

DAS Katie Hamm
Office of Early Childhood Development
Administration for Children & Families
370 L'Enfant Promenade, SW
Washington, DC 20447

RE: Comments of the National Indian Head Start Directors Association for the ACF RFI on Technical Assistance for Early Childhood Development Programs in Tribal Communities

Dear Deputy Assistant Secretary Hamm,

On behalf of the National Indian Head Start Directors Association (NIHSDA), I am pleased to submit the following comments in response to the Administration for Children and Families' (ACF) Request for Information (RFI) on "Technical Assistance Needs and Priorities on Implementation and Coordination of Early Childhood Development Programs in American Indian and Alaska Native (AI/AN) Communities," published on March 22, 2022 (87 Fed. Reg. 16195). NIHSDA has served as unified advocacy voice for AI/AN Head Start programs for over 40 years. During that time, we have developed a wealth of institutional knowledge regarding early childhood education in tribal communities and welcomes the opportunity to work with HHS to improve coordination around early childhood development in Indian Country.

As an initial matter NIHSDA would like to thank you, DAS Hamm, and ACF leadership for granting our request for a 30-day extension of this RFI. Training and technical assistance (T/TA) is essential to the operation of early childhood development (ECD) programs, of which AI/AN Head Start is a pivotal component. We see this RFI as an opportunity to meaningfully improve the provision of these services to the benefit of AI/AN Head Start, and ECD programs generally, and the additional time was key to the development of these comments.

I. Background on AI/AN Head Start

AI/AN Head Start is a vital contributor to early childhood development in tribal communities. Currently, AI/AN Head Start and Early Head Start serves 23,208 children in 154 programs across 26 states. Our programs are unique in that they tend to be situated in rural areas often affected by hardships such as poverty, high rates of crime, limited or non-existent transportation networks, and limited financial and qualified personnel resources. AI/AN Head Start strives to address these challenges through a holistic approach that provides educational, health, linguistic, and cultural services for our students, families, and communities. In this way, we foster vibrant and safe learning environments for early childhood development with lifelong benefits.

Yet despite AI/AN Head Start's long history of providing critical services to tribal communities, only about 49% of the eligible AI/AN child population is enrolled in AI/AN Head Start, and over half of all federally recognized tribes do not have access to a program. Of those tribes that have programs, many face significant hurdles in providing adequate classroom facilities, meeting the federal in-kind contribution requirement, and overcoming culturally inappropriate evaluation metrics. These challenges have been strained by the effects of the ongoing pandemic at the same

time that new stressors have arisen, particularly in workforce development and baseline funding inadequacies. Strengthening and expanding programs is paramount to AI/AN Head Start's continued success in meeting the needs of Native children, families, and communities.

II. Response to RFI

We believe that T/TA has the potential to enhance the quality of ECD programs when appropriately engaged as a tool for supporting program staff and operations. In practice, however, T/TA access is limited—both by unwieldy timeframes associated with requests for assistance, and by limited availability of specialists and awareness of their services. More must be done to align the intended purpose of T/TA (in supporting programs) and its actual usage by program staff. It is our genuine hope that ACF will consider and act on our comments in ongoing and future efforts to provide T/TA to tribal communities on early childhood education and development systems.

A. What are the key topics or areas where tribal communities want or need TA or support to effectively implement or coordinate tribal early childhood programs?

Foundations Need Support. As a core matter, T/TA on the foundational terms, processes, and available support services around the Head Start program is needed. A shocking number of AI/AN grantees reported to us that they were not aware of the specialty T/TA provided through ACF, nor even of the name of their local T/TA provider. Others also noted that fiscal/administrative grant management support was severely lacking due, in part, to the lack of communications from providers. This is deeply concerning as T/TA is a critical component of Head Start and ECD program implementation essential to preventing small challenges from developing into large problems or even crises. It also represents lost opportunities for program growth through the collaboration of program staff and T/TA providers. It is difficult for certain programs to be able to offer meaningful recommendations on additional areas where T/TA would be beneficial when the foundations are still so keenly in need of reinforcement. We urge ACF to direct its T/TA providers to communicate proactively and regularly with their grantees. This should begin with the offering of 101-type webinars or trainings on the ECD programs under their responsibility.

