



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

Virtual Tribal Consultation – Summary Report

September 14, 2022

OHS Representatives

- **Katie Hamm**, Acting Director
- **Tala Hooban**, Deputy Director
- **Heather Wanderski**, Program Operations Division Director
- **Todd Lertjuntharangool**, Regional Program Manager, Region XI American Indian Alaska Native (AIAN)

Greeting and Introductions

Katie Hamm, Acting Director greeted all those on the zoom session and thanked them for being here. Acting Director Hamm provided background on herself, stating she is the Deputy Assistant Secretary for Early Childhood Development and the Acting Director for OHS. She added that she was joining today from Washington, DC, the ancestral homelands of the Anacostan, Piscataway, and Nacotchtank people.

Tala Hooban, Acting Deputy Director, welcomed attendees, and expressed her excitement to attend today's Tribal Consultation.

Heather Wanderski, Program Operations Division Director, welcomed attendees, and thanked the tribal leaders in attendance.

Katie Hamm then turned the meeting over to Mr. Todd Lertjuntharangool, Regional Program Manager for Region XI.

Transcript from OHS Informational Overview/Presentation

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

National Overview

Todd Lertjuntharangool:

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

FY2021 Tribal Consultations

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

Program Operations

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

FY21 Funding Update

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

COVID Appropriations

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

What have we been up to in 2021?

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

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

One thing that we've seen as a result of the last two years is a large number of brand new directors across our Head Start and Early Head Start programs. The National Indian Head Start Directors Association, they made it clear to us that we needed to make support to this cadre of new directors, top priority. We're planning this initiative in October. Some of you may have seen emails and eblast from me specifically about that. I sent those out to those programs where we know that the director has been in their tenure three years or less. I encourage tribal leaders if you can, to encourage your new directors to attend and support them coming to San Diego to be with the Office of Head Start, our T/TA contract, and a few more experienced directors that are also going to be supporting that event. With that, I can go ahead and hand it back over to Acting Director Hamm. Thank you.

Meaningful Consultation with Sovereign Nations

Transcript from Testimony of Phelia Nez: First Lady of the Navajo Nation

It's good to be here with all of you today. On behalf of the Navajo Nation, we appreciate the Office of the Head Start for the opportunity to talk about the needs of American Indian and Alaska Native children and their families taking into consideration funding allocations, distribution formulas, and other issues affecting the delivery of Head Start services on tribal lands. Navajo Head Start is one of the largest educational programs on the nation, with participating students ranging from zero to five years of age. This program is federally funded to provide comprehensive educational services to over 1,350 children in over 63 Navajo Nation communities. Navajo Head Start employs over 300 staff members and strives to support a strong foundation for the children at the Navajo Nation to excel academically. Navajo Head Start has the potential to be an independent school system, but requires training and technical assistance to accomplish this goal.

We therefore recommend that number one, OHS provide training and technical assistance to enable tribal Head Start programs to become independent school systems. Number two, OHS representatives provide consistent and effective communication to efficiently coordinate early childhood programs and initiatives. And number three, OHS administration and our grant agencies improve communications with their grantees and provide onsite assessment to evaluate the challenges and best practices at the current structural layout of educational instruction. The average household size under Navajo Nation is 3.45 persons. Approximately 10.4% of the Navajo Nation is between the ages of 15 and 19-years-old. The poverty rate for Navajo families with children under the age of five is 42%. The overall poverty rate on the Navajo Nation is 56.1% and is attributed to mass unemployment, which is 11 times higher than the national average. Within the Navajo Head Start program, 71.6% of families are low income. 22% of households on the nation have access to a telephone and only 15% of households have access to a computer. Could be desktop computers, laptops, notebooks, smartphone, or

other devices. Lack of technology makes it difficult for Navajo families to take advantage of online learning or for parents to stay in contact with their children's teachers and students are at risk of failing or falling behind in coursework, jeopardizing their academic success.

This puts Navajo children at a disadvantage compared to those living off the Navajo Nation. We therefore recommend the following. Number one, OHS should ease restrictions on approval of utilizing funds to address structural deficiencies, i.e., enhance IT systems that include hardware, software, servers, and enhance broadband by internet service providers. Number two, OHS should provide funding to enhance technological infrastructure to expand broadband and internet to remote and isolated areas. Number three, funding formula should be based on land mass and/or population. This will address the digital divide and each tribe's early childhood priorities.

