want to be clear that it's more than adding slots because we lost some ground in some programs by letting staff go. For us, expansion means coming back to where we were before. We are also concerned about division of grants equitably. In San Diego, Director Sanchez Fuentes said some grantees are not deserving because they have gotten money and did not do well. We know who they are and can exclude them. Tell them they are not

high quality programs. We need an equitable way to disburse the money because only 3 out of 153 got ARRA money. Only 17 applied because it was such a short turnaround. Put some thought into an equitable way to disburse the \$10M for programs.

- We were allowed 150 pages maximum, but were also required to submit a full audit. Ours is 70 pages, we would've been thrown out because we would exceed 60 pages for that section.
- \$10M was originally offered for adding slots. The 2nd time it was advertised, it included expansion of part to full day. This time will it include adding slots only?

Expansion Funding – OHS Response

- If you know it's coming, why wouldn't you start preparing your grant application? For the next round, if NISHDA can demonstrate a bias or weaknesses, it can be corrected. When the panel asks for more information, that's not unreasonable since they may not be familiar with your program.
- If we could get Top 10 things you would change about the process that would be more effective.

Z. Indian Health Service – AI/AN Comments

- NIHSDA: Regarding reports that Director Sanchez Fuentes receives from IHS, any criticism on health services is not about IHS Head Start. They are valuable. We rely on them for a lot of services and information. We want OHS to know we want to keep IHS.

AA. Culture and Language – AI/AN Comments

- There are a number of grantees with native speakers who are teachers and could be losing them because they are not going to be able to get CDAs, etc.

The Office of Head Start Tribal Consultation: Rapid City South Dakota, August 27, 2010

Participants

Office of Head Start: Amanda Bryans, Director OHS Division of Educational Development and Partnerships; Donald Wyatt, OHS Senior Program Specialist; Ross Weaver, Program Manager, Region VIII, Clarence Small, Program Specialist, Region VII. *Indian Health Service:* Robert Bialas, Early Childhood Health and Safety Specialist. *Administration for Children and Families:* Moushami Beltangady, Special Assistant.

Tribal leaders or their representatives: (See Appendix for detailed listing)

Introductory Remarks

The Tribal Consultation Session began with Amanda Bryans extending Yvette Sanchez Fuentes' regrets for not being about to attend in person. She also affirmed Director Sanchez Fuentes' goal for tribal consultations to improve communication and relationships with AI/AN grantees and to support programs in providing improved services to Native children and families. In particular, the OHS is interested in hearing the concerns of tribal representatives and will be responsive to issues within the control of the OHS.

Discussion/Comments of AI/AN and OHS Participants

A. Streamlining the Consultation Process – AI/AN Comments

- Tribes are asked to attend too many consultations. Federal agencies should standardize and coordinate their consultation requests.

Streamlining the Consultation Process – OHS Response

- We apologize; OHS is working within ACF to coordinate. Trying to fulfill our responsibility without burdening Tribes and their budgets, i.e., this consultation was held in association with the annual Northwest Indian Head Start Coalition Conference meeting.

B. Changes to T/TA System – AI/AN Comments

- Tribes received Director Sanchez Fuentes' letter in August and should have received a full rationale for such policy changes.
- The communication should anticipate/address how Tribes' operations may be impacted, and outline a process for addressing negative impacts.
- Tribal chairs are kings and queens in our country. You need to recognize them and involve them before you make decisions that impact our Nations.
- Tribes don't have a voice in changes like this.
- Concern that T/TA support will be more difficult just as Tribes are being considered for recompetition.

- Will Tribes be consulted on changes to T/TA? Need help around children's health issues (diabetes) and bringing divided families together in support of children.
- Would like a smoother transition between HS programs and T/TA provider so we're not left questioning. The T/TA provider in the state, are they going to know about tribal programs?
- You said high-risk programs have to reapply. How do we enhance these programs? Let's not penalize them when the Program Specialists (PS) can't help them get T/TA.

Changes to T/TA System – OHS Response

- It's not fair that it got changed mid-course and you didn't have an opportunity to provide input. I can only say that the T/TA system has been a work in progress. The only onsite T/TA will be for programs already identified as high-need.
- The current T/TA contract will not be recompeted at this time but there will be content specialists for geographic areas. When there's a new specialist, the Tribe should hear from the T/TA office.
- T/TA providers have always been required to have experience. There is a dedicated AI/AN T/TA provider. Again, T/TA is a work in progress.
- The idea for recompetition was not from OHS, it was a law passed by Congress. There are programs that we've funded 45 years that aren't providing good services. \$8.1 billion for a million kids isn't anything to sneeze at. When the rule comes out about how it will work, you need to get on top of the situation as soon as you can.

C. Income Eligibility – AI/AN Comments

- A "hugely frustrating" issue for Tribes.

Income Eligibility – OHS Response

- Tribes can enroll up to 49% of children who are over-income. We have created more flexibility through our regulations.

D. Teacher Retention – AI/AN Comments

- We have to enforce higher standards for our teachers but we don't have the funds for salary increases. How do we keep teachers from leaving HS?
- Our program staff lost health care because our casinos are losing revenue. Can OHS help? That's one reason staff join the public school.

Teacher Retention – OHS Response

- Every program must have a plan; staff background in child development increases the program's chance for success.
- HS teacher turnover is relatively low, according to OHS nationwide analysis. (AI/AN commenter suggested that's not true in AI/AN.) COLA (cost-of-living allowance) was just provided for first time in eight years. OHS will try for future COLA.
- HS has always helped parents get back to school; that's one reason for turnover. Ask staff you're supporting to stay for some period. Do exit interviews. Are they leaving for more money or are there other factors you can fix?
- Staff may be less likely to stay without health care; maybe a national system will help? If not, you need a strategic plan. Consider a health care buying cooperative for

human service providers. When we do the COLA there's some money for fringe benefits. It's the second largest expense for any program. Look at your cost per child; should you cut enrollment? That's a devastating conclusion but it's also devastating if you have to lose staff.

E. Teacher Training – AI/AN Comments

- Not enough local instructors (Oglala) for us to meet the training deadline.

Teacher Training – OHS Response

- Community colleges want students; you may find economies of scale by working with non-tribal HS programs.
- Check ECLKC for online training; OHS will sponsor an infant/toddler AA degree online. Some areas don't have broadband; OHS had supported a CDA program in Alaska; we may need to consider similar programs.

F. Risk Management – AI/AN Comments

- Would help to get RMM reports quickly and not several months later.

Risk Management Meetings (RMM) – OHS Response

- Review reports have a timeline and shouldn't be late.

G. PIR – AI/AN Comments

- There's a lack of definitions; it's confusing and we need better guidance. For instance our data are in and I think our numbers could have been higher but I don't think we're allowed to change them after being submission. But I know that impacts RMM.

PIR – OHS Response

- There is a guide; it's lengthy and not always completely clear. PIR is tremendously important; it also helps us tell Congress about HS's impact.
- We did a study on PIR data reliability and found it's not very reliable at the local level. Clearly, questions are not clear. But the errors cancel out and the data are reliable at the national level.

H. Federal Staffing – AI/AN Comments

- We've had five Grant Specialists and three PS in a short period of time, each with different takes on procedures and policies.

Federal Staffing – OHS Response

- We apologize for the staff changes. There should not be changes in procedures when staff change. We're working on how PS are trained.
- One reason we have RMM is to improve accountability of Federal staff. It has been very useful for us to understand the skill level and expertise our specialists have.

I. Underenrollment and Service Areas – AI/AN Comments

- There have been negative experiences in explaining under-enrollment to OHS program and grants specialists.

- Some HS programs are “competing” out of their service areas with AI/AN grantees.
- If a pre-k is within Tribes’ boundaries, can a Tribal Council block them?

Underenrollment and Services Areas – OHS Response

- We don’t want to compete with pre-k, but HS addresses comprehensive needs that aren’t always met by other programs. Tribal leadership may need to think about program conversion.
- HS grantees have defined service areas in your grant; no other HS program should be competing. Early Head Start (EHS) is more complicated. Sometimes local grantees have agreements; but there should not be encroachment.
- As sovereign nations Tribes decide who operates on tribal land. We’d like to see cooperative arrangements so we’re serving as many children as possible.

