



**Department of Health and Human Services (HHS)  
Office of Head Start (OHS)**

**Virtual Tribal Consultation  
Summary Report**

**July 12, 2022**

**OHS Representatives**

**Tala Hooban**, Acting Deputy Director

**Heather Wanderski**, Director of Program Operations

**Todd Lertjuntharangool**, Regional Program Manager, Region XI American Indian Alaska Native (AIAN)

**Trevondia Boykin**, Supervisory Program Specialist, Region 11

**Delroy Grant**, Supervisor Program Specialist, Region 11

**Greeting and Introductions**

Tala Hooban, Acting Deputy Director, welcomed attendees, and expressed her excitement to attend today's consultation as this is her very first Tribal Consultation.

Heather Wanderski, Director of Program Operations, welcomed attendees, and expressed her excitement to attend today's consultation. Before turning the meeting over to Mr. Todd Lertjuntharangool, she recognized his hard work and thanked him for his service as a liaison, keeping her updated about what's happening and the things that can be done to better support tribal programs.

Mr. Todd Lertjuntharangool welcomed and greeted the attendees. He gave a brief introduction, sharing his background and allowed the other members of the AIAN leadership team, Delroy Grant and Trevondia Boykin, Supervisory Program Specialists, to introduce themselves before transitioning to the OHS PowerPoint presentation.

**Transcript from OHS Informational Overview/Presentation**

**Todd Lertjuntharangool:** Thank you so much, and good afternoon or good morning, folks who may be joining us in from further out west.

***National Overview***

**Todd Lertjuntharangool:**

The Office of Head Start funds early child development programs which serve nearly a million children and their families each year. The majority of programs provide services to three and four-year-old children. We do also have a growing number of programs who are serving infants, toddlers, and pregnant women in Early Head Start programs.

***FY2021 Tribal Consultations***

**Todd Lertjuntharangool:** The Office of Head Start facilitated three virtual Tribal Consultation sessions. Virtual of course, just because given whether we were in a pandemic, being in person was a significant

challenge, so we did hold those three sessions. Across those sessions, we heard from tribal leaders and some of the main priority areas that they brought up were around eligibility. A lot of the testimonies having to do with the statutory requirements for eligibility for the Head Start program, staffing, concerns around staffing, which included credentialing and also included staff salaries and budgets. Facilities, we heard from trouble leaders on the need for new facilities to support healthy environments for children and families, and certainly a big priority for culture and language and the inclusion of culture and language in our Tribal Head Start programs.

### ***Program Operations***

I wanted to provide a summary of our regional enrollment for the last program year, or school year. From the table on the screen, you can see that between September of 2021 and May of 2022, our enrollment in both Head Start and Early Head Start did fluctuate. Programs stayed between 70% and 80% for the most part. This is a testament to the hard work of our programs and so we certainly want to acknowledge the amazing work they've done in ensuring 7 or 8 out of 10 children in their community who needed service had a service provider to go to. We also can see that enrollment and certainly operations in terms of in-person and virtual service did correlate with when there were increases in cases and new COVID-19 variants that came out.

### ***FY21 Funding Update***

**Todd Lertjuntharangool:** In 2022, Office of Head Start tribal programs were awarded a total of \$311 million. That figure included the \$6.3 million increase for COLA and just under \$2 million for quality improvement. One thing that's not listed on here that I do want to also make note of is that the Office of Head Start also did receive a \$2 million increase to support tribal colleges and universities around the country. And so hopefully we continue to see appropriations for that and increase appropriations to support the workforce for tribal Head Start program.

### ***COVID Appropriations***

**Todd Lertjuntharangool:** Snapshot on the COVID specific appropriations that we received. This includes the CARES appropriations that we received in 2020 and the CRRSA and the ARP or American Rescue Plan funding that we received in 2021. With these, our tribal programs received just under \$19 million for CARES, \$6.5 million for CRRSA, and \$26 million for ARP. And then that third column on the right, you're going to see the percentages of the drawdowns or the actual liquidations of those at the national level. So, one thing we are working to do right now is really support programs in making sure they understand how they can utilize those funds to apply them as current needs arise. These particular figures, again, noted by the asterisk are as of May of 2022.