Number four, OHS must also develop indigenous models of education and service delivery that incorporate a hybrid or distance model of learning. Navajo Head Start operates 80 Head Start sites and five Early Head Start sites. 74 are in operation, and six are closed due to compromised structural integrity and staff shortages. 77 sites are in dire need of replacement due to structural deficiencies. Many sites are over 58-years-old. Navajo Head Start also needs financial investments to build collaborative efforts with other federal, state, and local governmental entities and regulatory offices to promote outreach and extend services to remote, isolated, and impoverished communities. The recommendations are the following. Number one, OHS should provide more funding opportunities for tribal Head Start programs, enhancing support for cross jurisdictional entities to have various right and services. Adjust the funding cycle for the larger tribes by allowing application cycles to be completed every six to eight years, rather than five years.

Number three, OHS should be flexible and adapted tribal fiscal year processes. Funding cycle should be aligned with the federal funding cycle rather than staggered cycles. Number four, flexible funding is provided for facility replacement under 45-C4, subsection 1303, to replace Head Start centers. It is unfeasible to renovate, outdated and structurally compromised facilities. The Navajo Nation has been proactively working toward language preservation, allowing for specialized funding, or extending language revitalization. Grant opportunities to Head Start programs would assist in the preservation and protection efforts. Services can be designed with community input and coordinated at the local level. Without appropriate resources and technical assistance, it is difficult to ensure that all areas on Navajo Nation receive equal access to education and language preservation services. Sporadic and inconsistent support does not address the true needs of tribal Head Start programs in delivering culturally appropriate services. But further entrenches tribes in a system that inherently does not account for unique needs or circumstances.

The Head Start grant is one of the most heavily regulated grants in the US that is inconsistent, inaccurate, limited, and support does not rise to the level of training or technical assistance required by the Head Start regulations. We therefore recommend number one, OHS create positions such as an assistant secretary or tribal liaison who has decision making authority to consistently support tribes to administer grants. Number two, OHS must acknowledge tribal government's right to self-govern, rather than imposing strict federal regulations that do not work well within tribal governmental systems. Number three, OHS receive training on cultural competency, cultural sensitivity, anti-racism, and tribal sovereignty. Office of Head Start should modify their consultation policy to adopt the principles of meaningful consultation and be consistent with the United Nations Declaration on Rights of Indigenous peoples, focusing on free prior and informed consent. This would include issuing, "Dear tribal leader," letters at least 60 days prior to a consultation and including specific questions on policy changes.

This would give more time for tribes to respond. We further asked the federal government to require all state governments that receive federal funding to participate in tribal consultations and honor tribal sovereignty. In terms of early childhood education, early childhood development, early childhood mental health, just really advocating for our children who are prenatal, all the way through five years of age. All the children who have yet to step foot into a kindergarten classroom. Early childhood education is so important when we're talking about childcare, the centers and then of course, their mental health and the healthcare. All those resources are so important. And then of course, really working with parents to give them the skills and just the community education on why it's so important to have stability of homes and just the environment that they grew up in. There's a direct link between the early years of life, and then of course, positive, and negative outcomes for them later in life in terms of literacy rates.

And then of course, how many of them are... Just how far they will go in their educational endeavors, and then whether they'll have housing, the type of career they'll have later in life. That's just something that I always put an emphasis on, and I would say the federal government continue to prioritize early childhood initiatives on tribal lands. And just working with Casey Family Programs, really when we're talking about prevention of negative outcomes for our Native children, we're talking about establishing their sense of identity, sense of safety, sense of connection, and sense of purpose. Those four items are what leads to prevent them from ever getting involved in the criminal justice system. We really want our children to have homes later, to have housing, to have employment, to have higher education, and to have a good career field.

But overall, to understand just how important the roles are of being a parent, of being a mom and a dad. That's something that I always say is the most important roles that we'll ever have in life. Just how important prenatal care and the zero to five, those first five years of a person's life, their brain development and everything that's involved there. It really is to me, the nation building, it's those first five years of all our Native children's lives. So, thank you again. And the Navajo Nation hopes that the Office of Head Start, will take these recommendations into consideration to enhance our education programs and of course, to improve our nation-to-nation relationship. Thank you again for meeting with us, and we look forward to further discussion on these issues. Thank you again.

