

**Request for Information:  
Office of Head Start Tribal Programs  
Summary Report**

**October 2024**

## **Request for Information: Office of Head Start Tribal Programs Summary Report**



### **Background**

On March 18, 2024, the Office of Head Start (OHS) published the [Request for Information: Office of Head Start Tribal Programs](#) (RFI) in the Federal Register. The RFI invited public comment on policy and current training and technical assistance (TTA) supports that are available to American Indian and Alaska Native (AIAN) Head Start programs. The Administration for Children and Families (ACF) and OHS are committed to the principles of nation-to-nation relationships and Tribal sovereignty. Therefore, engagement and consultation are essential to understanding the current challenges for accomplishing AIAN Head Start programming goals. Through the RFI, OHS solicited Tribal government and public comment to improve service quality.



## OHS REQUEST FOR INFORMATION SUMMARY REPORT

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A key purpose of the RFI was to provide an opportunity for OHS, Tribal nations, and stakeholders to work together to assess the current state of AIAN Head Start programs and identify opportunities for moving forward. The RFI was for informational and planning purposes with the potential to inform future subregulatory guidance (e.g., Information Memoranda and Program Instructions), TTA, and possible future regulation. OHS also hoped the RFI would help to strengthen relationships between OHS and Tribal nations while amplifying Tribal voices and promising practices from the field.

Specifically, the RFI asked whether existing rules, regulations, and available TTA are optimal for AIAN Head Start programs. The following topic areas were identified through past consultation, recipient feedback, and program data:

- **A. Eligibility**
- **B. Program Options**
- **C. Quality Environments**
- **D. Child Health and Safety**
- **E. Tribal Language Preservation, Maintenance, Revitalization, and Restoration**
- **F. Family and Community Engagement**
- **G. Investing in the Workforce**
- **H. Training and Technical Assistance for AIAN Programs**
- **I. Supporting Partnerships with State Systems**
- **J. Facilities**
- **K. Fiscal Operations and Management**
- **L. Early Childhood Systems**
- **M. Other topics**

Over the six-month public comment period, which ended Sept. 16, 2024, Tribal leaders, program administrators, teachers, staff, families, and other stakeholders engaged with OHS through virtual and in-person listening sessions, including the 2024 ACF Early Childhood Tribal Consultation on July 9–10, 2024 in Ft. McDowell, Arizona. OHS welcomed both oral and written testimonials in response to the RFI, including through email at [AIANheadstart@acf.hhs.gov](mailto:AIANheadstart@acf.hhs.gov) and the Federal Register.

In May and June 2024, OHS hosted two virtual listening sessions with a combined 45 stakeholder participants. Of those 45 participants, 25 unique AIAN Head Start grant recipients were represented. Participants included Head Start directors, enrollment coordinators, education managers, teachers, providers, other program staff, and a family member. Also in attendance were representatives from a national association, state programs, and community agencies.

During the 2024 ACF Early Childhood Tribal Consultation, OHS heard from Tribal leaders and their designees who provided feedback on topics outlined in the RFI. OHS also received 11 written statements from Tribes and Tribal stakeholders through the Federal Register and AIAN Head Start resource inbox. View the [comments](#) originally posted to the Federal Register [here](#).



## A Note from OHS

OHS is committed to continuously improving its practices in dialogue with Tribal nations through consultations and other forms of engagement. This RFI was published on March 18, 2024. Significant requirements, subregulatory guidance, and resources for AIAN Head Start programs were developed based on feedback received from Tribal stakeholders during the six-month public comment period, including:

- Program Instruction [ACF-OHS-PI-24-03 New Eligibility Provisions for American Indian and Alaska Native Programs](#)
- Guidance through [FAQs to support children and families experiencing homelessness](#)
- Final rule in the Federal Register, [Supporting the Head Start Workforce and Consistent Quality Programming](#)
- Information Memorandum [ACF-OHS-IM-24-03 Affirming the Use of Indigenous Knowledge to Meet Curricula and Assessment Requirements in American Indian and Alaska Native Head Start Programs](#)

Comments on the RFI may have been submitted before these changes and materials were made available to the public. OHS acknowledges that these new developments might not address every concern shared by Tribal stakeholders and that submitted comments under these topics are still being considered by OHS.

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## American Indian and Alaska Native (AIAN) Head Start Programs

Through the RFI process, OHS received valuable insights from Tribal stakeholders who expressed an unwavering commitment to the well-being of children and families in their communities. Tribes shared the ongoing and profound effects of colonization on their communities. Despite facing significant challenges, many Tribes are actively engaged in the preservation and revitalization of their culture and languages within Head Start programs. Tribal stakeholders highlighted the diversity among Tribes, each with distinct cultures, traditions, languages, and practices. Additionally, Tribal nations situated in rural or remote locations experience unique challenges, which can require more time, money, or labor-intensive strategies to access resources.



Commenters in the RFI process noted that the most effective solutions to challenges originate within the Tribes themselves. Tribal stakeholders emphasized to OHS that respecting Tribal



sovereignty and autonomy necessitates flexibility, trust, and continuous engagement through consultation.

## Key Themes from the OHS Request for Information

OHS invited stakeholders to provide input on the 12 topic areas outlined in the RFI, along with any other relevant issues they wished to address. This report is structured according to the 12 RFI topic areas with subthemes that naturally emerged from the different engagement activities. Some of the subthemes in this report align with those noted in the RFI while others surfaced as new, yet recurring areas of interest from commenters. OHS received many rich and insightful comments — each one was read and will continue to be considered equally. For this report, OHS provides a high-level summary of the key themes and subthemes that emerged from RFI engagements.

### A. Eligibility

Many Tribes and Tribal stakeholders expressed gratitude and praise for the new eligibility provisions for American Indian and Alaska Native programs, as enacted through the Further Consolidated Appropriations Act, 2024 (Public Law 118-47).<sup>1</sup> This change allows AIAN Head Start programs to exercise appropriate discretion in determining eligibility for services, regardless of income, thereby significantly expanding the number of children who can benefit from services.