J. Revised Performance Standards -- AI/AN Comments

- HS has moved away from helping children develop socially and emotionally.
- Caucasians talk about what is scientifically proven. But we know the drum’s vibration releases a chemical in the brain that has an effect on the human body. A study found that cradle-boarded children don’t die of SIDS. The bridge may be there so we can capitalize on our traditions.
- Could we do a mixed-age class? Might be a model in this area with our Lakota-speaking people, helping expose more children to Native languages.

Revised Performance Standards – OHS Response

- Standards haven’t changed in years, but they’re about to. They’ll be published as a proposed rule; there’s a tremendous opportunity to comment. Every comment has to be reviewed.

Draft is coming out; please comment. Review the regulations first and look back at the preamble to find the rationale. Comments will have tremendous influence. It will be worth the time to read it; maybe take staff on retreat to review and write comments.

K. Facilities – AI/AN Comments

- We have old facilities and want to build a 0-5 serving unit. Educare has approached us about partnering. The building may not be doable and brings huge training issue. We don’t want to disenfranchise our workers, who don’t have degrees. We could use help in evaluating the type of program we should have, and in educating the community and stakeholders.
- We have a facility with 40 students sharing one bathroom. No sprinkler system; you ask us to follow State/Fed regulations but we don’t have the money for changes.

Facilities – OHS Response

- Good to focus on birth-5 (or 8). Educare is nationally known. They follow the PPS and have had good outcomes so far. If someone’s approached you with foundation backing, it’s a wonderful thing.
- We recognize tremendous needs in facilities in AI/AN programs and we’ve invested whenever we can. Occasionally we’ve made one-time funds available. We do have

some funds left. We prioritize on health and safety issues. We can't fund all facilities, but you can use grant funds for loans; USDA has funds available.

L. Services for Children With Disabilities – AI/AN Comments

- HS is finding, screening, and advocating for special needs' kids but we're hitting a brick wall with public schools. We could use help. How do we get services on the reservation or coordination with the State?

M. Need for Printed Material – AI/AN Comments

- Some areas lack broadband; we need printed material from OHS. Without e-mail you can't apply for some things.

Need for Printed Material – OHS Response

- We have a printing prohibition. Some things (i.e. "Picturing America") won't work as a download.
- 100 % of HS grantees nationwide have connectivity but we make the mistake of thinking it's always accessible.

N. Designation Renewal – AI/AN Comments

- Who will do monitoring related to recompeting?

Designation Renewal – OHS Response

- OHS is not having the Office of Inspector General (OIG) do site visits. OIG did site visits of ARRA expansion grantees if they were absolutely new to HS.
- The investigative arm of the Government Accountability Office (GAO) found program staff who directed people not to report all income. About half the programs they visited were making mistakes. We're only meeting 50-60% of need for eligible kids, so to having a worker say "Don't show me that" income is devastating. As a result, we're doing some unannounced monitoring.
- You should know if you'll have to recompete your grant and should consider how to address it. It's important to get T/TA.

O. Communication – AI/AN Comments

- PS and grantees should check in once a week or a few times a month; form trust and a nice working relationship; depend on their feedback. Then we hear they've resigned; it's abrupt. We're all about giving continuity to families and children but the directors need it too. Where's our support?
- How many Indians are you recruiting? It would be advantageous to hire Indian PS.
- PS don't understand the conditions that Tribes deal with. We have nine districts and 11 towns; we're as big as some of your States out East, but we don't have the infrastructure. We're busy working with the State on an 18-month road construction project that's making travel unsafe for our buses, and creating a hardship for children. And our PS is calling, saying: "Why don't you...? Why can't you...?"

Communication – OHS Response

- We need to make every effort to have continuity and plan for transition. We know that relationships are important; no question is stupid.
- We've recruited in Indian newspapers, networked and asked PS to inform grantees. The Federal hiring system is cumbersome but there is an AI/AN hiring preference. Advice and names are welcome.
- Continuity with PS is more important because of changes in tribal leadership.
- HS can't meet the needs of the highest need families without transportation. We need visits to truly understand what it's like to be on those roads. Previously, PS could not travel. Director Sanchez Fuentes doesn't feel that way. We still don't have enough AI/AN PS; they also have to do monitoring visits of their colleagues' programs.

P. Non-Federal Match (in-kind) – AI/AN Comments

- It's very difficult to get parent in-kind. We're in an isolated area; the Tribe as a whole is already tapping into those available.

Non-Federal Match (in-kind) – OHS Response

- You can request a waiver and you'd easily get one I think. You can count parent volunteer hours at home, if they're doing things that support the curriculum and child outcomes; think about what you're getting even if parents can't get to the center.

Q. Success Stories – AI/AN Comments

- We had 240 students attend Cheyenne River and 104 graduated. That's one of the biggest events in our reservation. ... This year we had four teachers graduate from Oglala with their AA and six with CDA certification. One of our HS children went to screening and was identified as being deaf. She had a cochlear implant. She mainstreamed to HS and is now in first grade. We're very proud.

Success Stories – OHS Response

- That child's trajectory is changed forever. If you have stories, please submit them on the ECLKC. Director Sanchez Fuentes has a project about HS's lasting impact.

The Office of Head Start Tribal Consultation: Auburn Washington October 18, 2010

Participants

Office of Head Start: Yvette Sanchez Fuentes, Director Office of Head Start; Ann Linehan, Director OHS Division of Quality Assurance; Linda Brooker OHS Program Specialist; Cynthia Walker OHS Senior Program Specialist; Nancy Hutchins, Program Manager, Region X.

Tribal leaders or their representatives: (See Appendix for detailed listing)

Introductory Remarks

The Tribal Consultation Session began with opening remarks from Yvette Sanchez Fuentes. Director Sanchez Fuentes noted that Northwest Tribes were strong in supporting their Head Start programs and expressed how much she was looking forward to the input from the Northwest Tribes in this consultation.

Director Sanchez Fuentes introduced the *Head Start Roadmap to Excellence* and the four priorities from the *Roadmap* that will be implemented over the next two years. These priorities are: revision of the Head Start program performance standards, designation renewal (re-competition), family engagement, and redesign of the Training and Technical Assistance (T/TA) system including six National Centers.

Discussion/Comments of AI/AN and OHS Participants

A. Designation Renewal – AI/AN Comments

- Suggestion to rescind the notice in order to extend the timeline to allow for tribal input.
- Most Indian nations are impoverished. Lifestyle and culture are being taken away. The idea of recompetition is grating.
- Question: Does funding remain in the tribal portion?

Designation Renewal – OHS Response

- The regulations are proposed. Comments must be in writing.
- The regulations are part of the 2007 Head Start Act. The Secretary is required to do this.
- Another provider could be non-tribal, but tribal government has to approve, just like in relinquishment. The Federal Government doesn't consider this an adverse action. A Tribe may lose funding, but services don't go away.

B. Description of Proposed Designation Renewal Process – OHS

- There are seven conditions proposed to trigger competition for Head Start agency designation renewal related to quality, licensing, and fiscal and internal controls. The conditions are: one or more deficiencies, CLASS score, school readiness goals, license revocation, suspension, debarment, and a going concern or material weakness reflected in audit.
- Quality: Any grantee with one deficiency, even if subsequently corrected, is subject to competition for renewal of its designation as a Head Start agency. At third year of transition to designation renewal process we propose an average score of 3 across dimensions will trigger competition for designation renewal. If a grantee fails to establish school readiness goals, that will trigger competition for designation renewal. Guidance on school readiness goals will be forthcoming.
- Licensing: If a license is revoked, we propose that will trigger competition for designation renewal. If a grantee is suspended, we propose that will result in competition for designation renewal.
- Fiscal and internal controls: If a grantee is debarred from receiving funds from another Federal agency, we propose that grantee have to compete for renewal of its designation. Where the financial viability of the agency is in question, we propose the grantee have to compete to retain its designation as a Head Start agency.

Description of Proposed Designation Renewal Process – AI/AN Comments

- Regarding school readiness goals, is that with LEA or tribal Department of Education?
- The national movement is to transition into state systems, but does the U.S. Government recognize tribal education?
- What is current recompetition percentage?
- The Report given to the Secretary stated that at the low end, 15-20% of the grantees would be recompeted. I would encourage going back to 15%. The second point as I understand is we would have 1 year of T/TA, then wouldn't be recompeted after 1 year. We would put together an intensive T/TA plan and then be reviewed again. But, if it's a different deficiency, we don't get another year of T/TA.