### ***What have we been up to in 2021?***

**Todd Lertjuntharangool:** Many of the areas we have focused on over the past year were driven by what we heard in consultations in 2021. This past winter, the Office of Head Start's Region 11 did engage in our annual regional needs assessment. And that assessment for folks who may not be aware is really just a review of ongoing data sets that we collect at a national level. This includes things like tribal consultation's testimony. It includes the program information reports or the PIR that our programs submit. It includes monitoring data, training, and technical assistance data. It also includes our AIAN FACES data collection and also our collab office needs assessment. And what we typically do is we bring together these various data sets and we review those to extract the highest needs and most urgent priorities of our tribal programs around the country. One thing that was unique about what we did this past winter was this past winter was the first time that we actually had several directors from AIAN programs around the country, actually

participate in that with our team internally, and so a big thank you to the National Indian Head Start Directors Association (NIHSDA) for facilitating that and really working to ensure that we implement a more meaningful partnership and make use of how our directors can provide input so that the way we respond to those needs is more accurate and targeted to what our programs are experiencing. That needs assessment did identify priorities for us for the coming year. The three larger ones were around fiscal, around staffing, and around eligibility and enrollment. We know that we're going to be seeing a lot of resources and time allocated toward those areas in the coming year. And actually, I think by mid-August, we're hoping to get out our events booklet, which will cover the calendar, the full calendar year from August through June of 2023. It will cover all the different TA clusters, all the different training events that will be happening around the country that are based off of that needs assessment that was completed. So again, big thank you to the NIHSDA Board for their support.

Before I ended, I did want to ensure that I made note of the next OHS tribal consultation session. OHS is facilitating 3 sessions this year, and our next session will be our first in-person session in over 2 years. That session will take place on Monday, August 15<sup>th</sup> in conjunction with the North West Indian Coalition Conference in Airway Heights, Washington.

### **Meaningful Consultation with Sovereign Nations**

#### ***Transcript from Testimony of Council Woman Jennifer Webster: Councilwoman Oneida Nation***

**Jennifer Webster:** Good afternoon or good morning, Jennifer Webster, Councilwoman for Oneida Nation. We are located in Wisconsin, just outside of Green Bay. We have about 17,000 membership worldwide with about 4,500 here on the reservation. And we're split between two counties, Brown County and Outagamie County.

So first I want to speak about the income eligibility for Head Start. And I know you just went over a lot of the priorities for '22, '23, and most of my talking points surround those same issues. Income eligibility is a hindrance for many tribal Head Start programs with many states implementing 4k options in their educational systems that have no income limits. Head Start is losing child participation due to the tribal over income parents opting into 4k programs instead, limiting access to Head Start due to income takeaways.

The emphasis of cultural language programming for our children in their early years of development. We recommend that income limits be eliminated from Head Start eligibility criteria. Eligibility should be focused on tribal enrollment and descendants so that these children have equal opportunities and exposure to culturally relevant curriculum, practices, and languages. All American Indian, Alaska Native children should be categorically eligible in recognition for their increased vulnerability due to the high rates of adverse childhood risk factors, health disparities, historical trauma, and damage to cultural identity.

We also have recommendations for funding to ensure that the federal government meets its unique trust responsibilities for tribal nations and communities. We request funding to maintain qualified teaching staff. The Head Start Act continues to increase the educational requirements for teaching staff but does not provide adequate funding levels to Tribal programs that would allow programs to remain competitive with current wages and to increase starting wages the wage scale of the program. The impact of the wage increases, Oneida Nation recently raised our wages to remain competitive with other employees in our area with more wage increases expected in the next few years. So as a result, programs have had to adjust their entire pay scales to avoid wage compression, that's when the lowest paid workers such as substitute

teachers, edge closer to the higher paid employees with degrees. Without increased funding or an option to renegotiate a program's cost per child, many programs will be forced to reduce our already overburdened staffed and/or compromise program elements. Then in regard to facility funding, tribal Head Start programs also need reliable funding to maintain facilities.