Meaningful Consultation with Sovereign Nations

Transcript from Testimony of Councilman Peter Garcia of the Ohkay Owingeh Tribe

Good afternoon. That was a great testimony from the Navajo Nation and some of the things that from Ohkay Owingeh standpoint, and some of the tribes in Pueblos here in New Mexico phase, are some of the things that happened through COVID. And we've had a lot of children and parents that tested positive, but they came out okay. So, we started in-person classes a little late also, and some parents were still reluctant to send their kids to classes. So, that's still a concern because we don't have the amount of kids that we were funded for. We're still lacking kids, but they're coming around slowly. That's going to have some effect on how we submit our reports. But one of the things that also is... I know that the lady touched on early childhood, but we also face parental problems from zero to all the Head Start. It's feels like young kids are having kids.

We also have a problem with some of those young parents that have or are having a drug problem. So, we need to find some way to have parental classes and how we can do preventative maintenance on the drug problems that are within our systems. So, those are pretty bad situations because then what happens is the

babies are taken away and then they're being raised by grandparents, and some of the grandparents are old. They need, or we all need to support the grandparents when that happens, especially the courts, because when they try to become the foster parent or raising the child, the courts for some reason don't acknowledge the grandparents because they're always asking, "What does the mother, or what does the father have to say about what you want to do with this child?" The grandparents don't have authorization to make decisions on the child that they're raising. That's an issue also within itself I think that funding wise for our language that we teach in our education systems, I know Head Start, we still, we're doing that. We get a little bit of funding, but it would help to get more funding for our languages because as everyone knows, all the indigenous tribes or people are losing their language every year. We are losing most of our fluent speakers.

They're getting old and we're trying to teach our young people the language that they're born with. So that also is an issue in itself. And I think that most of the Head Start facilities are... Oh I know our Head Start facility, what we're doing is renovating year after year, after year to be in compliance. But the building that we have our facility in is almost 55 years old or older. And I think that there isn't anything within the system where any funds are available to do construction or build new facilities. then I think that in order to continue our education system from zero to Head Start, we need better facilities.

So it's important with that. The other thing is that we still need, I guess professional development and we need some funds to hire professional people to do the professional development to our teachers. And I know that through this pandemic, a lot of people have resigned from their jobs, and I mean very good jobs that they've held. For whatever reason, a lot of people have resigned. And I know we have an issue with our Head Start. We've gone through a regular Head Start director resigned in '20 and we've had a hard time finding a director. We've had two other interim directors in place, and we have not had any applicants for the director position. So that is an issue here and it makes it harder for the staff because they're not fully staffed, and they don't have a leader. But the interim directors have tried to do the best that they can and we're supporting them and we're trying to find a professional development in how the Head Start... It's a complex program and so we're trying to find help for the one that we have in place now.

So that has become quite a bit of a problem for us. The other factor is, I know it goes back from the time that Head Start was established and we have a lot of parents that have gone through Head Start and they've gone through the educational systems. A lot of them have college degrees and now they have very good jobs. But the problem is the income criteria that we face now because it's most of the parents are overly income, but we're trying to find a way to get them in and it's becoming a big problem.

So, what do we do from the fact that we have to be in compliance with all these regulations that are put in place, and it sort of creates an issue for us and for our parents and for our Head Start. And we're a grantee status, Head Start. So, it makes it hard for us to fulfill all what we're funded for because we've had to deny a few parents because they're overly, I mean way over the income because both parents went through the Head Start system and now, they're both college graduates and they have very good incomes and puts them way over the income level. And so, what do we do? So those are questions that we're faced with. So, thank you very much for listening to some of my concerns.

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Transcript from Testimony of Chairman Ned Norris, Tohono O'odham Nation

Chairman, Ned Norris: We've got about 35, 36,000 enrolled tribal citizens. We've got about 2.8 billion acres of tribal, of reservation. We also have about 62 miles of international border that borders the southern part of our reservation with about 1500 tribal citizens that live in Mexico. Not necessarily because they want to live in Mexico, but because that's where they ended up when the international border was established. Within the 2.8 million acres, we have about 66 very rural and remote tribal villages, tribal communities. There are seven Head Start centers on the Tohono O'odham Nation. The San Xavier Center has about 20 children. The Sells Center has 59 and the Pisinemo Center has 20. Vaya Chin Center has 20 children. Santa Rosa Center, 20 children, North Komelik Center, 20 children. San Lucy, 10 children, and our home base option, 12 children. To be more specific about the Head Start program itself, the Tohono O'odham Nation is honored to be part of the Head Start family since its inception in 1965. And we believe that this, the Head Start, the Nation, the Tohono O'odham Nation's Head Start program has been the longest sustained program.