Description of Proposed Designation Renewal Process – OHS Response

- We want to make sure kids are transitioning and ready to go into the school system. Proposed regulations include language that at a minimum 25% of grantees in one year will be recompeted. That is an estimated average of 500-525 grantees. There are two additional criteria if 25% is not reached based on the seven criteria.
- If required to recompetete, a grantee could be refunded and still be the best program. This is an opportunity to reflect on what you're doing, and whether your program and systems are providing services to children and families.

C. Powerpoint Presentation for Proposed Designation Renewal System – OHS

- Director Sanchez Fuentes review a Powerpoint presentation describing the seven condition for designation renewal and highlighted the special tribal provisions.
- Grantees monitored in 2009-2010 are the first third to be evaluated. Any information from June 12, 2009, onward can be used to determine if a grantee gets recompeted.

- OHS internal team includes OHS staff, General Counsel, Grants Management, and Program Specialists. The internal team is focusing on how to manage recompetition every month. It impacts Regions and OHS. There are implications for long-term lease, inventory, buses, record keeping, 5-year fiscal vs. indefinite. All triggers will be transparent; grantees can make their own determination. It shouldn't come as surprise. You will know when you have an indicator.
The 25 percent of grantees that will have to compete is part of the proposed system for designation renewal.
- Be precise, smart and insightful in your comments to the proposed system. The government has to be accountable for written comments received on the proposed rule. We need to know how to make the process reasonable from your perspective.
- By law, the comment period for the proposed designation renewal system is 90 days. Director Sanchez Fuentes will ask if it can be extended for the tribal process because Tribes have their own tribal clearance process.

Powerpoint Presentation for Proposed Designation Renewal System – AI/AN Response

- Some Tribes receive triennial report. How do you implement a system that's transparent? We have to know when this begins, and we have to strategize.
- Sometimes there's a long period of time before we see results of triennial. Also the field can change if you don't reach outcome of 25% so that doesn't support transparency.
- This is one example when you must have tribal liaison on that community or else we won't be heard.
- Concern about OHS walking away from tribal programs and looking at state run early childhood education programs. The possibility is that in tribal recompetition, money goes away from tribal grantee, which supports tribal children in HS.
- In the *Roadmap*, there is no reference to tribal government, tribal Department of Education, or sovereign nations as partner. Implication is they're being chopped off – we're not a part of it. Example is in competition for Centers of Excellence. The HS Act said one Center of Excellence in a tribal program. You've set the stage for not following what's been said.
- Problem with putting school readiness in hands of state and aligning the goals. There are areas where the state's goals don't align with tribal beliefs and goals. You're taking away power and taking away what Tribes have done.
- We were in the room with President Obama who said, "I won't forget the Tribes." I appreciate your coming out here. I feel like I did something wrong, and we need consultation. A comment period isn't consultation.
- Some states don't want Tribes to exist. It's an issue of survival. It's important that the Federal government recognize this. We have a good relationship with our school district, others have a hostile relationship. Some Tribes don't have relationship with states so they're focused on sovereignty.
- We take from our own checking account for HS. It's not AI/AN with fiscal problems.
- Could a church group from tribal community compete?
- I don't know any tribal council that would let non-tribal group run a program. Even a neighbor Tribe, it would be insulting. To run HS is privilege, it's a right.

- I've been HS Director for 6 years, one deficiency is going to put nearly every tribal program into recompetition. There are 1,800 regulations. It's hard.
- It's important to have a tribal representative on the final committee.
- Question: Are you going to accept requests for extension on the comment period for the Notice of Proposed Rule Making (NPRM)? The Dept. of Energy accepted extensions. We have many priorities with a new director.

D. Program Quality and Funding – AI/AN Comments

- (Muckleshoot Tribe): In our Tribe, leaders have new vision and investment in tribal education k-12. We've opened up a new HS building and are looking for a tribal college. As program manager, there are challenges in program quality and funding. We need more funding. It's awkward to come to tribal leaders to ask for more funding. We're thankful for state and Federal partnerships and work toward higher standard of quality. But sometimes things come into conflict with Federal partners because each nation has its own government and ways working. We really need to work like parents do, in partnering, not work with you as if we're a child. We have incredible plans, including how we are doing Native American specific research on early childhood education (ECE) and an ECE academy to train ECE leaders. We don't ask for Federal funding, but the Tribe sees it as an important issue and are supportive – What does your program need to effectively address funding for native educators and support for bachelor's degrees and higher degrees. I have a lot of Native Americans, but they're not in our Tribe and can't get funding. Excellent educators are out of jobs.

E. Teacher Compensation – AI/AN Comments

- (Suquamish Tribe): There are more challenges when talking about the EHS population because so many other pieces of learning need to be directed toward them. It's the same issue when you work at each of the two levels of ECE within the tribal structure. We're running out of that level of expertise in rural areas. There are only so many people with degrees. Our goal is to have as many tribal members working as possible. When you look at someone who has been in the program for 21 years, and she's 52 – who's going to pay for that? She's training professionals all over this county and state. If she has to get a B.A., what will it do for her? HS pay isn't comparable to school district. HS staff work longer hours and a longer year, and have more tasks than at the school level. We don't have ways to attract them.
- We had to take out our education manager, or we would have been written up. She's gifted educator, but now is not working with our children.

Teacher Compensation – OHS Response

- Bear in mind, there is probably not going to be more money for quality and expansion. We, as communities, have to make difficult choices between the number of children, services, and teacher pay. Our expectation is that you have a professional development plan for those individuals. Whether they're taking more courses or attending conference, we want to see our folks moving forward.

- (Director Sanchez Fuentes): There is deadline, but I'm willing to work with you. I see every monitoring report, and I look at teacher qualification, I want to work with you, but you have to make tough choices.

F. Teacher Qualifications – AI/AN Comments

- We had to take out our education manager, or we would have been written up. She's gifted educator, but now is not working with our children.
- We may have a great professional development plan, but if by September 2013, some teachers won't have finished and be qualified under the law, there will be no waivers.
- (Yakama Tribe): If you have less staff, then you risk burning out staff who will eventually leave. We need to focus on retention and provide funding to programs to offer money if you have an A.A.
- We had our review last year. Native teacher has CDA, working 16 years plus, Tribe is paying for her schooling. We have a non-native teacher with a B.A. who has been in HS less time. When they scored our teachers on CLASS, the native teacher received just as high a score. Could OHS take into consideration, for those teachers and education managers who score high, a certification program where these individuals can be waived from the standard you're placing on these teachers?
- (Yakama Tribe): If only we had tribal college that could grant credits for life skills and knowledge. An elder is working with parents and has everyone's respect. A valuable piece of HS is to get parents involved. Tribes should lobby to go into self-determination [P.L. 93-638, Title I, the "Indian Self-Determination and Education Assistance Act of 1975"] because requirements keep going higher, but funding doesn't match. We need to be credited for what we value as native people. Training plans need to be reasonable for a geographic area. We were one of first Tribes to have HS, one of buildings is more than 40 years old; one has mold. Facilities compete with teacher compensation.
- Area Health Education Center (AHEC) could partner with tribal colleges. There are great models in Washington where teachers can get certification for teaching language and culture. Look at states that have this in lieu of B.A. or general degree programs.

Teacher Qualifications – OHS Response

- It's important to have the conversation with tribal colleges about credits. Advocacy plays a huge role in laws.

G. Non Federal Match – AI/AN Comments

- (Nisqually): Each time we have a change, it's at the cost of programs. When does OHS or programs become responsible for costs? We cannot use buildings or parent transportation for NSF. We're being heard, but not about funding. We match HS grant by 60%. We pay salary and travel. But when they get B.A., they go to the school district. Our Tribe can pay that cost so we don't lose staff. We put money into teachers, then cut back on family services, mental health. I think OHS needs to take a look at when are we going to get more money.

Non Federal Match – OHS Response

- No one at previous Tribal Consultations has asked the question about who takes responsibility. Congress sets the budget and laws. We can't advocate because we are the Federal Government. We try to implement laws in reasonable way.

H. Self Governance – AI/AN Comments

- We're a self-governing Tribe. We need to know government-to-government, how it impacts our Tribe. Most Tribes aren't self-governing. It may be our Tribe who needs a forum like this to take back to Congress.