Tribal Head Start grantees have reported the need for facility improvements that include both major and minor renovations, as well as the need for new construction. Often, there is a lack of alternate facilities in rural and remote areas forcing grantees to spend significant portions of their budget to maintain environmentally safe facilities. In previous years, our program has had to make unexpected equipment and building repairs at one of our older Head Start sites to ensure the safety of our children and staff. We ask the Office of Head Start to create reliable recurring funding opportunities for renovation or construction facilities. So thank you for this opportunity to provide testimony. And we will also be submitting our written comments as well. Thank you so much.

### **OHS Remarks and Response to Testimony: Jennifer Webster.**

**Heather Wanderski:** We are recognizing and understanding that there are challenges around enrollment. Certainly, the workforce has had a big impact as well as salaries. This is certainly something that we're working on nationally and giving as much support as we can to all of our programs around supporting workforce through offering the information memorandum on competitive incentives, making sure that programs know and understand how they can use their existing funds to leverage additional supports for workforce. We understand the educational requirements is a challenge, and we are continuing to work with tribes around understanding where we have limitations based on the Head Start Act, but where we also have some flexibility with understanding how we monitor for those requirements as well. But also, engaging with your Regional Office is certainly very important if you are experiencing challenges related to staffing and you're trying to figure out how to best meet the needs of your community.

Certainly, exploring options to see what might be available to try to address under enrollment challenges as well as workforce challenges and such. So, I would offer that. Todd, I wasn't sure if you had anything that you had wanted to make mention on. Challenges around facilities and the desire for reliable recurring funding, something that we continue to advocate for with Congress. I believe last year at one of our consultations did talk about there was a possibility or we had put forward a request. It did not go through, but we'll continue on that front because we recognize that certainly has a significant impact on operations because we want to be able to provide healthy, safe environments for our children to learn. We continue to try to advocate on that front as well.

**Todd Lertjuntharangool:** Eligibility has been a heavy topic at Tribal Consultation now for the last several years, and so I do want to take a moment to acknowledge the fact that. I believe that Head Start is the most comprehensive early child development program that we implement in this country. The fact that tribal leaders look to Head Start as that program that they want for all their children, certainly it warms my heart to hear that. I think it's a huge testament, not only to the high expectation and quality that we expect, but to the incredible work that our Head Start program directors and their teams do in implementing these programs around the country and overcoming the challenges that they face, whether it be geographic, whether it be economic. I think that speaks volumes to the incredible work that our programs do. I do want to acknowledge those directors and Head Start staff who are listening in right now on the amazing work they've done, especially over the last two years. To know that our Head Start staff have ensured that children and

families who need these services have not gone without a provider, it definitely speaks volumes to the commitment that they have to their community. So, I want to send a special thank you to all those folks.

Currently, we do not receive an appropriation specifically for facilities. We are able to support programs with facility projects, but that usually comes by way of, in most cases, unobligated balances from previous years. So those unobligated funds that were not used by programs around the country, instead of sending that back to the treasury, we try to make that available for what we typically call, one-time awards, just those needs that are outside of normal ongoing operations. So while we don't have a facility appropriation, I still do encourage those grant recipients who know that they have a facility need to start the planning process in terms of what you need and work with the Regional Office and your program specialist to develop a package and an actual request for one time funding to support that facility project, whether that is the purchasing of a facility, a major renovation, or the construction of facilities. We do find ways to support that without a specific appropriation for it, so I don't want you to feel like that is necessarily a barrier. So long as we get in a fundable request and we have the availability of funds, we do our best to support those projects.

**Todd Lertjuntharangool:** In terms of staffing and workforce, in talking to our Head Start programs, and just two weeks ago, having attended the NIHSDA Conference in Oregon, we know that the workforce is maybe our number one priority right now in terms of getting back to 100% operating capacity. And so we're really trying to be as impactful as we can with our tribal colleges and universities and broadening the availability of those courses to staff from Head Start programs around the country, and also really encouraging programs to look toward the future. When we talk about coming back to 100% operating capacity, it doesn't necessarily have to mean doing what you were doing before, but certainly ensuring that the design of your program is one that meets what that current need is and in some cases for some programs, that does mean redesigning your program, and in some cases, we've also found ways to benefit reallocating how we budget and even providing pretty significant salary increases for Head Start program staff around the country. We know that credentialing for Head Start certainly is something that the staff dedicate themselves to and we want to recognize them as professionals.