Improved Program Directors Orientation. Strengthening the orientation sessions provided to new program directors was identified as a top T/TA priority among AI/AN Head Start grantees. With staff turnover at alarmingly high rates due to the effects of pandemic stressors, low compensation, and other administrative challenges, it is imperative that T/TA providers stay on top of orientation sessions. Yet, many voices that we heard shared that orientations were either entirely lacking or inadequately detailed to prepare them for the many demands of these leadership positions. ACF should issue guidance to all T/TA providers on expectations around program director and leadership staff orientations with accountability mechanisms in place to ensure compliance.

Behavioral Training. The pandemic has exacerbated the unmet needs for behavioral and mental health specialists in ECD. Children who were already facing significant stressors such as homelessness, family fractionation, food insecurity, academic challenges, and more, must now contend with the additional layered on effects of the ongoing pandemic. Despite the reopening of society, the pandemic is not over. In addition to waves of variant outbreaks ECD programs must begin the heavy lift of catching students up in academics while simultaneously addressing the

trauma of the past two years internalized by students. Our staff do not have the training nor the capacity to handle this type of critical care. We urgently need behavioral and mental health T/TA that is targeted to the children we serve *and* our staff, who have also endured significant hardships.

Language Preservation and Integration. The traumatic effects of the federal government's historic policies of cultural assimilation and tribal termination are manifest across Indian Country today. Native languages and customs were targeted for extermination to such an extent that in many tribal communities these practices—these sources of identity—have been lost. AI/AN Head Start has long served as the frontline in the revitalization of Native languages and cultural practices. Through support for AI/AN Head Start children new generations are being raised in their ancestral lifeways and are resurrecting those practices for their families and whole communities. T/TA for ECD programs in tribal communities must account for Native language integration. This should include both retaining Native T/TA providers, those with experience working with tribal populations, and close coordination with traditional knowledge keepers around services.

Constructive T/TA Support. T/TA is a broad topic. At times it may refer to assistance with standard form completions, at others it may refer to addressing sensitive behavioral situations, while still in others it may refer to professional development trainings. An area that needs additional attention from the ACF is that of constructive T/TA program support. By this we mean T/TA services that assist programs in conceptualizing and drafting certain plans, rather than instructing them how to do it. The former is a collaborative process that reflects a give-and-take between the program and the T/TA provider. Oftentimes tribes do not have the resources to hire specialists for this type of work, vital though it is to program operations. Hands-on, customized T/TA will result in long-term benefits for tribal communities. We believe such constructive support falls within the reasonable portfolio of a T/TA provider and should be strongly encouraged.

B. What is the ability and capacity of the current federal early childhood TA system to support tribal communities in the areas where TA is needed?

Improved T/TA Ratio. Ideally, the ratio of T/TA provider to programs served should remain low in each geographic area (which we recommend coincide with the regional offices of the Bureau of Indian Affairs). It is our understanding that in the past T/TA providers have been responsible for up to or exceeding 30 programs. There is simply no way that a provider can timely meet the needs of such a large pool of programs with the requisite attention that each matter demands. Growing the T/TA workforce to alleviate such pressures is a fundamental first step to supporting the effective implementation of tribal early childhood programs. The providers should also be trained in cultural competency and bias awareness to come in ready to work effectively and respectfully with tribal governments. The more that these trainings can be tailored to the region and/or specific tribe that a T/TA provider will be working with through the collaboration of tribal leaders the more successful they will be. This should include holding "cluster" T/TA wherein other programs in an area are invited to attend any general training being offered in-person in the region.

Break Down Federal Silos. The ability of the current federal early childhood TA system to support tribal communities is greatly hindered by the *de facto* administrative siloes that exist across the federal government and within agencies. For example, the Head Start, child care, home visiting, and special education programs are each administered by ACF but subject to different performance

and regulatory standards, as well as T/TA processes. While some of this variation is certainly necessary to meet the specific needs of the children being served, in many instances requirements that are of general applicability are duplicative or even contradictory in nature creating heavy administrative burdens for grantees. It can be a nightmare for tribal governments to differentiate allowable costs and services across these overlapping funding streams.

We recommend that ACF develop internal guidance for "braiding" funding streams across its ECD programs. Such guidance should not only identify in one place all of the myriad ECD services oriented towards tribal communities (to serve as a reference tool for tribes), but also authorize the streamlining of program requirements to the greatest extent possible in exercise of the ACF Assistant Secretary's and HHS Secretary's administrative powers. ACF should also work with sister agencies providing ECD services—including the Bureau of Indian Education (Family And Child Education)—to identify ways to break down barriers across departments.

C. What is the ideal structure of a TA network to provide support to tribal communities around implementation and coordination of early childhood programs and systems?