While commentors are widely in favor of these new provisions, others raise some concerns with respect to implementation. One commentor acknowledges that while these new requirements increase the number of eligible children, it does not come with additional funding for AIAN programs. This commentor reminds ACF of the federal trust responsibility to support AIAN children and concern that a lack of available slots might encourage families to move outside Tribal communities. There were a few implementation questions raised with respect to these new provisions related to the intersection with selection criteria requirements, serving non-AIAN children, categorical eligibility, Program Information Report (PIR) reporting, and monitoring.

Another common theme with respect to eligibility pertained to housing insecurity. Some Tribes shared that homelessness, overcrowding, and substandard housing are big issues in Indian Country. However, the definitions and guidance around serving families experiencing homelessness do not often align with Indigenous cultural practices. As such, identifying those families can be difficult. One Tribe also expressed concerns about needing to attain third-party verification to adequately document a family experiencing homelessness.

Lastly, we received one comment that addressed the Tribal Temporary Assistance for Needy Families (TANF) Information Memorandum (ACF-IM-HS-23-01) guidance, as it was a relevant topic solicited for comment in the Tribal RFI. Due to the new statutory eligibility provisions for AIAN

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<sup>1</sup> On March 18, 2024, the Office of Head Start (OHS) published a request for information (RFI) in the Federal Register, [Request for Information: Office of Head Start Tribal Programs](#). Just a few days later, on March 23, 2024, President Biden signed into law provisions giving AIAN Head Start programs additional flexibility to serve children in Tribal communities. As such, the new eligibility provisions were not explicitly solicited as a topic in the RFI.



programs released on March 21, 2024, the 2023 Tribal TANF IM and guidance were rendered moot. However, commentors shared in retrospect that they had no comments on the Tribal TANF guidance because:

- The legislative change for AIAN eligibility likely diminished the need for programs to rely on the TANF IM
- Programs and Tribes likely did not have enough time to update their TANF plans to take advantage of the confirmed authority before the legislative change rendered an update unnecessary

Regardless, commentors shared appreciation for the proactive nature of OHS' actions to provide guidance on the TANF authority in response to eligibility concerns expressed by Tribal Head Start programs.

***Promising Practices:***

- Revise program selection criteria to award more points to children and families experiencing homelessness or receiving benefits from TANF, Supplemental Nutrition Assistance Program (SNAP), or Supplemental Security Income (SSI) to ensure the program is serving children most in need of services in light of the increased eligibility flexibilities.

***Key recommendations for the Office of Head Start:***

- Provide further TTA and resources to support implementation of the new AIAN eligibility provisions.
- Consider the same eligibility flexibility for programs served by U.S. territories and compacts.
- Provide guidance on the definition of homelessness to address the realities of those with housing insecurity in Tribal communities to account for nontraditional living situations such as extended kinship care and multigenerational households.
- Encourage the Secretary of the U.S. Department of Health and Human Services (HHS) to use his position and authority to educate and raise awareness about overcrowding and housing insecurity in Indian Country and advocate for increased resources to address these issues.
- Have HHS work with Congress and the Department of Housing and Urban Development to update the Head Start Act to better reflect the realities of homelessness in Tribal communities.

“We've been fighting for [eligibility] for many, many years, to be able to serve all of our Native children in our community and that's a reflection of the Tribal community's values. They want to serve all of the children because of the importance of connection and a sense of belonging.” –  
Ponca Tribe of Oklahoma





## B. Program Options

Current OHS regulations provide flexibility to programs to design a program structure that works for the community they are serving whether that is through center-based, home-based, family child care, or an approved locally designed option (LDO). Many Tribes and Tribal stakeholders shared that LDOs have been particularly successful to address the unique needs of Tribal communities, in large part because they allow for “autonomy to incorporate culturally significant practices, such as land-based education and intergenerational learning.”

Commentors expressed that OHS should continue to promote flexibility in program design while streamlining the approval process for LDOs, especially for small or rural programs that might face additional administrative burdens, such as limited staff and capacity to engage in the approval process itself. One commentor shared that they believe the biggest current impediment to using the LDO is likely the fact that Tribal programs do not know they can apply for a waiver to access the LDO. Another commentor shared that while LDOs can benefit from lower classroom ratios, this requires substantial additional investment in staffing and other resources.



While there may be some Tribal programs with the means and inclination to pursue such a program design, commentors shared that Tribal programs need clarification about whether they can request lower ratios using the LDO. In addition, assuming the LDO is the appropriate mechanism for such a redesign, Tribal programs need clarification on what classroom ratio-specific justification OHS needs to review and approve the programs’ proposed locally designed classroom ratio options.

Regardless of the program option, AIAN programs must deliver a range of comprehensive services, meet duration requirements, and design a program calendar that aligns with community needs. Many commentors shared that because of the importance of Tribal cultural hours, duration requirements are challenging to meet. They asked if Tribal programs can use LDOs to accommodate Tribal holidays or cultural events. One commentor shared, “Ignoring Tribal holidays in scheduling could strain relationships between Early Head Start programs and the communities they serve. Mandated hours that do not consider Tribal holidays may be viewed as a lack of respect for Tribal culture and traditions. This could lead to a perception that the Head Start programs are not culturally sensitive or supportive of the communities they serve.”

Commentors also shared that aligning program schedules with Tribal holidays could strengthen community bonds and show respect for cultural practices. Not observing Tribal holidays can impact



attendance and participation, and AIAN program staff may also need to take leave to observe these holidays, impacting program operations. A few commentors provided examples of cultural activities that could be considered as instructional hours, such as fish camp and berry picking excursions where children spend the afternoon learning proper Tribal protocols. Additional examples shared include annual Tribal celebrations or Powwows; historical commemoration days specific to the Tribe; seasonal festivals related to agriculture, hunting, or fishing; and religious ceremonies and observances unique to Tribal cultural practices. Given the diversity among Tribes, the total number of holidays varies. Some Tribes may observe only a few additional holidays beyond the federal ones, while others might have numerous cultural and religious observances.