Self Governance – OHS Response

- Director Sanchez Fuentes will find out what "government-to-government" means as it relates to HS, especially with Administration for Native Americans (ANA).
- There are discussions about putting all the money from ACF in one pot. So the Tribe is granted money and is responsible for outcomes, not so much for regulations. It sounds like some of you are saying give us money, we'll deal with regulations. ACF is in the process of a pilot about self-governance.

I. Program Budget – AI/AN Comments

- Tribes are awarded proportionally less money than non-tribal programs looking at budget figures. What formula is used? Do most Tribes underrate cost? If we go into recompetition, could we restate costs?

Program Budget – OHS Response

- There is no formula. You submit your cost per child. You may have some negotiation with the program specialist. It's based on information you give us. When a grantee applies for money, it's the base carved in stone. We don't have the authority to give you more money than you ask for. Only if there's money for quality or expansion. Our only authority is to say if you can't serve 100 with this amount, can you serve 80.
- You can request reduction in enrollment. Another option is expansion money that Congress gave to Tribes in the 2011 budget. We'll have to make decisions about allocating money in AI/AN.
- If you go on recompetition, the money is the same, but you can redesign the program. Allocation is the same unless Congress appropriates new funds.

J. Performance Standards – AI/AN Comments

- You're adding more regulations; the binder is getting bigger and bigger. Suggestion to make CFR 1301 into a color-coded booklet. So when I meet with teachers and teaching assistants, I can say read this. Also cross-train. We have staff who start out and become teacher, family advocate, etc.

Performance Standards – OHS Response

- Perhaps OHS can put together something like the Rainbow Series.

K. Monitoring – AI/AN Comments

- Don't send out review team leader who's never been to a Tribe.

- Programs should educate their staff to be reviewers so we have Native American reviewers, though it's hard to lose a good staff member
- With change in T/TA system, I'm glad to hear there is a national grouping for AI/AN. We don't want to get sucked into state T/TA. There are unique things in each Tribe. The National Center on Cultural and Linguistic Responsiveness doesn't focus on native cultures or a partnership with tribal.

Monitoring – OHS Response

- With change in T/TA system, I'm glad to hear there is a national grouping for AI/AN. We don't want to get sucked into state T/TA. There are unique things in each Tribe. The National Center on Cultural and Linguistic Responsiveness doesn't focus on native cultures or a partnership with tribal.
- Head Start is about multicultural best practices and principles in classroom. We expect that Center will do outreach to tribal programs.

L. Relationship with LEAs – AI/AN Comments

- We didn't know that the LEAs had to have an agreement with HS. What can OHS do to get them to have a partnership or to recognize that we've made a referral of a child?

Relationship with LEAs – OHS Response

- The HS Act of 2007 puts the requirement on HS, not on the LEA. If you have documentation, that's all you or we can do. We encourage you to collaborate. We are attempting to form a Memorandum of Understanding with the Assistant Secretary of Education to send to the LEAs.

M. Unannounced visits – AI/AN Comments

- It's a breach of protocol for the Federal Government to enter sovereign nations without written request. Talking to the board isn't same as talking it to tribal leaders. You can have consultation, but it's in writing that you must have permission, not notification. What concerns us is lack of respect and lack of communication.
- President Obama has made a commitment to tribal treaties for government-to-government relations. How can OHS then have unannounced visits? It's matter of respect. This makes me think that you don't have faith in your controls and monitoring now if you have unannounced visits.
- With the GAO report and eligibility issues, why not address programs around eligibility? That means more than coming in unannounced. For me to get signature of a tribal leader and Council would be virtually impossible. How much information are you getting? Will it be mostly on operations? Are we being judged on things for recompetition?
- We're trying to be accountable, keeping 10 years of receipts. We have a problem with rodents, and a fire destroyed documents. We're trying to find money for space and trying to put things on a hard drive. All these improvements come at a price.

Unannounced visits – OHS Response

- This has mixed reactions. At the Director's meeting, half of the group was fine with this, the other half was not. It's not the government-to-government relations, it's more the unannounced nature of the visits and getting the tribal team available.
- With the GAO report that came out this Spring, we made a commitment that we would conduct unannounced visits. We had to answer to criticism that there are some HS programs doing bad things.
- It's helpful if you have representatives in Congress. That's a powerful way to advocate.
- We take a percentage of those already scheduled for monitoring to do an unannounced visit. We know many programs use monitoring as an event. We want it to be part of the process – how is your program functioning – without all of the preparations that programs often do. We're keeping all this in mind. We want Congress and taxpayers to be confident.
- If the visit is unannounced, we have to see that your systems are operating, even if key staff are out. With each cycle, we're learning. We're being more precise about what we need to know and to look at. We want to be precise, and identify what carries weight.

N. Program and Grant Specialists – AI/AN Comments

- (Coquille Tribe): We have waited for budget modifications, with 20 calls over 3 months. There have been changes in grants specialist and all this takes from operation of the program. We recommend that specialist stay with program for at least 2 years.
- I come from a deficient program. Our program specialist is one of us. Systems are starting to work for Tribes.

Program and Grants Specialists – OHS Response

- Other tribal programs have talked about this during consultations. We've engaged in direct dialogue with the Office of Grants Management to talk about a seamless process between program specialist and grants. We've initiated several trainings with our program specialist to support AI/AN. The recommendation for 2 years is good. On the grants side, that piece is more difficult. OHS does not directly supervise grants specialists, but hope they will maintain their staff. If they have to make change, we hope to notify grantees in time.
- First line is the program and grants specialists, but if you feel like it's stalled, email or call Director Sanchez Fuentes directly. Our program specialists are doing their best, and sometimes it's a lack of systems to do their best job. We're putting together systems to fill gaps. We're going through a reorganization in OHS to create a grants and contracts division to help you deal with challenges.
- Some program specialists are still learning and it's difficult if they're put with a new director. They don't have to know everything, but they can do research. If this is not happening, let me know. We've made it a performance issue and expect them to connect with grantee once a week. We expect program specialist to initiate the communication. Head Start director can call too.

O. Centers of Excellence – AI/AN Comments

- We hired a grant writer in the hopes that we would be named a Center of Excellence. We wouldn't have spent money if we had known we would be thrown into the whole pool.

Centers of Excellence – OHS Response

- The Act states that the HHS Secretary can designate up to 200 Centers of Excellence. We awarded open competition for bonus grants. We will be designating Centers of Excellence, including tribal programs. We're going to do it in groups. We awarded the top 10; in next round, we'll have tribal, Migrant and Seasonal Head Start, District of Columbia, and Puerto Rico.
- The Secretary has \$200,000 for appropriations. We never will have enough money for 200 grantees. We heard that programs wanted to be designated as Centers of Excellence even without a bonus so that they could use that for leverage with foundations, etc.

P. Mental and Oral Health Services – AI/AN Comments

- Some concerns fall in line with IHS, things we've been cited on previously. Access to mental health is difficult because of stigma. It's the parents' decision, but the program gets cited.
- We're rural. We have three districts that are 60 and 90 miles apart. It can be 1-2 hours to the nearest dentist. We can provide transportation, but if the parent doesn't follow through, the program is cited. What can we do to prove that we're going the extra mile?
- We use IHS to do electronic health record that moves with child. We work closely with that team. As mandated reporters, if we know this is causing harm, we refer family to child welfare.
- Sometimes we have to wait 3 months for follow-up appointment. Our program year is closed June 1, and we did PIR and showed one student didn't get work done, but we had referral in place.
- We taught parents that they are their child's first teacher. Someone in community, an elder, can help.
- IHS is doing a good job. They screen native and non-native children.

Q. Indirect Costs – AI/AN Comments

- Our Tribe is on an April 1 – March 31 cycle. Our indirect rate is being negotiated at the beginning of calendar year. As this is being renegotiated, HS funders say we don't have an accurate indirect rate and they don't pay toward indirect costs. They disallow last quarter of indirect rate because we're in a new year. It's the only [Federal] program that does this.
- IDC pays for personnel. It's more on the Tribe to pay for this. HS bumps against Federal laws.

Indirect Costs – OHS Comments

- We encourage them to contact OGM and move out of IDC so you won't lose money. Every Regional Office would have this problem. Grants try to negotiate 2-year IDC rate.
- Ann Linehan will discuss this issue Grants Management Officer and will give Tribes an answer.