**Jennifer Webster:** Yes, I have a question. If you could help me understand for the eligibility criteria, how do you change those? Do you have to change them in the regulations? Do you have to have Congress? How is that done?

**Tala Hooban:** So, the eligibility criteria is an area we would need congressional support because it's in the Head Start Act, yes. I know, but we hear you. We do hear you.

**Todd Lertjuntharangool:** To add to that point really quick also to Councilwoman Webster's question, we also know that the Head Start Act certainly is up for reauthorization. And whether that's going to happen during this administration or not, we know that certainly it is overdue for reauthorization. We appreciate again, tribal leaders coming to Consultation, providing their testimony, and advocating so that when that time comes, those voices are accounted for in the laws that Congress passes related to Head Start and to the Head Start program. I, myself, can't speak to when it's going to happen but it could happen any time now.

### **Meaningful Consultation with Sovereign Nations**

#### ***Transcript from Testimony of Lieutenant Governor James Naranjo of the Santa Clara Pueblo***

**James Naranjo:** Good afternoon. James Naranjo, Lieutenant governor from Santa Clara Pueblo how's everybody? I hope you can see me. Good afternoon from Northern New Mexico. Just want to give my respect and blessings to all of you that are on the call, to the tribal leaders and all of you from the Office of

Head Start. I hope you're all doing well this summer. I have some talking points that I want to share with all of you. And so, what are the factors that make it easier to coordinate across early childhood programs and initiatives and develop stronger early childhood systems in tribal communities? Our first one is our common goals. The executive level supporting and understanding. Number three is communication and collaboration, the community support and financial stability.

We see that these are all important needs for our community. We come from a very small community. We roughly have about 3,400 members, and we live in three different counties. Our tribe is surrounded by three different counties, Santa Fe County, Rio Arriba, and part of Sandoval, and we're close to the Los Alamos National Laboratories. We're eight miles from that area. So, it makes it difficult to coordinate across programs and in initiatives for tribal communities. These might be legislative and administrative or other issues.

Differing educational goals amongst these entities. The mission and vision of many of these entities differ greatly in regard to early childhood education. Generalizing the mission of education entities, Santa Clara Pueblo seeks to build leaders through their excellent and relevant education. The State of New Mexico is currently occupied with equality, and the federal government programs of the Office of Head Start and the Bureau of Indian Affairs are concerned with the movement out of poverty and the self-determination, respectively. To eliminate poverty eligibility requirements for Head Start or to change the eligibility requirements from poverty to a living wage, Head Start and early childhood education across should be the federal trust responsibility for Indian Country. The current eligibility for Native American children entering Head Start programs are evaluated based on requirements, such as current eligibility, recruitment, selection, enrollment and attendance.

The ERSEA mandates the outline of the 2006 Office of Head Start. The performance standards of the 1302 sub part A, Office of Head Start in 2019, the ERSEA requirements do not take into consideration the general impacts of poverty and how the current eligibility policies frame the exclusion of some Native American children based on their family economic status. Current research of the OHS policies directly include the high-quality early childhood education as a strong indicator for changing the trajectory of minority children that fall behind academically generation after generation. An important consideration to alleviate continuous educational gaps is to eliminate the eligibility barriers defined by family's socioeconomic status in Native American children.

Equality in early childhood education is depending upon the assumption that all children of color come from families who share the same starting point, including the legacy of economic and education capacities. Warnfred Bunereau in 1986 to 1996 researched this very topic and found that because families experience the same economic conditions, race and culture and experience differently in minority families. What the OHS mandate does not consider is that even though minority families earning is at or above the poverty level guidelines and does not mean that they are able to significantly contribute enough to reverse the generational influence of poverty in their families.