Additionally, there were many comments and questions with respect to Change in Scope (CiS) reduction and conversion applications. Some commentors shared that CiS applications are often a lengthy process and there is some confusion about when it is necessary. For example, some Tribes expressed that programs are under the impression that they are required to complete and submit a CiS request to move slots between Head Start Preschool and Early Head Start.

***Promising Practices:***

- Using LDOs has been particularly successful to address the unique needs of some Tribal communities, in large part because they allow for autonomy to incorporate culturally significant practices, such as land-based education and intergenerational learning.

***Key recommendations for the Office of Head Start:***

- Allow programs flexibility and waiver authority to design calendars, curricula, and program service options that are reflective of the Tribe's practices and allow communities to fully and appropriately honor Tribal holidays or cultural events.
- Clarify the CiS application process and provide consistent communication about how it is applicable to AIAN programs.
- Streamline and expedite the CiS approval process.
- Provide guidance and TTA on how to apply for, design, and use an LDO.

“LDOs have been particularly successful when Tribal communities have the autonomy to incorporate culturally significant practices, such as land-based education and intergenerational learning. OHS should continue to promote flexibility in program design while streamlining the approval process for LDOs, especially for small or rural programs that might face additional administrative burdens, such as limited staff and capacity to engage in the approval process itself.” – Mathematica



## C. Quality Environments

### Assessing the Quality of Teacher–Child Interactions in Center-based Preschool Classrooms

Several Tribal stakeholders shared challenges with OHS’ approach to assessing classroom quality, particularly highlighting experiences with the Classroom Assessment Scoring System (CLASS®). Some stakeholders shared that the CLASS tool may not fully account for or reflect cultural nuances and Indigenous teaching styles. One Tribal organization expressed that low CLASS scores should not be used punitively against Tribes but instead seen as an opportunity for OHS to provide additional training and technical assistance to programs. While one Tribe shared appreciation that OHS accepts self-monitoring CLASS reports from Tribes, the cost of training and high turnover rates of program staff makes self-monitoring a challenge.



An additional challenge expressed by several Tribes and Tribal organizations is the lack of AIAN CLASS reviewers. Programs report that non-Native reviewers are unable to effectively assess teaching strategies in Tribal programs and lack experience to assess in Tribal contexts. Programs also emphasized a concern for how Native languages and culture are observed, noting that teachers are unable to deliver lessons for review in their Native languages. This is especially a challenge for language immersion programs.

#### **Key recommendations for the Office of Head Start:**

- Provide additional funding or resources to help cover the costs for AIAN Head Start program staff to become CLASS-certified.
- Reconsider CLASS as an appropriate tool to measure quality in AIAN Head Start programs.
- Hire AIAN CLASS reviewers to conduct assessments in Tribal Head Start programs.
- Affirm that programs can be assessed while using their Native languages.
- Stop the practice of entering Tribes into the Designation Renewal System as a consequence of low CLASS scores and instead provide additional training, mentoring, and support.

#### **Curriculum**

Tribal stakeholders emphasized the critical importance of involving elders, spiritual leaders, traditional leaders, community members, and other culture bearers in programs to pass on cultural knowledge to younger generations. Several Tribes shared innovative approaches to integrating their cultural and linguistic heritage within their Head Start programs. One Tribe developed a framework inclusive of the Early Learning Outcomes Framework (ELOF) and state early learning guidelines while also incorporating the Tribe’s own language and cultural standards. Another Tribe described





some success in introducing the **Making It Work: A Guide for Implementing Cultural Learning Experiences in AIAN Early Learning Settings** process to integrate traditional practices into their curricula. One AIAN Head Start organization shared their experience working with research partners to develop a nutrition curriculum supplement, ensuring customization for the seven Tribes served by the organization.

Many Tribes expressed that OHS' emphasis on evidence-based curricula, rooted in Western scientific paradigms, overlook the valuable insights and knowledge systems that have been developed by Indigenous people over generations. It was noted that the markers of quality will vary across programs, influenced by factors such as community values, resources, and priorities. Therefore, OHS should respond with flexibility and culturally responsive measures. Most programs shared the need for dedicated funding to develop culturally- and linguistically-reflective curricula as this process requires time and resources to bring together community members, elders, and other specialists. Several Tribes and stakeholders noted the need for more guidance, such as a framework, to support curricula development.

***Promising Practices:***

- Curricula that are inclusive of Native culture and language.
- Partnerships that enhance curricula development or adaptation.
- Integrating the Making It Work tool to support curricula adaptation or development.

***Key recommendations for the Office of Head Start:***

- Recognize that Tribes have the best understanding of what their communities need and the value of Indigenous Knowledge in determining curricula needs in Tribal Head Start programs.
- Dedicated funding to support the development of culturally and linguistically reflective curricula.
- Capacity-building technical support for adapting or developing curricula.

“OHS has introduced the "Making It Work" process to help programs integrate practices into curricula and align them with the Early Learning Outcomes Framework. However, implementing this process meaningfully requires significant resources, including staff time, community and Tribal leader involvement, and early childhood development expertise.” – Makah Tribal Council

## **D. Child Health and Safety**

Health, mental health, and safety are critical to maintain in Head Start programs to provide high-quality programming and comprehensive services to children and families. The Tribal RFI identified the following themes and recommendations in relation to child health and safety.



### Health Services Advisory Committee

Many commenters emphasized that they struggle to find volunteers for their Health Services Advisory Committee (HSAC) due to uncompensated work, lack of time due to other responsibilities, or disinterest to serve on the committee. A few mentioned that an internal HSAC is not needed as many clinical staff in programs already have recurring meetings regarding Head Start child health and safety priorities, so the HSAC is considered duplicative.

#### ***Key recommendations for the Office of Head Start:***

- Develop culturally appropriate materials that elevate the importance of mental health and incentivize mental health professionals to join the HSAC.
- Have OHS provide HSAC members with training to understand the new requirements and how it aligns with their job role.
- Update the Weaving Connections HSAC Toolkit to incorporate suggestions for overcoming scheduling conflicts between health and mental health professionals.
- Develop a stronger role for the Indian Health Services (IHS) in Head Start programs to address lack of mental health providers, increase data sharing, and provide mental health supports for children with disabilities.