R. Risk Management Meetings – AI/AN Comments

- Suggestion that risk management meeting be a working meeting between grantee staff and program specialist. There is no protocol from OHS. Without it being a working meeting, it's not clear who should be there. Reviewing and debating the SF-269 is not helpful.
- Suggest a name change to reflect a strengths-based approach. Having the date set in advance is good.
- This is not good time to know you have new fiscal person. Having grants specialist on the call is helpful.
- Having Tribal Council have to be on call is not necessary.

Risk Management Meetings – OHS Response

- Program specialists communicate with grantee in advance so there are no surprises. For the grants specialists, you have a form and a call before the meeting. Program specialists download PIR data and monitoring report to ensure that there is an action plan or that deficiencies have been corrected. Agenda is set by the grants and program specialist.
- OHS will look into whether to make it optional for Tribal Council to participate and will let Tribes know. Technically, if Tribal Council is on the call, then the Director of OHS should be on.

S. Closing Comments – AI/AN

- Tribes are excited because of OHS leadership. You're hearing decades of frustration.
- Open door policy is welcome.

Closing Comments – OHS

- We are committed to being accountable. Camille Loya has been assigned to be tribal policy lead. We take this information back to OHS, and have one person who keeps things moving and ensures that we're responding appropriately.

The Office of Head Start Tribal Consultation: Fairbanks Alaska, October 20, 2010

Participants

Office of Head Start: Yvette Sanchez Fuentes, Director Office of Head Start; Ann Linehan Director, OHS Division of Quality Assurance, Trevondia Boykin, OHS Program Specialist; Cynthia Walker, OHS Senior Program Specialist, Nancy Hutchins, Program Manager, Region X.

Tribal leaders or their representatives: (See Appendix for detailed listing)

Introductory Remarks

The Tribal Consultation Session began with opening remarks from Yvette Sanchez Fuentes commenting on the two consultations in Auburn Washington and Fairbanks Alaska being the most well attended of the Fiscal Year 2010 consultations. She expressed the purpose of the consultations was to engage in meaningful dialogue and to learn of both the successes of AI/AN programs and the challenges faced by tribal communities.

An opening statement was offered by an AI/AN representative who commended the timing of the Alaska consultations coinciding with the Elders and Youth conference in Fairbanks. Following this opening statement the AI/AN representative introduced her grandmother and noted there are fewer than 60 fluent speakers of her grandmother's language. She expressed that it makes her grandmother sad, and she feels responsible to teach it. Aleut and Russian were her first languages, then she learned English. Teaching language is about teaching respect for land and ancestors, how to survive, pride and confidence in who they are. Being able to speak two languages expands their minds. Language is not taught to teachers. It is time to teach it before her time on earth comes to an end. Her grandmother, from the Aleutian Pribilof Islands, offered the following in her Native language, which was then translated into English for the record:

- I was born 87 years ago and raised on St. Paul Island, Alaska, part of an island string 1,150 miles long. It's been our home for 10,000 years. It is 500 - 1,250 air miles from Anchorage. I was the first Aleut school board president. Aleutian Pribilof Islands Association (APIA) Head Start was started in the 1990s. Our home is often called "Home of the Winds." There are four Head Start programs. I have witnessed many changes; like the wind, they are constant. In APIA Head Start, I taught language on body parts, names, colors, helped with developing color books, teaching language, dance, crafts, and goods at cultural groups. I love to help youngsters understand where they come from.

Director Sanchez Fuentes thanked the speakers and expressed her commitment to culture and language and how they impact families. AI/AN participants offered that Tlingit,

Haida, and most languages in Alaska face the same challenge. And how hearing someone speak their language is very special.

Director Sanchez Fuentes described the OHS Tribal Workgroup that was convened to support the OHS in planning for the Tribal consultations. The OHS understands that it is not always convenient for consultations to occur in the summer. Director Sanchez Fuentes introduced the *Head Start Roadmap to Excellence* and four priorities that will be implemented over the next two years. These priorities are: revision of the Head Start program performance standards, designation renewal (re-competition), family engagement, and redesign of the Training and Technical Assistance (T/TA) system including six National Centers. Going forward one person in the OHS will be responsible for taking the lead for tribal policy so that the Director can continue to receive ongoing feedback about Head Start and respond to the needs of AI/AN communities.

Discussion/Comments of AI/AN and OHS Participants

A. Designation Renewal – AI/AN Comments

- What happens if a license is revoked?
- How will re-competition look in Alaska where there are remote sites to fly to?
- There are regional nonprofits in Alaska (Tribes). Why didn't criteria look at external factors like whether there is a possibility of another entity to compete? Rural, remote programs are going to be disadvantaged.
- Will there be changes in the next reauthorization regarding recompetition?
- Can a program that is not doing well designate another grantee?
- In small programs, there may be 1-3 staff like in the Aleutian Pribilof. We have responsibility for 1,700 PPS and new information from Reauthorization and only a limited number of people who are responsible for a multitude of tasks.

Designation Renewal – OHS Response

- The concern is for an agency that has had a license revoked by the state or local licensing agency. The Secretary's Advisory Committee felt that local and state licenses are definitions of what a community considers quality. Director Sanchez Fuentes recommended that participants submit comments about this. OHS will do a designation review of 525 grantees, 25% must be competed. There are seven conditions, and if we do not reach the 25%, we can propose two more conditions of either weighted noncompliance or use another reliable instrument like Early Childhood Environment Rating Scale (ECERS). Unlike termination or a suspension, this process is not an adverse action. You can recomplete. If programs are terminated, they can't recomplete for 5 years. OHS will do two visits if necessary.
- We have an OHS team with Central Office and Regional Office staff, as well as General Counsel, looking into implementation. In 4th year, if you meet one of the conditions, you get T/TA for 12 months, and we will review you in 5th year. OHS will share with grantees what the implementation process will look like.
- CLASS is a professional development tool, but we're using it as a gauge of quality. In remote villages, we'll have to figure out how to do it in reliable way. It's not about

scoring teachers, it's about the grantee. The proposed regulations are in the Federal Register. If the rule is promulgated in August 2011, we will begin next October Fiscal Year 2012 with the first cohort. We would look at triennials from 2010 and make decisions about who moves into recompetition. We would impose the additional conditions if necessary.

- The service area is opened up, maybe to school systems. But the law requires that Tribes give permission for a non-tribal entity to come onto the reservation to provide services. This is true if a Tribe is terminated. We want you to make decisions about services. This process doesn't take away services; the Tribe won't lose funding, it will just need another provider.
- When you comment on the proposed rule for recompetition please speak about the positives and negatives you see. Also remember, if you move into recompetition, it's an opportunity to reflect, redesign, and submit a proposal. Alaska is unique. Five grantees are funded out of Region X. OHS will consult with counsel to determine whether grantees in Alaska are considered native organizations or are covered by provisions for Tribes.
- No one knows the impact until we run the first competition. There may be multiple issues we didn't think about.

B. Designation Renewal – Classroom Assessment Scoring System (CLASS) – AI/AN Comments

- National scores were 1 on CLASS. Is this a reality that you're taking into consideration?
- Our last review used CLASS. As the Director, I want to get an idea of how my scores translate into a trigger. We want to start now.
- Rural programs may be unable to complete CLASS certification online. Put the system on DVD.

Designation Renewal – Classroom Assessment Scoring System (CLASS) – OHS Response

- Researchers are working with us. Even emotional support domain indicates good quality in classroom, sometimes more than instructional support. This comment should be submitted in writing. This is a way of gauging progress for kids without testing. We want to see what's happening in the classroom and how programs are addressing that. The onus is on the grantee, not on children. School readiness goals are defined at the local level. It's important to share the Notice of Proposed Rule Making (NPRM) with fiscal, accounting folks.
- There will be Train-the-Trainer sessions for CLASS. There is one in Region X, maybe just one in Alaska.
- OHS will add CLASS certification to the list of materials to be put on DVD.

C. School Readiness Goals – OHS Comments

- Since 2007 grantees have been required to establish and address school readiness goals.

D. Monitoring -- AI/AN Comments

- How soon do we get a monitoring report? When are monitoring reports issued?

Monitoring – OHS Response

- We're looking at that now; our internal systems have to change. Think of monitoring as a process, not an event. When the Director's signature is on the report, that's when you get official notification.