Head Start program has been the longest sustained program within our tribal nation. The focus of the program is on education and health through the family and community model, which is really infused in with culturally appropriate instructions. I just want to talk about three or four major points of concerns we have and recognize that some of these concerns are shared issues with other tribal entities as well. But let me just get started here. Regarding the points of advocacy for tribal leadership, cultural teacher qualifications is what I want to spend a little bit of time on and just say that the current regulations for meeting the qualification requirements for education, for education coordinators, teachers and teaching as teacher assistance will produce burdensome challenges for tribal programs. The challenge specific for the O'odham nation is that teachers that are tribally certified are not accepted as qualified Head Start teachers. We prioritize cultural experts who are fluent in our language, in the Tohono O'odham language, in our classrooms. Those teachers are certified through our own vetted teacher certification process.

Our teachers, as I said, are tribally certified, are most likely older members of our tribal nation, citizens of our tribal nation, and therefore have a low interest in seeking a degree to meet the Head Start teacher qualification. We would offer this following recommendation, that the Office of Head Start should consider replacing your teacher qualifications requirements with tribal qualifications for tribes that have their own teaching certification process. That's one of the items that we wanted to bring to your attention. I do have our executive director for tribal education on the line with us. I'll ask her to chime in after I get through here and offer any additional comments that she might like to make.

The second item is the class and designation renewal system. Talking about just that we have continued concerns regarding the cultural appropriateness and reliability to our native population, Native American population. Teachstone, the developers of CLASS, cannot provide research data on American Indian and Alaska Native children to show cultural and behavioral norms or differences for a large usage of class. That's the class assessment scoring system. We understand that there is white paper that references on the importance of cultural competency and respect, but no credible information on how class influences tribal teachers or children. The challenge that we're experiencing here is that our Head Start operations are measured by a system that is not culturally appropriate for our unique population. We offer this following recommendation, to exempt American Indian and Alaska Native grantees from CLASS until it has been tested and shown to be valid and reliable with the American Indian and Alaska Native populations. That's the second of three items that I wanted to bring to your attention.

The third one is the staff qualification professional development. Indian Head Start programs have great difficulty in recruiting and retaining teachers and teacher aids. The Tohono O'odham nation has several longstanding vacant positions due to unqualified applicants. We recently reclassified all teaching and specialist positions to ensure that we comply with the Head Start performance standards. What this does is pushes the program to seek additional funding to increase salaries. The challenge that we have with this particular issue is that the difficulty in recruiting qualified applicants with an existing CDA, AA, or BA in early childhood education. Teachers earn required degrees and leave Head Start for other higher paying positions. Head Start employees who obtain a degree are able to seek employment with the local school system or other early childhood programs for a higher pay wage. That's primarily due to inadequate funding levels.

Tribal Head Start programs are unable to compete with the wages that other schools and ECE programs can offer to its employees. They are able to earn a higher wage with fewer requirements, creating perpetual vacancies within the Head Start program. Another item under that particular issue and heading is the funding to maintain qualified teaching staff. The Head Start Act continues to increase the educational requirements for teaching staff but does not provide adequate funding levels to tribal programs. That would allow programs to increase current wages to be competitive and to improve starting wages or wage scales of the program.

With all that, the Tohono O'odham nation recommends that grant waivers for staff that do not meet the degree requirements until funding levels are increased to allow for competitive pay of qualified staff. We're asking to grant waivers, to those staff that do not meet the qualifications, until those funding levels are increased to allow the competitive pay for qualified staff. Also, to allow programs to renegotiate their cost per child to allow for proper compensation and retention of qualified staff. Those are the three items, issues, and recommendations that we offer in this consultation.