### Mental Health Workforce Shortage

Many commenters noted there are difficulties finding mental health consultants due to a nationwide workforce shortage and high staff turnover.

“There is a crisis-level shortage of mental health professionals across our state and Tribes. There are not enough workers to handle the need... I am not sure how we can be expected to obtain a mental health consultant with such a shortage of mental health workforce.”

– Inter-Tribal Council of Michigan, Inc.

#### ***Key recommendations for the Office of Head Start:***

- Develop more collaboration between the broader Department of Health and Human Services to clarify ways that Tribes can incorporate mental health consultants into their programs.
- Provide targeted TTA to clarify the update mental health requirements in the final rule.

### Incident Reporting



One commenter suggested there is a lot of uncertainty around incident reporting and the process in Tribal Head Start programs. It was also mentioned that the length of the incident reporting process is too long, and duplicative as Tribal and State investigations may be concurrent.

**Key recommendations for the Office of Head Start:**

- Provide TTA around what incidents should be reported as well as clarify the reporting timeline.
- Expedite and streamline the incident reporting process.

**E. Tribal Language Preservation, Maintenance, Revitalization, and Restoration**

Many commenters shared the important role of Head Start programs in the transmission of Native languages to younger generations. Tribes emphasized their commitment to language revitalization despite some of the challenges faced by their communities. Some stakeholders noted that past U.S. policies have disrupted Tribes' ability to use and pass down their Native languages and thus, many Native languages have become lost or endangered. Commenters shared strategies they implement to maintain, revitalize, and preserve Native languages through their educational programs, including:



- Language apprentice program
- Developing a language manual for families
- Introducing Native language in staff meetings
- Creating language nests
- Adding language teachers in classrooms
- Establishing language schools
- Graduation ceremonies where students join in traditional song and dance

Some Tribes experience challenges in bringing elders and language bearers into classrooms, while one Tribe shared there are only a few language bearers left in their community. Many Tribes shared that Head Start curriculum requirements impede their ability to integrate Native language and other customs into programming. Another Tribe shared that Head Start policies and standards conflict with language preservation, such as the disallowance of CLASS observation lessons being delivered in the Tribe's native language.

**Promising Practices:**

- Language nests and language schools



- Native language teachers in classrooms
- Native language lessons and support for program staff
- Integration of language in programs and ceremonies that include students in Native language and dance.

***Key recommendations for the Office of Head Start:***

- Enhance resources and support for Native language preservation initiatives within Head Start programs.
  - Provide funding and technical support for Tribes to adapt or develop linguistically and culturally reflective curricula.
  - Provide funded opportunities for peer learning to support Native language revitalization and preservation.
- Support Tribal Head Start Native language goals by providing opportunities to involve language teachers and other cultural experts in programs.
  - Offer exceptions to standard teacher degree requirements for individuals who are Native language speakers and culture bearers.
  - Authorize Tribes to determine the requirements needed to be properly credentialed to teach in Head Start programs.
  - Provide funding for cultural and language positions in addition to classroom teaching staff.

“Some Tribal programs are fortunate to have Elders and knowledge bearers but many of the Tribes in the Bering Strait do not. One of our challenges is to try to preserve the culture and language that is left, but to also support the younger generations in developing their own cultural traditions.” – Kawerak Inc.

## **F. Family and Community Engagement**

Many commenters shared that Head Start family and community engagement requirements are not reflective of Tribal culture or family and community structures. Several programs shared that child-rearing in Tribal communities often includes noncustodial parents (e.g., grandparents, aunts, uncles, and elders), and that language in the Head Start Program Performance Standards, especially language regarding the parent committee composition, are not inclusive of Tribal kinship networks.

Several Tribes shared that the requirements of Policy Council and parent committees create additional barriers for programs, especially for smaller, remote programs where the population is



spread out geographically. One commenter said that there are natural ways families gather in Tribal communities, such as cultural events, seasonal celebrations, and ceremonies, and the Head Start family engagement expectations should be responsive to these practices. It was noted that Tribes already have systems of governance and the Policy Council requirement creates an unnecessary layer of governance and decision-making. Programs also noted that family and community engagement requirements should be updated to reflect the realities of working families who prefer to engage using alternative methods such as virtual meetings, text, or email.

***Key recommendations for the Office of Head Start:***

- Establish expectations for family engagement in AIAN Head Start programs that are flexible, supportive, and culturally responsive
- Expand the definition of “parent” to be more inclusive of noncustodial caregivers such as grandparents, aunts, uncles, and elders.
- Revise parent committee and engagement expectations to reflect cultural practices, diverse family structures, and values of Tribal communities.
- Provide clarification and guidance about who is permitted to serve on Policy Councils and parent committees.
- Develop training and resources inclusive of all family structures.
- Elevate examples of AIAN Head Start programs’ family and community strategies, especially those that include multigenerational learning and traditional cultural practices.
- Exercise flexibility with Tribal Head Start programs regarding policy council expectations and composition or eliminate the Policy Council requirement.



## G. Investing in the Workforce

Across all commentors, Tribes and Tribal stakeholders expressed how much they value their staff and the incredible dedication they bring to the children and families in their communities. Tribes and Tribal stakeholders shared that workforce shortages, inclusive of challenges related to both recruiting and retaining staff, are a huge burden on AIAN programs at large. OHS received many comments expressing the difficulty of finding staff with the right qualifications or credentials, and the challenges are compounded when considering competing wages with schools and other local employment opportunities. Additionally, many Tribes noted that they are located in rural or remote areas that can significantly limit the hiring pool.





Commentors shared that meeting staff qualifications and credentials is particularly challenging given their unique circumstances as AIAN programs. Many Tribes and Tribal stakeholders shared that current requirements do not account for cultural competencies or recognize non-Western education pathways, ultimately hindering recruitment and retention efforts. As noted by many commentors, Tribal Head Start programs are doing their best to grow their own teachers and professionals, but as many feel the Head Start staff qualifications hinder Tribes' ability to determine who is best to serve their programs. This is particularly strained at the education staff level, with stakeholders overwhelmingly citing the importance of elders and culture bearers within Tribal communities, who are often excluded from formal Head Start roles despite unique expertise, wisdom, and cultural contributions.