Children's Defense Fund of 2012. It is therefore concluded that there are important steps to be taken toward eliminating academic equities to contribute the generalized poverty by reevaluating the ERSEA guidelines and removing the poverty level base for enrollment so that all children from families, especially Native American children, easier to equality early child education for the Head Start programs. I just wanted to share those talking points with you all and thank you for your time.

We will still have a public health order. We're still seeing a rise in our cases here in the village. So, it's been quite challenging for our people, for the members that want to come to our school that are still not allowed into our village because of this COVID pandemic. So these are just some of the challenges that we face and that we invite you to come back again to Santa Clara and see the progress and what we are doing when the restrictions are lifted for us, and that's always a plus for us, but it's been a challenge with the state because the state of New Mexico is offering Level 1 teachers a huge raise and so that's a financial burden on us, how to be competitive with all the surrounding counties and schools around our area. So, we just hope you take all these into consideration, and we appreciate all your help and guidance. And thank you and have a good day.

### **OHS Remarks and Response to Testimony: Lieutenant Governor James Naranjo.**

**Heather Wanderski:** Thank you everyone who has provided testimony. I will echo what Tala mentioned around the COVID response and just how it continues to have an impact on all of our communities for sure and has an impact on operations, also, recognizing and hearing very clearly that there is a desire for... reducing or eliminating barriers related to eligibility and changing those requirements for all tribal children. Right now, we don't have the ability at this point to be able to change up, but certainly have heard and HHS has expressed interest in knowing more. We have been sharing that information up to the Department to talk more about what that could possibly mean and answering their questions as best as we can as we've been hearing directly from you all through these consultations and through our ongoing communications with tribes.

**Todd Lertjuntharangool:** Facilities and around funding stream for facilities, I also want to thank tribal leaders for consistently coming to Consultation to voice their priorities, voice their concerns, because certainly on the federal side, we don't necessarily have that same voice and ability to advocate, so we know that our tribal leaders have a very prominent and important voice at the table in terms of those higher up folks here in the federal government and so we always appreciate the fact that you lobby and that you advocate for those things that are going to best serve kids and families in your communities.

In recent studies, we also know that 80 to 90% of brain development happens between the ages of zero to three, and so these are the folks with whom we trust our children during that time period. I know that we collectively want to invest in those folks and ensure that we recruit the best and we keep the best to nurture our children. The appropriation aspect is one that we depend on Congress for in terms of increases, but also just making sure that our programs are designed in a way that best meet the needs of children and families, but also allow us to operate at a high-quality level, and definitely the pay for staff is going to be at the top of that list. I do see Lieutenant Governor has his hand up, so I want to pause and turn it over to Lieutenant Governor, Santa Clara.

**James Naranjo:** Thank you, Todd. I just had a quick question in regard to that quality improvement budget. Is that something that can be allocated towards the Councilwoman's question towards the facilities or improvement of the facilities, or can you explain how that part of the budget can be utilized?

**Heather Wanderski:** Absolutely, there was a request for applications this year that included COLA and quality funding. The quality portion of the funds that were made available to all grant recipients can be used for very specific purposes based on the Head Start Act. And I think it's a total of nine, but absolutely one of them is related specifically to improving the environment of your facility. So yes, you can use the quality

funds that were awarded or intended to be awarded to you, as part of the application you can indicate that your desire to use that for the purposes of improving your facilities.

**Todd Lertjuntharagool:** One thing I will add to that over the last two years, our programs have had to pivot so often. The pandemic really, really kind of threw everybody for a loop, and operations, certainly wasn't what it normally is in a given year. And we know that our programs are going to be feeling that for some time to come. So, in addition to the quality money that the Lieutenant Governor had mentioned, we know that a lot of our programs that may have existing vacancies and sometimes longstanding vacancies with staff that they're going to potentially have funding that could be reallocated and applied to various needs such as a facility or renovation or major renovation. In some cases, we've seen some programs who have enough funds to re budget because of staff vacancies that they undergo some major renovations at their programs. So, I also want to make sure that folks are being considerate of the existing budget you have and any potential money that you have to maneuver there.