Just to say in closing, the Tohono O'odham nation will continue to exercise our efforts toward embedding our culture, our way of life, and the work that we do for education and the wellbeing of our children and our citizens. It is our hope that the opportunities to work with the office of Head Start in our shared goals for the success of the students. We still very much obviously want to continue to work with Head Start, but we're hopeful that you will take these issues into consideration and the recommendations that we offer here. Executive Director do you have any comments to make or clarifications that I may have not been accurate or correct on? Maybe she lost the call. I know she was having technical difficulty earlier.

With that, I'll go ahead and close. Thank you, Todd, and the rest of the folks there at Head Start. We truly appreciate you listening to us and the opportunity to share these. Thank you.

Meaningful Consultation with Sovereign Nations

Transcript from Testimony of Camara Alexander, Tribal Head Start Northern California

My name is Camara Alexander. I am with the group Tribal Head Start here in Northern California. I'm going to list some of our concerns. Unfortunately, our tribal chairman and our tribal liaison were unable to be at this consultation. Our concerns are going along with everyone else. A little about our tribe, we are very rural. We are a little bit more isolated than most. One of the biggest impacts that we've had recently going on for two years now is we are heavily affected by wildfires right now. Over two years ago, one of our...

Straight through our tribal headquarters, the town was completely evacuated over two years ago. We've had over 200 houses burn down. Unfortunately, it's been two years and we're just now starting to build about two houses.

We've had a lot of people had to relocate and a lot of homelessness regarding that because we have a lot of families who refuse to leave and are still just trying to figure out how they can make do with the land that they're from. They choose to stay there. But they are really facing the lack of housing. It is starting to really affect our enrollment, numbers, and staffing. We've had quite a few staff who've had to relocate and just being affected by the wildfires but is also due to wages and the level of education required for Head Start positions. They're finding that they'll come into our Head Start program, they'll work their way up, they'll work their way through their education, and they will love the program, they'll love Head Start. But then they're seeing realistically how that affects their income and ability to provide for their families when they've received this education. Now they can go over to this elementary school, to the different school districts, and they're offering a lot more competitive wage for them.

One of our concerns and suggestions is to find a way that we can increase our funding for the education requirements that's required for our staff. Another big concern is also regarding facilities. I know that's a big-ticket thing that we've been talking about. I know quite a few other tribal programs; we've all been saying that we have the older buildings. It is becoming, how can we stay in compliance to have our programs being operated safely? It's becoming a big challenge because we don't want to just patch a band aid on it. We want to make sure that we're able to fully address our facility needs with more funding and able to make sure we're able to comply.

Our other concern as well is Classroom Assessment Scoring System (CLASS). We have seen. We've been able to, within our program, get a few of our staff to be class certified. That has helped to a degree really try to help our staff to train them regarding get them ready and prepared for when we're CLASS reviewed. But then we're also noticing it is hard to find it very reliable when other people come in to do the class review with them. We do still see the differences regarding the culture for our indigenous families, for our program on how class is being reviewed, how the scores are, and how they are becoming evaluated with the class tool.

We've been trying to utilize and find ways to have our staff be class certified to try to help bridge that gap. But there's still that gap within the cultural norms and regarding how it's being evaluated for that tool. That's one of our suggestions as well, to define more support regarding specifically CLASS trainings in regards for reviewers, for how they do with tribal programs and different indigenous programs for them, for support as well on how they utilize that tool within tribal programs. Thank you.

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Transcript from Testimony of Shane Drift, Bois Forte District (Nett Lake)

Good afternoon, Shane Drift, Bois Forte District one representative for the Bois Forte tribal council. I have testimony on behalf of our Head Start program here in Nett Lake. Anytime it comes to the languages, I'm all for that Revitalizing, offering any increase in funding for the languages. That should be mandatory. Also, I would ask for an increase in our teacher's and manager's salaries and benefits. We as a tribe, as we start to move forward and in all aspects to the various departments within our tribal government, their salaries and their pay grades and stuff like that is that I would not want to see certain positions left behind because of lack of funding. And my concern would be with Head Start, that if we are to move forward as a tribal

government, that we would be able to move all the departments ahead and salaries and benefits. And I used to work at the Head Start back in the 90s. I was the Head Start teacher aid, bus driver, janitor. So, I wore many hats while working at the Head Start pretty much throughout the 90s. And I know that the pay scale was not that high, was not that great. But I loved working there and it was an awesome job. Thank you.