Tribal stakeholders explain that elders and culture bearers possess invaluable cultural knowledge, Native language, and traditional teachings that should be used to preserve language and cultural preservation, cultural connection, and continuity. Commentors shared that challenges with meeting staff qualifications and credentials are also experienced across other staff positions, such as transportation staff, because of the regulatory requirement that drivers must have a commercial driver's license (CDL). The process of getting a CDL has become harder in the last few years for some Tribes.



On wages and compensation, many Tribes and Tribal stakeholders shared that they feel the Head Start program is not funded at a level that is conducive to hiring. Some commentors note the increased wage requirements — published as part of the revised Head Start Program Performance Standards on August 21, 2024 — pointing out that without accompanying funds, many of AIAN programs will not be able to implement them. The standards could also strain Tribal resources and create intra-governmental conflict. While some commentors note the small program exemption for the wage requirements, they suggest it does not go far enough to support smaller programs and will result in reduced enrollment and

potential program closures.

Some commentors add that Head Start staff are not paid enough given the extensive nature of their jobs, which can mean juggling multiple roles such as teaching, cooking, cleaning, reviewing budgets, submitting grant applications, and driving buses. As a result, comments reflect that staff burnout has increasingly become an issue in many AIAN programs, and programs are wanting more mental health and wellness supports for their staff.

Additionally, commentors shared that many Tribal communities suffer dire housing shortages. Many of these communities also face high costs because of inflation in rural areas or proximity to



urban centers. Sometimes, teachers cannot afford to live where Tribal Head Start centers are located.

***Promising Practices:***

- Low staff to child ratio has proven to be very beneficial to staff, especially since COVID-19.
- Updating job descriptions to add the value of cultural knowledge and language in Head Start positions.
- Supporting mental health issues via sweat lodges.
- Increasing flexibility in teacher qualifications to respect and recognize Tribal sovereignty.
- Continuation of the Tribal Colleges and Universities Head Start (TCU-HS) Partnership Program.

***Key recommendations for the Office of Head Start:***

- De-emphasize credential and degree requirements for Head Start teachers and allow flexibility to value unique expertise, wisdom, and cultural contributions to increase Native speakers and elders' roles in the classroom.
- Provide a transparent waiver process for hiring staff who do not meet degree requirements but are essential for cultural and linguistic instruction.
- Work with Congress to get additional funding to allow AIAN programs to offer salaries and benefits comparable to those in the K–12 system.
- Continue to support the “Grow Your Own” approach to staffing, including through the TCU-HS Partnership Program.
- Explore alternative pathways for Tribal or state certification under the “equivalent coursework” language in the Act.
- Provide guidance on when staff housing is an allowable cost.
- Work with the Child Development Associate (CDA®) Council to develop a pool of CDA observers who are willing to travel to Tribal Head Start programs, and improve CDA apprenticeship opportunities so programs can home-grow their staff.
- Provide guidance on how programs can use smaller vehicles, such as vans or mini buses, which do not require a CDL to operate.

“A waiver for Tribal members and elders that acknowledges the great wealth of language, cultural, and lived experiences that they bear would be more appropriate for filling these positions... Parents and community members will be more likely to volunteer and participate in Head Start activities when they see familiar faces in teaching roles.”



– Mississippi Band of Choctaw Indians

## H. Training and Technical Assistance for AIAN Programs

Many Tribes emphasized that TTA provided to AIAN Head Start programs should be culturally responsive and delivered with respect for Tribal sovereignty and the individual priorities and cultural practices of each Tribe. TTA providers should bring knowledge of Tribal governance structures. Commenters added that to establish trust and effectively engage with Tribes, TTA providers should seek to understand the historical and contemporary challenges faced by each Tribal community. Commentors also noted that TTA should include an ongoing relationship between Tribes and the TTA provider and not just be a one-time occurrence. One Tribal stakeholder expressed satisfaction with some of OHS' current TTA approaches, including the facilitation of monthly office hours, involving stakeholders in TTA planning, and OHS participation in professional conferences throughout the year.

Several commentors noted the need for culturally relevant training and resources, where content is tailored to AIAN Head Start programs. Tribes and Tribal stakeholders shared that OHS materials are developed at the national level and not with Tribes in mind, creating implementation challenges for AIAN Head Start program directors. Other commentors added the need for Tribal stakeholder collaboration in resource development.

It was also recommended for OHS to create a resource webpage solely for AIAN programs to improve access to relevant materials.

Many commenters suggested the need for an enhanced, dedicated TTA system for AIAN Head Start programs with an increased investment in specialized training and technical assistance designed for AIAN Head Start programs. Some stakeholders encouraged a new TTA center



dedicated to Region XI, allowing for culturally specific supports and resource development. Establishing geographically based TTA providers was also suggested to ensure a deeper understanding of the regional landscape. Commenters emphasized a need for dedicated AIAN TTA subject matter experts, specifically noting the need for expertise in areas such as disabilities, facilities, and fiscal matters. Several Tribes also expressed the benefit of peer-learning opportunities.



Some Tribes shared challenges with the quality of support they currently receive from TTA providers. One Tribe commented that requesting TTA is overly complicated, and another Tribal stakeholder shared they experience regular delays in receiving requested TTA services. An additional Tribe emphasized that increased follow-up by TTA providers is needed to support ongoing implementation after initial TA events.

***Promising Practices:***

- Including Tribal stakeholders in OHS' TTA planning
- Monthly office hours and other opportunities for peer sharing and learning
- Dedicated AIAN TTA staff who provide culturally responsive, Tribal-focused support and resources.