E. Communication with Program Specialists and Grants Specialists – AI/AN Comments

- How quickly we hear about something depends on the relationships between the director and the program specialist.
- In 6 years, we've have had five program specialists. Consistency will help.
- One participant stated that their grantee requested a waiver on FAA. They received verbal approval 10 months later, but has still not received anything in writing.

Communication with Program Specialists and Grants Specialists – AI/AN Comments – OHS Response

- Program specialists are expected to make contact with grantees 1x/week. This contact fosters a relationship. We've provided additional training and are asking for more training. Contact your program specialist because they can facilitate with your grants specialist. OHS is meeting with Office of Grants Management (OGM). Let OHS know of any specific items impacting your getting Financial Assistance Awards (FAAs). We want to hear about it because it can interfere with your programs.
- One recommendation was to assign a program specialist to 2-year stints, according to their experience and program needs. But sometimes because of internal issues, we have to reassign them every few months.

F. Non Federal Match – OHS Comments

- Regarding NFS, the statute gives you authority to request a waiver. It is not a bad thing. The authority is there as long as you meet a condition. We want to be more proactive when the conditions are there. This is a performance issue for our staff.
- There should be a recommendation, and then it's issued in less than 30 days. OHS will try to institute a process and will let grantees know.
- There are disallowances for transportation, home visits, for non-Federal requirements. Maybe take a look at what's to the benefit of your program.
- Some requirements are in the law, like parent transportation. OHS's goal is to put out guidance, realizing every community is different. We see lots of audit findings about NFS. Reading to your child, brushing his teeth before bed, from the public perception, this isn't for the good of Head Start. The burden on the parent diminishes the relationship you're trying to build with them. We don't want to add to the burden of paperwork, but this is a tough area.

G. Indirect and Administrative Costs – AI/AN Comments

- The indirect cap (of 15% for administrative costs) puts a burden on other resources to take up shortfall.
- Will money for Head Start/Early Head Start (EHS) be interchangeable?

- Indirect rate onsite could be 30-35 %. Offsite would be different. If your administrative or indirect rates are higher than the amount in the guidelines, you have to take money out of the program to pay additional costs.

Indirect and Administrative Costs – OHS Response

- You can request a waiver for the administrative cost cap, but it is not often exercised. It is often used for a first year program.
- If we increase administrative cap and there's no more money, then fewer children are being served. We can seek counsel; regulations in terms of fiscal operations are applicable to ACF and we consult with the Division of Grants policy. We'll take back your questions and may contact you to get specific examples.

H. Risk Management Meetings – AI/AN Comments

- I've been on two calls, and the end result was to have another meeting. Recommendations had nothing to do with health issues as we know them. Second RMM was more helpful; it pointed out problem areas.
- After the review, we get on a call with board, tribal leaders, OHS, and then come up with a plan. Things we talk about don't pertain to the grant for that year, like discussing the cost of living. We have people on board who no longer want to sit on it. We talk about non-compliances and deficiencies.
- We fly into Seattle for face-to-face meetings. Although some data from PIR are outdated, the Region can't help us. With health, we are doing everything we can possibly do. We've been discussing health and dental follow-up for years. No one knows how to solve it.

Risk Management Meetings – OHS Response

- OHS is looking at amount of information being requested and holding ourselves accountable to how we use data.

I. Health Services – AI/AN Comments

- We've been working on relationships for a long time. We didn't get anything new out of it. Onus still falls on us to get services.
- Disparities of native children are obvious. We have to change to influence public policy around food policy. Soda is bought under food support programs in states.
- Even the American Dental Association can't get dentists to go out. Regardless of the relationships between OHS and American Academy of Pediatric Dentistry (AAPD), there is no relationship between the AAPD and Alaska Head Start. At the state level, we have made a commitment, and local dentists and leadership made commitment to keep this going with some State Collaboration money to keep it going.
- We had medical issues and in talking with health specialists from OHS, they made us feel that if we connected with Indian Health Services, we wouldn't have problems. We have a 6-10 month wait for a medical visit. We have to collect many Early Periodic Screening, Diagnosis, and Treatment (EPSDT) exams, and there is lag time. We have challenges. We need people to understand the work we do on a daily basis.
- For IHS, there is an 18-month wait list for the 6-month visit.

- Expenses of travel for services – we pay for kids to fly. Arctic Warriors program from Coast Guard and Army brings a team of doctors, dentists every 3 years.

Health Services – OHS Response

- Tribes were included in the dental initiative rollout. They're not usually part of a rollout. Would money have been better spent if we hired a dentist? We didn't solve this, but we created a bigger picture. We have multiple goals. OHS needs to partner with dental schools for a loan forgiveness program. We need to incentivize giving access. What about services for older children, adults? Down the line, we need outcomes like more state systems for providing services.
- OHS needs to see outcomes at the end of the year. Director Sanchez Fuentes said she supports a state system, but she sees the monitoring reports, and must make decisions about programs without systems.

J. Training and Technical Assistance – AI/AN Comments

- We need T/TA for Region XI. We have people in our state who could do a better job than the new T/TA system.
- Money allotted for T/TA in Alaska is not enough given that we have to fly staff to trainings
- Our rural program has a service area of 42 villages, bigger than the state of TX. We're lucky if one person applies for a vacancy and has a high school diploma or says they'll get GED. Most staff are parents or grandparents from the program. We're growing our program, we're trying hard to provide these services. We can't import people from neighboring villages. I hope you give more consideration to programs experiencing this; we have good intentions.

Training and Technical Assistance – OHS Response

- OHS can't change the funding for T/TA but can examine other ways for providing training. Director Sanchez Fuentes has already begun these discussions with Guam and Outer Pacific.
- Grantee specialist will coordinate with grantees. The system is almost ready. Programs will know what they have to document, for how long, and the next steps. The Central Office will be monitoring. It's a new way of thinking about T/TA. Give us feedback. Did it add value to your program planning?
- Direct Sanchez Fuentes will speak to Pat McMahon about more flexibility with T/TA in Alaska. OHS will speak again to directors organizations to see where we can have more flexibility.

K. Teacher Credentials – AI/AN Comments

- It is baffling that programs depend on whether a teacher is qualified if the degree is not in early childhood education (ECE). Some say 20 credits, ours says 51 credits are enough. OHS should tell us if you have a degree, 20 credits in ECE, and years of experience, you're qualified.
- There is also the cultural competency component of teacher credentialing.
- We need guidance on related degrees.

Teacher Credentials – AI/AN Comments

- We have guidance on EHS and family service workers we're sending through clearance. OHS is working on policy issues about preschool and degrees. For EHS with ARRA funding, OHS knew programs would not be able to hire people who were qualified on Day 1. We're understanding and flexible, but we are honoring requirements.
- OHS has determined that California and New Mexico certificates are equivalent to Child Development Associate (CDA).
- OHS is looking into accepting certification from other states. Some states have to add more.
- OHS will reissue guidance on related degrees

L. Facilities – AI/AN Comments

- We want more collaboration. There has to be a systematic approach to look at facilities around our state.
- We can advocate with our Congressional delegation. We are meeting with the Office of School Services. We'll have a dialogue with the commissioner; many schools are on the rebuilding list. They see it as a Federal program and will meet the non-Federal match, but this rebuilding will open the door beyond their means. I encourage OHS and the Region to help us discover resources.
- When we make a strong commitment to match Federal efforts, we're only getting \$200,000 in capital interests to spend among all Head Start.
- There's a high cost of doing business in Alaska. The agency kicks in \$200,000 for utilities and the insurance is going up (40% rise in health insurance). We have sites with no running water, sites falling apart. We're trying to provide quality services, but we'll have to drop slots to keep lights on.
- Even though we are in facilities we don't own, we can't afford upkeep. We're still tasked to do maintenance.

Facilities – OHS Response

- Facilities issue is everywhere. But getting building materials here is costly. No money is set aside for facilities.

M. Closing Comments – AI/AN

- There has to be collaboration between Head Start and other Federal agencies. TANF is not getting the same message about collaboration with us.
- In small villages, there is the challenge of finding qualified employees. In Fort Yukon, everything comes in by plane; the cost of living is so high that people are moving out. In some villages, a growing population is moving to the city, gathering resources and then moving back. Some villages are in decline.
- There needs to be more information about E-rate.