Support Tribally Responsive T/TA Plans. The ideal structure of a T/TA network to provide support to tribal communities around ECD systems is one that is tribally-directed. By this we mean a structure that puts responsiveness to tribal capacities, priorities, and needs first. Too often, we have encountered instances where a T/TA plan is helpful at the beginning but later is inflexible when the time for amendments to adapt to changed circumstances arises. Tribes must be the driving force behind T/TA plan preparations and revisions. This is consistent with tribal sovereignty and the right of tribes to exercise self-determination over Indian education.

Geographically Situated T/TA Specialists. AI/AN Head Start and Early Head Start programs are spread throughout the country serving Native children in geographic locations as varied as the Grand Canyon, Great Plains, Great Lakes, and the Gulf of Alaska—to name but a select few. Each of these areas is home to unique tribal communities with distinct cultural practices that shape their local system of early childhood services. Knowledge of and flexibility with each tribe's cultural practices and governing structure is key to successfully implementing ECD T/TA, as with any federally-administered program in Indian Country.

Currently, however, T/TA specialists are not assigned on a geographic basis. They are rather generally assigned in a way that appears to be designed to avoid potential conflicts of interest between a T/TA provider and specific program. While we appreciate the ACF's well-intentioned caution, the effect actually harms our programs. T/TA providers with knowledge of regional tribal communities would be beneficial to spotting issues with a culturally informed eye, discussing best practices and solutions, and developing sustainable response plans. Such providers would also be more responsive as they would ideally be focused on serving the tribes in their region, instead of a broader portfolio. This would enable them to be more attuned to the academic and cultural calendars of local tribes to better coordinate on the delivery of T/TA services.

Streamlined T/TA Request Processing. In conversations with AI/AN Head Start grantees, we heard repeatedly that the time between a T/TA request being made and the delivery of those services could extend for months. This is incredibly harmfully unfair to our programs. First

because T/TA is a required component of the Head Start program that federal officials must deliver, and second because in the absence of a timely response the issue giving rise to the request (such as student behavior or a financial management question) may evolve or become moot without proper resolution. In these 4rdinstances, federal T/TA has failed. We recommend ACF develop a streamlined process for T/TA requests, including the imposition of a mandatory timeline for responding. ACF should also require that only one T/TA plan be submitted per grantee that integrates, to the greatest extent possible, all of the ECD services that program is administering.

Streamlined Standards Across ECD Programs. We appreciate this RFI's characterization of the ECD system as a "network." The implications of this term, with its interconnected pieces that complement and build off of one another, are appropriate for Indian Country, where we approach community through a holistic set of values. This is true across services areas, and perhaps nowhere as applicable than in providing for our children who represent the futures of our tribes. To raise our children to their highest potential, tribes often utilize a network of ECD programs. These can include Early Head Start, Head Start, Montessori schools, Child Care and Development Fund grants, and state-funded programs. Each program has its own set of performance standards subject to different reporting requirements. The net effect is an administrative nightmare for tribes.

To fully realize the concept of an ECD network in tribal communities, we recommend ACF invest in streamlining performance standards and reporting requirements to the greatest extent possible across all ECD programs under its administration. To the extent possible, we also urge ACF to issue guidance recommending that states also allow for flexibilities where ECD programs serve tribal communities to align state-funded program requirements with existing federal mandates.

We believe that this can largely be achieved through the exercise of administrative authorities in conjunction with tribal consultation, though we recognize that public notice and comment may also be required. The value of a change toward streamlined ECD program requirements cannot be overstated. Aligned standards would free up critical staff for non-administrative work—such as classroom aid, professional development, and family engagement—as well as enable the redirecting of limited funds away from administrative compliance towards services and even facilities. While the upfront work by the ACF would admittedly be a lift, it is one that will pay beneficial dividends for decades to come for program participants and the agency alike. We stand ready to assist you in this process.

Single Clearinghouse of Relevant Information. We recommend that ACF invest in developing a single clearinghouse through which grantees, tribes, and program administrators can access all relevant information around the ECD system would help facilitate the streamlining of program expectations and the coordination of resources. Where possible, the clearinghouse should cross-reference ECD system programs that are outside of ACF, such as regional and state links (we note that some states only accept state-run trainings to fulfill mandatory requirements, even if the ACF training is near identical to that being offered by the state. Where possible, we ask that ACF encourage states through guidance to be flexible in allowing tribal communities to use ACF trainings that are substantively similar to fulfill state mandatory training requirements.).