***Key recommendations for the Office of Head Start:***

- Enhance OHS' current TTA for AIAN Head Start programs:
  - Support communities of practice or other peer learning opportunities for Tribal Head Start grant recipients to share strategies and problem solve.
  - Expand the current TTA workforce to provide more individualized support to Tribal programs.
    - Provide ongoing support to programs, including a variety of approaches such as online meetings, chats, focus groups, and on-site visits.
    - Increase the support for family service professionals, decreasing the caseload of TTA providers.
  - Prioritize creating TTA materials with content specific to Tribal programs.
    - Create a Tribal resource development team to produce culturally relevant materials in collaboration with Tribal stakeholders.
  - Introduce an evaluation component to the TTA that is provided to Tribal Head Start programs that includes items about quality, quantity, and timeliness of the TTA that was provided.
  - Add dedicated AIAN subject matter experts to provide more specialized support on topics such as facilities, fiscal matters, and disabilities.
  - Ensure TTA providers are knowledgeable about Tribal Nations and can provide dedicated, culturally responsive support to AIAN Head Start programs.
    - Provide tailored technical assistance and resources that reflect the unique family structures and cultural practices within Tribal communities.
  - Simplify the TTA request process and promote ongoing relationships between TTA providers and AIAN Head Start programs.
  - Elevate and share examples of promising practices of AIAN Head Start programs with other Tribal programs.
- Provide targeted training and guidance to AIAN Head Start programs on the following topics:



- Trauma-informed care, including:
  - Addressing trauma experienced by staff and families, trauma triggers, and resources on how to create supportive, healing environments for children and families affected by trauma
  - Effects of historical trauma, substance abuse, and mental health challenges
- Early brain development
- Disability law
- Incident reporting
- Facilities design
- Waiver applications

“...we urge increased investment in specialized training and technical assistance curated for AIAN Head Start programs. This assistance should not vary from center to center based on each center’s program specialist. Likewise, we urge ACF to issue additional guidance to address common questions like incident reporting, facilities design, and waiver applications.” – The Port Gamble S’Klallam Tribe

## I. Supporting Partnerships with State Systems

### Alignment Between Tribal Programs and State Head Start Collaboration Offices

A few commenters noted that there is a lack of a relationship and alignment between Tribal Head Start programs and their state Head Start Collaboration Office (HSCO). A lack of staffing in the **Region XI HSCO** makes it more challenging to coordinate needs across the 26 states that are represented. It was also reported that programs are contacted infrequently by their HSCO. It was suggested that the lack of a relationship presents the impression that they do not care about hearing from Tribal Head Start programs. Programs have also reported their frustrations with needing to educate state HSCOs about Tribal sovereignty.

#### ***Key recommendations for the Office of Head Start:***

- Require all HSCO staff to complete ongoing cultural competency training to better understand the unique needs and priorities of Tribal communities.
- Require all HSCOs to schedule frequent meetings with Tribal leaders to identify challenges, best practices, and collaborative activities.
- Develop a HSCO–Tribal Head Start collaboration to advocate for the alignment of state and federal policies that impact Tribal Head Start programs.





- Provide additional support for the Region XI HSCO director by increasing staffing, funding, and TTA.

### Supporting Children with Disabilities

Several commentors noted there are concerns with the delivery of and access to services for children with disabilities. State and local education agencies are stretched thin and take a long time to process requests for Individualized Education Plans (IEPs). One Tribal Head Start program reported that it took an entire year for one child to obtain an IEP through their local education agency.

“Referrals through local education agencies take a notoriously long time to process. Some local education agencies have resorted to telling parents that if they want services they need to enroll their children in the local education agency’s early childhood program.”  
- National Indian Head Start Directors Association (NIHSDA)

One commenter shared there is also a lack of a workforce to meet the needs of children with disabilities. Some commentors noted the importance of providing TTA for facilitating partnerships and collaborations with state systems to improve the educational environments for Tribal children with disabilities.

#### ***Key recommendations for the Office of Head Start:***

- Develop a memorandum of understanding (MOUs), with Tribal consultation, with states for providing disabilities services to Tribal Head Start programs.
- Develop TTA on building partnerships with state systems for providing disabilities services for Tribal Head Start programs.

### Collaborations for Information Sharing

One commenter suggested that they only hear from their HSCO when receiving requests about information gathering. Information-sharing systems need improvements to ensure Tribal sovereignty and confidentiality between Tribal Head Start programs and states. One commenter noted that while they have very little engagement with their state system, they appreciate receiving information when deemed relevant to share with their center.

#### ***Key Recommendations for the Office of Head Start:***

- Develop a model data-sharing agreement, with Tribal consultation, for HSCOs and Tribal Head Start programs.



### Difficulties Accessing Providers with State and Local Education Agencies

One commenter noted they are having difficulties accessing providers for AIAN Head Start programs as there are a lack of providers to serve children with disabilities in local education agencies (LEA). One commenter noted that there are fragmented and limited funding sources between programs, making it difficult to coordinate services. Competing for limited resources could also lead to reluctance to collaborate between programs. One commenter emphasized there are difficulties for AIAN Head Start programs in aligning their services with state systems, especially when integrating early childhood education with state-funded public pre-K. Another commenter emphasized that state requirements present barriers for Tribal Head Start programs in integrating language revitalization into curriculum.

#### *Promising Practices:*

- In Washington state, they are discussing the development of a network of paraprofessionals in Tribal child care and Head Start programs to offer services.

#### *Key Recommendation for the Office of Head Start:*

- Provide funding for Tribal Head Start programs to incorporate their own providers instead of relying on MOUs with LEAs.
- Coordinate with the Department of Education to incentivize LEAs to work with Tribal Head Start programs.
- Facilitate coordination through a collaborative agreement between state systems and Tribal programs to mitigate unnecessary barriers in administering high-quality services.

## J. Facilities

Facilities are an ongoing challenge for AIAN programs, and many commentors expressed the need for more targeted assistance, support, and funding. As one commentor shared in an OHS listening session, “I will never attempt to do a facilities application. It is just too much.”