Closing Comments – OHS

- We sometimes have one-time money; we can relook at needs and emergencies. It comes from recaptured funds from programs that haven't spent all of it. For Region XI, by law, any recaptured funding has to stay in Region XI.

- We will have internal discussions about E-rate and come back to you with options for moving forward.

APPENDIX

Tribal Consultation Participants: *Tribal leaders and Tribal representatives*

June 16, 2010	San Diego California
July 15, 2010	Green Bay Wisconsin
July 30, 2010	Tulsa Oklahoma
August 27, 2010	Rapid City South Dakota
October 18, 2010	Auburn Washington
October 20, 2010	Fairbanks Alaska

The Office of Head Start Tribal Consultation: San Diego California, June 16, 2010

Participants: *Tribal leaders and Tribal representatives*

First Name	Last Name	Position	Organization
Esther	Agredono	Director	Colorado River Indian Tribes
Phil	Albers	Policy Council Chair	Yurok Tribe Head Start/ Karuk Tribe
Richard	Armstrong	Councilman	Colorado River Indian Tribes-Head Start
Amanda	Barrera	Councilwoman	Colorado River Indian Tribes-Head Start
Vicky	Bates	Policy Council	Yurok Tribe
Colette	Berg	Head Start Director	Cheyenne Arapaho Tribes
Karen	Condon	Other	Confederated Tribes of the Colville Reservation
Antonia	Dobrer	President	Three Feathers Associates
Mary	Doherty	Other	Colville Confederated Tribal
Teresa	Dorsett	Education Director	Cheyenne Arapaho Tribes
Joe	Dukepoo	Tribal Council Member	Round Valley Indian Tribes
Agnes	Fleming	Director	Lac Courte Oreilles
Gilbert	Gonzales	Head Start Director	Washoe Tribe of Nevada and California
Eugene	Greene Jr.	Tribal Council	Confederate Tribes of Warm Springs
Misty	Horne	Early Head Start Director	Iowa Tribe of Oklahoma
Gayle	Johnson	Director	Bishop Indian Head Start
Michael	Melendez	Director	CA Rural Indian Health Board
Dana	Miguelena	Head Start Director	Yurok Tribe
Kevin	Neidich	Health & Disabilities Coordinator	CA Rural Indian Health Board
Sandra	Platero	Vice President	Mescalero Apache Head Start
Jennifer	Ramey	Head Start Director	Turtle Mountain Chippewa Head Start
Ronda	Ritchie	Program Manager	Howonquet Head Start
Bryan	Samuels	Director	Nez Pera Tribe
Earl	Sandoval	Tribal Council	San Felipe Head Start
Gloria	Smith	Head Start Director	Inter-Tribal Council of Nevada, Inc.
Katie	Smith	Assistant Head Start Director	Yurok Tribe Head Start
Angie	Spino	Administrative Assistant	Warm Springs Head Start
Hazel	Spottedbird	Tribal Council	Mescalero Apache Tribe
Verna	Thompson	Director	Cherokee Nation of OK
Sara	Vasquez	Round Valley	Round Valley Indian Tribes
Mavany	Verdugo	Head Start Director	Rincon Head Start
Danny	Wells	Director	The Chickasaw Nation Head Start

First Name	Last Name	Position	Organization
Valerie	Welsh-Tahbo	Council Member	Colorado River Indian Tribes
Mike	Williamson	Director	Otoe-Missouria Tribe
Cheryl	Wilson	Director	Indian Health Service Head Start Program
Lisa	Yellowfish	Tribal Treasurer	Iowa Tribe of Oklahoma
Tibureia	Yoeupicio-Chambers	Regional Coordinator	First Things First- Arizona

The Office of Head Start Tribal Consultation: Green Bay Wisconsin, July 15, 2010

Participants: *Tribal leaders and Tribal representatives*

First Name	Last Name	Position	Organization
Cathy	Abramson	Board of Director	Sault Ste. Marie Tribe of Chippewa Indians
Jolene	Bowman	Tribal Council Member	Stockbridge Munsee Community
Carla	Estrada-Brannock	Head Start Director	Isleta Head Start and Child Care
Agnes	Fleming	Director	Lac Courte Oreilles Tribe
Forrest	Funmaker	Executive Director	Ho-Chunk Nation
Dee	Gokee-Rindal	Early Childhood/Education Division Administrator	Red Cliff Band of Lake Superior Chippewa
Michael	Isham	Council Member	Lac Courte Oreilles Tribal Government
Monica	Lente	Parent Policy Council	Isleta Head Start and Child Care
Joshua	Lucero	Parent Policy Council	Isleta Head Start and Child Care
John	Pavek	Head Start Director	Oneida Tribe of Indians of Wisconsin
Mark	Pompey	Director of Social Services	Pokagon Band
Pamela	Torres	Birth to 3 Director	Great Lakes Inter-Tribal Council
Linda	Torres	Area Manager	Great Lakes Inter-Tribal Council
Marie	Willis	Director of Education	Pokagon Band of Potawatomi Indians

The Office of Head Start Tribal Consultation: Tulsa Oklahoma, July 30, 2010

Participants: *Tribal leaders and Tribal representatives*

First Name	Last Name	Position	Organization
Susanna	Barnett	Partnership Specialist	Muscogee Creek Nation
Robert	Bialas	Environmental Health Officer	Indian Health Service
Corey	Bunch	Deputy Group Leader	Cherokee Nation
Antonia	Dobrec	President	Three Feathers Associates
Brenda	Edwards	Chairman	Caddo Nation
Rebecca	Hawkins	Head Start Director	Choctaw Nation of Oklahoma
Kathryn	Helsel	Senior Manager	Three Feathers Associates
Louis	Hicks	Director Of Human Development	Muscogee Creek Nation
Misty	Horne	Early Head Start Director	Iowa Tribe of Oklahoma
Melanie	Knight	Education Group Leader	Cherokee Nation
Teresa	Lehman	Director	Central Tribes of the Shawnee Area, Inc.
Charles	Moncooyea	Director	Otoe-Missouria Head Start
Christine	Noah	Business Manager	Caddo Nation of Oklahoma
Gail	Ripley	Program Director American Indian Institute	The University of Oklahoma American Indian Institute
Betty	Smith	Head Start Manager	Muscogee Creek Nation Head Start
Tina	Soto	Director	Caddo Nation Head Start
Rayneta	Stevens	Director	Central Tribes of the Shawnee Area, Inc.
Verna	Thompson	Director	Cherokee Nation Early Childhood Unit
Valerie	Valdez	Director	Kickapoo Head Start
Danny	Wells	Director	The Chickasaw Nation Head Start
Mike	Williamson	Director	Otoe-Missouria Tribe
Lisa	Yellowfish	Tribal Treasurer	Iowa Tribe of Oklahoma

The Office of Head Start Tribal Consultation: Rapid City South Dakota, August 27, 2010

Participants: *Tribal leaders and Tribal representatives*

First Name	Last Name	Position	Organization
Carmelita	Bear Ribs	Director Head Start Program	Standing Rock Sioux Tribe
Dayna	Brave Eagle	OST-TEA Director	Oglala Sioux Tribe
Pam	Brown	Tribal Sub-Chief	St. Regis Mohawk Tribe
Mary	Cavanaugh	Planner	Spirit Lake Tribe
Tom	Christian	Tribal Leader	Fort Peck Tribes
Lynne	Colombe	Education Director	Winnebago Tribe of Nebraska
Cody	Dogeagle	Projects Manager/Tribal Liaison	Standing Rock Sioux Tribe
Edith	Finley	Health Specialist	Standing Rock Sioux Tribe
Renetta	Goeson	Director	Sisseton Wahpeton Oyate
Vanessa	Harlan	Director	Omaha Tribe Head Start
Tom	Hayden		North West Indian Head Start Coalition
Cynthia	Hutchinson	Maliseet Head Start Director	Houlton Band of Maliseet Indians
Bryce	In The Woods	Council Representative/Chairman-Education Committee	Cheyenne River Head Start Program
Shirley	Jewell	Head Start Director	Aroostook Band of Micmacs-Little Feathers Head Start
Donna	Koernke	Treasurer	North West Indian Head Start Coalition
Amy	LaPointe	Director	Winnebago Tribe of Nebraska
Rhea	LeCompte	Policy Chairperson	Cheyenne River Head Start
Hilda	Marshall	Director	Cheyenne River Head Start
Nancy	Martin	Health & Disabilities	Winnebago NA Head Start
Pat	Madsen	Director	Lower Brule Sioux Tribe
Vincent	Merrick	Tribal Council Member	Omaha Tribe Head Start Program
Jeff	Miller	Tribal Council Member	Omaha Tribe
Valerie	Minery	Education Manager	Standing Rock Head Start
Myra	Pearson	Chair person	Spirit Lake Tribe
Shirley	Poor Thunder	Consultant	N/A
Myron	Pourier	OST 5th Member	Oglala Sioux Tribe
Vonda	Pourier	Acting Head Start Director	Rosebud Sioux Tribe
Angela	Rousu	Director	White Earth Head Start Programs
Elmer	Shelltrack Jr.	Disabilities Coordinator	Standing Rock Sioux Tribe/Head Start Program
Linda	Sheridan	Omaha Tribe CTO	Omaha Tribe Head Start
Travis	Silk	Transportation Manager	Standing Rock Sioux Tribe/Head Start Program