Follow-up T/TA on Implementation. Long-term relationships with T/TA providers are vital to the success of projects and to addressing discrete programmatic issues. As such, it is critical that T/TA

not be confined to a single instance (i.e., addressing issue X or Y in isolation), but that it be treated as part of a continuum of communication with a program or tribe. This means that the T/TA provider should ideally follow-up with the recipient of services on how the implementation process for any recommendations is unfolding. It may be necessary to correct course or try new methods of attaining beneficial results, and having the original T/TA provider team involved in this follow-up process would facilitate a more seamless experience for tribal communities.

Regular, Coordinated T/TA Offerings. Current T/TA providers are spread too thin to meet the in-service and online trainings and requests for specific technical assistance in tribal communities. When events are offered, grantees and program administrators strive to attend, however, conflicts inevitably arise due to scheduling such events during the school day or at overlapping times with other T/TA. An ideal T/TA system would be structured in a way that offers regular, coordinated events over the course of a year so that there is no overlap in services and the greatest number of interested participants can attend. This may necessitate holding multiple sessions of the same T/TA event to accommodate different time zones across the geographic areas and the ceremonial calendars of tribes.

D. If new or expanded TA supports are needed to support tribal early childhood program implementation and coordination, in your opinion, in what ways can the field (including TA providers) build capacity to provide the needed TA to tribal communities?

Provider Recruitment and Retention. As a core first step to capacity building we recommend that ACF focus on T/TA recruitment and retention. Current staffing patterns—in terms of both placement practices, contract limitations, and outreach—need to be examined. Establishing a baseline relationship with program directors is vital to overall operations; yet, turnover among T/TA providers and the existing contract bidding process make attaining (and sustaining) this objective a challenge. ACF should examine whether procedural changes are warranted to improve its workforce recruitment and retention approach. This should also include seeking additional funding to increase the baseline number of T/TA providers serving tribal communities. Further, trainings on recruiting, marketing, and retention of a qualified workforce should also regularly be provided to facilitate workforce development within programs and tribes.

Partnerships with Tribal Colleges and Universities (TCUs) and Workforce Programs. It is commonly understood that a homegrown workforce has the potential to foster real change due to their roots in the community being served. This is particularly true in Indian Country, where homegrown doctors, lawyers, educators, and natural resource managers contribute meaningfully to their tribes. Yet, it is also true that the levels of these and other Native professionals are woefully low in Indian Country. The aspiration is there among our Native youth and adults to serve, but the opportunities to do so are limited. We urge the ACF to invest in its Native T/TA workforce by establishing partnerships with TCUs and tribal workforce programs to incentivize graduates to enter into these positions. Loan repayment, preferential hiring, benefit packages, and other factors could be considered as part of these partnership programs. Where tribal workforce programs are involved, such incentives should be culturally tailored to that tribe.

Mandatory Annual Site Visits. Capacity building is not only a subject for workforce development. It also speaks to the capacity of T/TA providers to understand the nuances of the programs with which they work and to be culturally competent in engaging with tribes. We think it would be invaluable for at least one person from a T/TA team for a program (such as AI/AN Head Start) to come onsite a minimum of once per year, though more is, of course, the ideal. Onsite interactions enable T/TA providers to gain first-hand knowledge of conditions, to see cultural practices in action, and to have the types of relationship-building conversations that can only take place in person. These are all vital to the provision of meaningful and relevant T/TA in tribal communities. Where streamlining allows, we would urge ACF to coordinate such annual onsite trips so that the T/TA providers serving different ECD programs are able to spend the day together, visiting each other programs and identifying points of overlap for program coordination. If ACF is going to approach the ECD system as a "network," it needs to be engaged as such by all T/TA providers.

Enhanced, Flexible Local Control. We believe strongly that T/TA providers should be deferential to tribes in letting tribes take the lead on how they want the T/TA to progress and be implemented. Tribes know the needs, cultural nuances, traditions, available resources, and best practices of their community intimately. As such, they are uniquely situated to effectively guide the T/TA process in a way that the T/TA provider by him or herself simply is not.

The recommendation for enhanced local control includes within it the need for greater flexibility. This is a theme that resonates across all subjects raised by the federal government for federal input. We need greater flexibility in the use of federal resources to maximize the efficiency of every dollar in our communities to serve our people. What works in one community will not work in another. This is natural in Indian Country where the 574 federally recognized tribes each possess their own cultural values and historical legacies. Acting within these frameworks to implement federal programs necessarily requires flexibility, which should be broadly understood to include flexibility in decision-making, the use of local resources, and complying with the intent of performance standards. While this overlaps with the questions on best practices learned, it is also central to capacity building as tribes must be involved in that process for it to be sustainable.