Tribes and Tribal stakeholders talked about the facilities application process — also known as the 1303 application — and expressed that it is a highly uncomfortable issue for many directors who may not have subject matter expertise on construction and related fiscal processes. Commentors shared that addressing this concern is particularly important for Tribal programs because of the magnitude of aging facilities that are in need for significant repairs, and for some, the need for fully new construction.



Environmental hazards, such as lead in water and paint, have also disproportionately affected many AIAN communities. One commentor suggests partnering with the IHS to expand regular assessments. The federal law authorizing the Head Start program requires HHS to submit reports to Congress on a scheduled basis. Every five years, HHS submits to Congress a report on Head Start facilities specifically used by American Indian and Alaska Native agencies. Multiple commentors shared that while folks have a sense of the state of AIAN Head Start facilities because of these reports, a professional survey, inclusive of all facilities instead of just a sample, would be needed to ensure a complete and accurate picture of the data.

Commentors also shared that some of the facilities challenges faced by Tribal programs are beyond their control. This includes challenges relating to connectivity and technological infrastructure, which can be challenging in remote and rural locations, and places that experience recurring challenges with inclement weather. It also includes those programs with facilities located on trust land that results in complex business site lease requirements. Across the board, commentors shared that a lack of additional funding to address these challenges make improvements more challenging, especially when considering increasing costs and inflation post-pandemic.

In recognition of the myriad challenges AIAN programs face in the facilities space, many commentors expressed the need for more specialized assistance to support such the facilities application process, facilities management, regular facility assessments, and compliance with safety and maintenance. One commentor also pointed out that the rigidity and administrative complexity built into the facility funding process, in addition to misalignment with the construction guidelines with the Child Care Development Funds (CCDF), prevents progress.

Lastly, when thinking about the unique issues related to facilities in AIAN programs, commentors expressed the need to decolonize facilities. One commentor shares, “The American child care environment is inherently a product of a Western philosophy. We sometimes do not even realize the extent to which colonization has crept up on us and infiltrated all aspects of our lives. For example, one of our Tribal Head Start programs reported that, in designing their center’s playground, the design team defaulted to swings and similar American playground features. They then challenged themselves to think about the ways that pre-contact Tribal children would have played and to design a play area consistent with that tradition.” Tribal stakeholders shared that OHS should offer greater flexibility in facility requirements, enabling programs to prioritize culturally relevant design elements and outdoor learning spaces. Outdoor programming, including using lands in the community, is incredibly important.

### ***Promising Practices:***

- Use outdoor programming and create spaces outdoors where children can gather and learn about the world around them.
- Increase inclusion of culturally relevant elements such as animals, plants, water, and local imagery into buildings and landscapes.



- Use one-time funds or other resources to support a project manager to help with facility application development.
- Design for calm environments that reduce stress for children. This includes being able to dim facility lighting to help minimize triggers for light sensitive children and incorporating quieter toilets to improve potty training for children with anxiety and those with fear of loud noises.

***Key recommendations for the Office of Head Start:***

- Provide a dedicated person on TTA staff who can support facilities applications.
- Conduct a comprehensive survey or report of all AIAN facilities to understand the full landscape of facility needs.
- Increase flexibility in facility requirements.
- Establish set-aside funding for facilities.
- Provide support to address environmental hazards, such as lead and water in paint, which have disproportionately impacted AIAN communities.
- Partner with IHS to expand regular safety assessments.
- Provide guidance for how Tribal Head Start programs can proactively address facility issues.
- Support during the design and budgeting processes would help ensure that new Tribal facilities do not later need to be expensively retrofitted to address an emergent environmental challenge.

“The American child care environment is inherently a product of a Western philosophy. We sometimes do not even realize the extent to which colonization has crept up on us and infiltrated all aspects of our lives. For example, one of our Tribal Head Start programs reported that, in designing their center’s playground, the design team defaulted to swings and similar American playground features. They then challenged themselves to think about the ways that pre-contact Tribal children would have played and to design a play area consistent with that tradition.” – National Indian Head Start Directors Association (NIHSDA)

## **K. Fiscal Operations and Management**

### **Nonfederal Match Requirement and Funding**

Several commenters emphasized that the 20% nonfederal match requirement creates financial and administrative burden for AIAN Head Start programs that have limited resources. Many Tribes face higher poverty rates relative to the national average, justifying a need for additional support rather



than financial contribution. It was noted that it is inappropriate to ask Tribes to pay to participate in Head Start programs as the federal government has an obligation to provide Tribal children with an education. One commenter said that the 20% federal match may have worked during the inception of the Head Start program, but it creates many barriers for programs now that rely on in-kind donations.

Tribes shared they have been impacted by inflation over the last few years and the pandemic creating a bottleneck for Tribal programs, with many still recovering. Tribal programs are also located in areas that are adversely impact by natural disasters, incurring costs and making it difficult to bounce back financially. A lack of parental involvement in volunteering also presents more difficulties to meet the 20% match, especially if the Tribe is unable to give a cash match and relies on in-kind donations.

AIAN Head Start programs shared they face unique challenges that justify that the Secretary’s authority to waive the 20% federal match requirement, as mentioned in the Head Start Act. The nonfederal waiver process, while meant to help programs, presents several barriers in the complex and intensive application process.



There is also no guarantee that the waiver will be approved, which presents uncertainty to programs. Lastly, it doesn’t make sense for AIAN Head Start programs to adhere to the 20% nonfederal match when they are struggling to overcome a workforce crisis.

“Tribal nations have limited resources and have to make difficult decisions regarding which programs to fund. Eliminating the nonfederal share match requirement would reduce facilities barriers for Tribes and allow our staff to focus on providing services to our children.” – Oneida Nation

**Key recommendations for the Office of Head Start:**

- Provide AIAN Head Start programs with waivers for the nonfederal match, as needed.
- Streamline waiver process and offer guidance on how to seek alternative funding sources or in-kind donations for the 20% nonfederal match.





- Provide Tribal Head Start programs with guidance and standardize the process on available waivers.
- Ensure that the Secretary’s waiver authority is not limited by statute.
- Eliminate the nonfederal match requirement for AIAN Head Start programs.
- Increase AIAN Head Start funding and implement a statutory waiver of all cost match requirements.