I did also want to circle back to a point that both Lieutenant Governor and Councilwoman Webster brought up, and that's around things like staff salaries. We work really hard with each program individually to try to make sure that we look at how they can better support staffing, and really every program is different in terms of the challenges that they face. We have some programs where we look at their budget, and there's really not a... frankly speaking, there's really not a penny to squeeze out of anywhere. There's are not many changes that can be made. Certainly, if they're fully enrolled. We know that the kids and families are there, and there's very little we can do short of applying for expansion and serving more kids and receiving additional funding to support that program and the implementation of it.

We also see a lot of programs as I said before, too, where sometimes it can be due to the eligibility criteria, sometimes it can just be due to fluctuation in the population where the same number of children and families may not be in the community. And what we know now is that to operate a... let's just say a Head Start classroom, one classroom with two staff that could support up to 20 children, you're talking in the neighborhood of about a hundred thousand dollars for a classroom. And so, we've also worked with a lot of programs where we underwent community assessments, and we underwent wage comparability studies. The outcome of those was that we determined that the same number of eligible children and families were not in the community, that staff certainly were not paid commensurate with what like positions within the community were. The tribe used those to make decisions on pulling back on the number of children in classrooms that they operated. In some cases, significant, I think it was something like two classrooms and the tribe made the decision to not operate those two classrooms and take the funding that would normally go to operate those classrooms and re-disperse those across their staff.

So, we also want to make sure that programs know that they do have the option to, if the community data supports it, come in for reductions and requests to maintain your current level of funding with justification for it. In some cases that has helped with staffing and with salaries. Again, I believe our Head Start staff are some of the most awesome people in the early child development community. Certainly, we want to pay them commensurate with what like positions in the community are. Kindergarten teachers, in most places, you could be talking \$40,000 or \$50,000 a year, some places higher than that. We want to support our Head Start programs in getting to a place where we're retaining the right people for those classrooms who are going to provide the highest quality of service to kids and families for years to come. I think one challenge that certainly does come with heavy rollover or turnover of staff is that experience factor.

So while we know that the schooling is certainly a high priority and the need to give a proper foundation, we also know the experience plays a huge role in it and if you have teachers that are only going to be in the



classroom for a year or two, they're not getting the time that they need to really build on their skill set and apply their craft the way that we normally would intend and hope for. So, retaining those staff is a huge priority for us, but I just wanted to say that before we moved on. However, we can support that, and however we can support tribal programs around the country, certainly we want to do that, so please do keep in touch with the Regional Office.

**James Naranjo:** This is Lieutenant Governor. I just want to comment on Todd's comments because that's exactly what we're seeing here in Northern New Mexico because... of course, a laboratory in New Mexico pays a higher rate of salary, and it's only 20-minute drive. And then if we have Santa Fe County, which is 30-minute drive, and then from there on there's maybe six, seven other Head Starts between Taos and Santa Fe, and so all the teachers, just like the casino, we're all fighting for that great teacher and we're all fighting for that great customer in order to keep our operations going and to retain our people. And so that's one of the biggest challenges we find.

I think we see that throughout the whole state and maybe throughout the whole country, but for us little tribes, that's what we have to do because we're not financially stable. We're financially fit in our culture and our ways and our language and our heritage, but we're not financially set with the almighty dollar. And so I thank you for bringing that up, Todd because that is one of the challenges that we see and that I hope we can just retain our teachers and so that we're all on the same level and we're not competing for one another. We're not competing for that teacher. Thank you.

**Tala Hooban:** Thank you for that. It's easy to forget that people are willing to drive for a couple of extra dollars. Are there any questions, last minute comments before we close out? All right. Well, I wanted to thank you, Councilwoman Webster and Lieutenant Governor Naranjo. It was really nice to hear your testimonies. We really do appreciate it. I do want to remind you all what Todd said about our August 15th Consultation in Spokane, Washington, and September 14th, virtually, if there were people that were unable to make it, and there will be two other opportunities, one in person in Spokane and one in virtually. We will work on getting the summary published for this Tribal Consultation. In 45 days, it will be posted in the ECLKC. I think that's all I have. And with that, Councilwoman Webster, will you close us out with a prayer?

## **Closing**