Tribally Relevant T/TA Materials. Currently, T/TA providers serving tribal communities use materials prepared at the national level. While these contain useful information for our programs generally, they are not crafted in such a way as to make them relevant to individual communities. Cultural relevancy is not a matter of simply changing the colors a material is printed on or adding in graphics that resembling the population being served (though these should nonetheless be included!). Rather, it is a matter of preparing messaging that resonates with traditional stories, societal structures, modes of communication, cultural mores, and the conditions on the ground in a community. These change tribe-to-tribe, and T/TA materials should also, to the greatest extent possible. Ideally these materials would be responsive to individual tribes, but in the absence of such a level of tailoring regionally-based materials would also be advised. These should be developed in collaboration with local tribes to ensure accuracy in the respectful presentation of information.

- E. Do different types of tribal communities have different TA needs and priorities (topics, methods, strategies)?*

The simple answer is: *absolutely*. As reiterated throughout these comments, and upon which we could expound without exhaustion, *different types of tribal communities have different T/TA needs and priorities*. This point underscores the one made earlier on the need for a transition to enhanced local control with maximum flexibility in relation to T/TA. Accordingly, we ask that the ACF not treat this RFI as an isolated event, but rather build on the momentum it has created through timely follow-up listening sessions with tribal leaders and ECD program administrators and staff. The 30+ questions posed in the RFI show in themselves the breadth of issues that should be considered in the assessment of ECD T/TA in tribal communities—and those are just the beginning. Many more issues and questions could easily, and appropriately, be raised. Meaningful T/TA has the power to transform program operations and, by extension, positively impact Native peoples and tribes. We believe strongly that a larger conversation around the fundamental roots of T/TA in Indian Country needs to be had in order to lay a common foundation for discussing its implementation in the specific field of ECD. To date, this is not a discussion that federal officials have formally held with tribal leaders. We encourage ACF to be the first.

F. What are key challenges and lessons learned in providing effective TA to tribal communities to implement coordinated early childhood programs and systems?

Universal Access for All AI/AN Children. Native children living on tribal lands and in urban areas face tremendous barriers to success from a very young age. Higher than average rates of poverty, negative health outcomes, high school incompletions, substance use, overcrowded housing, and exposure to incidents of violence impair the ability of our children to focus in school and achieve academically. Yet, time and again, studies have shown how participation in Head Start can change the course for these children and give them hope for the future. A straightforward, simple, and absolutely necessary best practice for ECD systems in tribal communities is for ACF to provide universal access to AI/AN Head Start and Early Head Start for all AI/AN children regardless of income. Doing so is just (as a matter of cultural repatriation), right (as a matter of tribal sovereignty), and consistent with federal policy (as a matter of honoring trust and treaty obligations). We ask that the ACF to engage with us further on advancing this proposal.

Holistic, Flexible Approaches Work in Indian Country. We firmly believe that beneficial knowledge can come from any source to enable us to better serve our Native children. We would therefore like to share an example of lessons learned in providing effective TA to tribal communities that comes from across the international border in Canada. Akin to the United States' system of AI/AN Head Start (Region XI), Canada administers its Aboriginal Head Start program in urban and on reserve locations. One of our programs had the opportunity to be trained in the Learning to Observe, Value, Inspire, and Transform (LOVIT) Way of implementing Aboriginal Head Start. See <https://www.thelovitway.ca/>. The methodology centers around holistic guidelines that are culturally respectful, linguistically integrated, and collaboratively engaged with program staff and student families. It also focuses on evaluating service delivery in a way that is aligned with tribal governance and social structures, rather than annual quality improvement assessments that impose non-tribal standards on programs. We think that this methodology should be explored by ACF as a source of potential practices, where appropriate, to weave into consideration under this RFI.

III. Conclusion

We are encouraged by the ACF's solicitation of information around T/TA provided for early childhood services in tribal communities. Ongoing assessment of the quality, accessibility, scope, and component pieces of this T/TA is essential to ensuring AI/AN Head Start's document success in addressing the early childhood educational needs of Native children and their families. We urge ACF to continue engaging with NIHSDA, AI/AN Head Start staff, program administrators, and our TA providers on an active basis as it moves through the stages of policy development to implementation going forward.

Respectfully,

Lee Turney, President
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