### Processes for Financial Changes to Grants

Some commenters noted there is confusion around processes for financial changes to grants, specifically for budget modification and carry-over requests. The complexity of the fiscal structure also makes it difficult to incorporate the program design into the larger regional Tribal consortia nonprofit structure that some states may have. The repeated reviews and reports required by OHS are burdensome, especially when an agency has the capacity to do fiscal management internally. There are inconsistencies with how grant specialists manage their grants, and the federal government should adhere to the same standards as they hold Tribal leaders and directors. A commenter also noted that timely award letters from OHS are important as delays suspend activities and operations for agencies.

“...the complexity of the Head Start fiscal structure makes it very difficult to incorporate this program into the larger regional Tribal consortia nonprofit structure we have in Alaska. Our finance department is more than capable of planning, tracking, expensing, and reporting on funding, something we do for many other federal agencies. The repeated reviews, reports and revisions specifically required by Head Start grants are highly burdensome and fiscally unnecessary.” – Association of Village Council Presidents

### ***Key recommendation for the Office of Head Start:***

- Aggregate and disseminate guidance on common process questions.
- Produce flow charts and other visual aids to convey information about financial operation processes.
- Develop checklists and other types of templates to assist programs in satisfying fiscal requirements.
- Develop a fiscal task force to help programs that need assistance.

### **Administrative Cost Limits**



Some commenters emphasized that the 15% administrative cost limit is difficult for AIAN Head Start programs to meet and there should be flexibilities provided. Tribes should be able to determine the nonfederal share as an option, as opposed to a mandate.

***Key recommendation for the Office of Head Start:***

- Produce a flexibility in how to calculate administrative costs or automatic waivers for small and rural programs that have financial needs.

**TTA on Fiscal Management**

OHS programs would benefit from TTA on fiscal management specifically focused on budget planning, grant writing, and financial supporting.

***Key recommendation for the Office of Head Start:***

- Develop TTA that supports AIAN Head Start programs to build stronger foundations in the financial regulations to ensure compliance.

**Cost of Living Adjustment (COLA)**

Some commenters noted that AIAN programs should not have to submit a request for COLA that is not in excess of the amount set by Congress. COLA payments were not helpful for raising wages for AIAN Head Start staff.

***Key recommendation for the Office of Head Start:***

- Discontinue the COLA application requirements.

**Head Start Enterprise System (HSES)**

One program emphasized that navigating the Head Start Enterprise System (HSES) is challenging and confusing for programs.

***Key recommendation for the Office of Head Start:***

- Advertise the helpline and develop training videos for navigating HSES.

## **L. Early Childhood Systems**

### **Braiding Funding Streams and Partnerships**

Tribal programs recognize the importance of aligning services to meet cultural and community values to support families. More than half of commenters reported difficulties braiding funding streams and establishing partnerships that support Tribal children and families. Commenters reported there are differences in guidelines between the CCDF and OHS, such as differing degree requirements, pay disparities among similar positions, and regulations. There are also difficulties collaborating with other early child development programs due to different standards and funding



streams. Head Start systems also have different rules than other early childhood specialist partners, which causes an unwillingness to collaborate.

***Key recommendations for the Office of Head Start:***

- Produce and release a crosswalk of the Head Start final rule with the CCDF regulations.
- Increase OHS participation in Tribal Early Learning Initiative (TELI) programs.
- Develop a working group between OHS and early child care to improve integration and implementation of TELI through AIAN Head Start programs.

**TTA for System Building and Developing Relationships**

One commenter emphasized that TTA supports system building and promotes developing relationships. Additional TTA would also support program staff in cultivating relationships with business organizations. TTA could help programs understand if an external partner is a good cultural match, such as demonstrating cultural humility and respect for partnerships with Tribal programs.

***Promising Practices:***

- A program reported positive outcomes and improved communication after co-locating their two Tribal programs.

***Key recommendations for the Office of Head Start:***

- OHS TTA and Office of Child Care TTA be on-site at the same time to maximize collaboration, communication, and ensure compatible requests are made of our AIAN Head Start programs.

## M. Other Topics

OHS gathered input on other topics that might fall outside of the 12 RFI topics. Below are some additional recommendations for OHS, as shared by Tribal stakeholders.

***Additional Recommendations for the Office of Head Start:***

- Demonstrate an increased commitment to the nation-to-nation relationship and honoring Tribal sovereignty.
- Waive federal review requirements for Tribes, including monitoring of classroom quality, as annual reports can demonstrate compliance with Head Start standards.
- Elevate Indigenous voices to be at the forefront of OHS decision making.
- Increase cross-cultural training of OHS staff, including content on Tribal governance structures and working with sovereign nations.
- Provide increased flexibility in the design and implementation of Tribal Head Start programs.
- Increase funding for Tribal Head Start programs, especially for facilities and workforce development.



- Streamline bureaucratic processes to reduce duplication in reporting and the administrative burden placed on Tribes.

## Looking Ahead

OHS is grateful for the collaboration and participation of Tribes and Tribal stakeholder groups in providing robust feedback on key Head Start topics that impact AIAN children, families, staff, and communities. The stories, experiences, and recommendations shared during the RFI engagements and in written comments offered valuable input on these topic and enlightened other areas needing attention, including how OHS can be a better partner to Tribal nations. It is OHS' goal to be responsive to Tribal communities and make informed decisions based on input from the field. Feedback across these critical Head Start topic areas serves not only to reflect current challenges and opportunities, but also to guide future actions by OHS, including improving guidance and support for AIAN Head Start programs.

OHS looks forward to gaining a deeper understanding of the issues raised by Tribal stakeholders during the RFI process and will continue to provide engagement opportunities for more focused conversations on these topics. OHS is committed to finding solutions both in partnership and consultation with Tribes.

Although the RFI period has ended, OHS encourages stakeholders to reach out with any questions or additional feedback by email to [AIANheadstart@acf.hhs.gov](mailto:AIANheadstart@acf.hhs.gov). Current grant recipients can also contact their regional program offices.