First Name	Last Name	Position	Organization
Joyce	Thomas	Director	Santee Sioux Nation
Jason	Thompson	Tribal Council	Spirit Lake Tribe
Roger	Trudell	Tribal Chairman	Santee Sioux Nation
Tanya	Tullos	Director, Early Childhood Education	Mississippi Band of Choctaw Indians
Lehua	Walker	Health Disabilities Coordinator	Omaha Tribe Head Start
Jeffrey	Whelan	DSS Commissioner	St. Regis Mohawk Tribe
Viola	Wood	Head Start Director	Fort Peck Tribes
Caroline	Yellow Robe	Planning Grant Writer	Fort Belknap Indian Community: Home of the Gros Ventre & Assiniboine Nations

The Office of Head Start Tribal Consultation: Auburn Washington October 18, 2010

Participants: *Tribal leaders and Tribal representatives*

First Name	Last Name	Position	Organization
Kelly	Baze	Tribal Council Member	Port Gamble S'Klallam Tribe
Julie	Burnett	Head Start Manager	Quinault Indian Nation
Rose	Butterfly	Director	Yakama Nation Head Start
Lancia	Charles	Policy Council Chair	Lower Elwha Head Start/Early Head Start
Kimberly	Charles	Policy Council Treasure	Lower Elwha Head Start/Early Head Start
Karen	Condon	Head Start Director	Confederated Tribes of the Colville Reservation
Alethia	Coughenhour	Policy Council Secretary	Lower Elwha Head Start/Early Head Start
Joe	Davalos	Superintendent of Education	The Suquamish Tribe
Gorotia	Edwards	Director	Nooksack Indian Tribe
Leonard	Forsman	Tribal Chairman	The Suquamish Tribe Head Start/Early Head Start
Tashena	Francis	Policy Council Vice Chair	Lower Elwha Head Start/Early Head Start
Eugene	Greene, Jr.	Warm Springs Tribal Councilman	Confederated Tribes of Warm Springs, Oregon
Jaclyn	Haight	Early Childhood Education Program Director	Port Gamble S'Klallam Tribe
Rachel	Heaton	Policy Council Chair	Muckleshoot Tribe
Russell	Hepfer	Tribal Council Member	Lower Elwha Klallam Tribe
Vickie	Hill	Director	Makah Tribe Head Start/ Early Head Start
Edie	Hill	Head Start Director	Samish Indian Nation
Lisa	Horn	Director	The Suquamish Tribe Head Start/Early Head Start
Jerome	Jainga	Director	Muckleshoot Indian Tribe
Julie	LeClair	Family Services/Health	Skokomish Head Start
Deborah	Lee	Program Manager	Nisqually Tribe Head Start
Virgil	Lewis	Yakama Nation Tribal Council	Yakama Nation
Toby	McClary	Tribal Council	Confederated Tribes Of Grand Ronde
Linda	McCloud	Program Director	Nisqually Tribe Head Start
Chris	Mercier	Council Member	Confederated Tribes Of Grand Ronde
Edward	Metcalf	Council Member	Coquille Indian Tribe Head Start
Jane	Metcalf	Head Start Director	Coquille Indian Tribe Head Start
Dennis	Olson	Commissioner of Education	Mille Lacs Band of Ojibwe
Rebecca	Peck	HHS Director	Samish Indian Nation
Tonya	Ritchie	Head Start/EHS Director	Lower Elwha Klallam Tribe
Tamara	Rogers	Tribal Leader	Native Head Start
Wendy	Sampson	Policy Council Secretary	Lower Elwha Head Start/Early Head Start

First Name	Last Name	Position	Organization
Cathy	Sampson-Kruse	Cay-Uma-Wa Head Start Manager	Confederated Tribes of Umatilla
Kristy	Tomaszewski	Grants Director	The Suquamish Tribe
Stella	Washines	Yakama Nation Tribal Council	Yakama Nation
Althea	Wolf	BOT Member at Large	Cay-Uma-Wa Head Start
Thomas	Younper	Council Member	Coquille Indian Tribe Head Start

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Participants: *Tribal leaders and Tribal representatives*

First Name	Last Name	Position	Organization
Ralph	Andersen	Chief Executive Officer	Bristol Bay Native Association
Janet	Andrew	Family Coordinator	Association of Village Council Presidents Head Start
Jacqueline	Archer	Head Start Program Director	Chugachmiut Head Start
Nora	Atienza	Finance Director	Council of Athabascan Tribal Government
Debi	Baldwin	Division Director	RurAL CAP
Bruce	Baltar	General Council	Bristol Bay Native Association
Susan	Barrett	Health Coordinator	Tanana Chiefs Head Start
Sheila	Beaver	Head Start Director	Association of Village Council Presidents
Malinda	Besett	Head Start/Early Head Start Director	Kawerak, Inc.
Tara	Bourdukofsky	Human Services Division Director	Aleutian Pribilof Islands Association
Mary	Bourdukofsky	Elder	Aleutian Pribilof Islands Association
Ann	Brantmeier	Disabilities/Mental Health Coordinator	Tanana Chiefs Conference
Loren	Bullard	Health/Nutrition Specialist	Kawerak, Inc.
Kelly	Caldwell	EHS Home Base Coordinator	Tanana Chiefs Conference
Lila	Cardenas	Specialist	Fairbanks Native Association
Joel (Jay)	Craft, Jr.	Vice President of Children and Family Services	Kawerak, Inc.
Doreen	Deaton	Deputy Director	Fairbanks Native Association
Janice	Dickens	Board Member	Kawerak, Inc.
Angela	Foster-Snow	EHS Program Director	Fairbanks Native Association
Melora	Gaber	Education Specialist	State of Alaska
Rebecca	Ginn	ERSEA Assistant	Tanana Chiefs Conference
Patrice	Griffin	Head Start Director	RurAL CAP
Audrey	Jones	Board of Directors/Policy Council	Fairbanks Native Association
Marita	Kameroff	EHS Health Coordinator	Tanana Chiefs Conference
Sarah	Kuenzli	Other	Head Start/Early Head Start
Mark	Lackey	Executive Director	CCS Early Learning
Colleen	Laroux	Family Services	Tanana Chiefs Conference Head Start
Racquel	Martinez	Child Development Director	Tanana Chiefs Conference
AnnMarie	Mattacchione	Program Director	Play n Learn Community Head Start
Mary	Pullella	Education Coordinator	Tanana Chiefs Conference Head Start/Early Head Start
Albert	Rinehart	Director	Central Council of the Tlingit and Haida Indian Tribes of Alaska

First Name	Last Name	Position	Organization
Bonnie	Rogers	Education and Disabilities Coordinator	Play n Learn Community
Anne	Shade	Head Start Director	Bristol Bay Native Association
Dirk	Shumaker	Executive Director	Kids' Corps, Inc.
Teresa	Smith	Head Start Coordinator	Kenaitze Indian Tribe
Bertha	Solomon	Early Head Start Program Manager	Council of Athabascan Tribal Government
Ben	Stevens	Executive Director	Council of Athabascan Tribal Government
Paul	Sugar	Director	Alaska Head Start-State Collaboration Office
Jean	Timmerman	Wellness Manager	Bristol Bay Native Association Head Start
Mark	Wasiarski	Head Start Director	Aleutian Pribilof Islands Association
Mary	Willey	Head Start Program Director	Fairbanks Native Association