OHS Remarks and Responses to Testimonies given

Transcript from OHS Remarks and Response today's testimonies

Katie Hamm: It's been interesting and helpful to listen to you all share and provide your experiences, suggestions, and ideas. I wanted to start with some opening comments and then invite my colleagues from the Office of Head Start to also add additional thoughts. I know we've also had some additional people join partway through the meeting. For those of you who've been on with us the whole time, this might be somewhat repetitive, but I want to make sure we share all the relevant information with everyone who's been able to join us since we opened the meeting.

I had just one further reflection on eligibility, which I know has been an issue that's consistently come up, specifically around families that would benefit from Head Start services not being eligible because of income. This is something that requires a legislative change, pass through Congress because it's in the Head Start statute. However, the Department of Health and Human Services is supportive of more flexibility when it comes to eligibility for AIAN and programs. We've been in touch with the Secretary's office about it. They are very supportive and looking forward to communicating the administration's support for that flexibility to a broader audience.

We've heard a little bit about the workforce challenges, identifying people who have the qualifications required under the Head Start Act, especially in a challenging labor force environment. That is something we've heard a lot about in previous consultations and up, down, and across in Head Start. I wanted to share, we just put out earlier this week, so not everyone has likely had a chance to review it, we put out an information memorandum (IM). Review it. We put out an information memorandum on improving compensation and benefits for the Head Start workforce.

The IM really encourages programs to look at sustainable ways to increase wages, improve staff wellness, and address some of the vacancies that we know have been a struggle. Understanding that this is going to require some flexibility, and some partnership between the office of Head Start and grant recipients, we're strongly encouraging that folks look at their existing needs in their workforce, identify where there are vacancies, where there are positions with high turnover, or difficulty recruiting and retaining staff, and think about some of the structural changes that are needed to address that. Is it increased salaries? Is it increased benefits? Is it improving job conditions, or staff wellness?

The IM also addresses waivers for preschool teachers, should that be a need that someone needs to pursue. Tala put the link to the IM in the chat, definitely look at that. It is something that we're hoping you'll give deep thought to, will be able to think through, what changes in your programs might be needed, to address some of the challenges that we know you're facing

Tala Hooban: I think the important thing to note for the IM, and thank you Katie, is to show the flexibility, and to show that the regional office is there for you, if you have any questions about waivers, if your Head

Start directors have any questions. Work with your regional staff, they are here to help and support in addressing some of these hurdles we're all experiencing nationally, but in AIAN communities. I don't have anything else.

Heather Wanderski: I think that we've been hearing some testimony around very specific points that have been raised, that are addressed specifically in this information memorandum, thinking about the permanent increase of compensation for staff, particularly as it relates to that retention ability. I think that there are very specific points in this, that you can use, and that are available, to help think through where you may need to consider making some changes, or where there might be some opportunities, considering hearing some of this testimony. I would offer that to Todd and see if he had anything to echo. I agree, there are some things and opportunities that may be available to programs now that we have this new memorandum out.

Todd Lertjuntharangool: One thing that certainly has been consistent across all of our consultations for several years, and prior to the pandemic, is staff wages, and salaries to staff. I want to take a moment to have some dialogue around that, and invite some of the leaders from around AIAN program community to join in and give your thoughts. As stated by my colleagues, we did just issue this updated information memorandum that provides some options, and some thoughts of what programs can do to create some tangible increases for their staff.

I first want to acknowledge that these different options and these ideas, they're not going to be applicable to every program, and every program experiences those challenges differently, and the factors that influences them are different. I don't want to communicate it as though it's just a broad suggestion to every program. We know that over the last two years, the landscape that we operate in has changed drastically, in terms of what's happening within our communities, the age eligible population within our communities, the other service providers that are now operating within our communities.

I really want to encourage programs, and I've said this I think just about every conference and consultation that I've been in, to really engage in a thorough community assessment, and really identify what that current need in the community is. Identify what that age eligible population is, what that income eligible population is that is not already currently served by another program in the community, and with that, really take a look at your existing program design and scope and verify that it is still accurately aligned with what that need is. We know that, unfortunately, a lot of it due to the pandemic, our programs around the country are serving a significantly lower number of children and families than they were prior to or going into the pandemic. We know that, given where we are now, we are working back toward that, and our programs are working to reach all eligible families in the community again.

We also know that income eligibility has been a hot topic, and over the last year or so, with each year that passes, we really see less family's income eligible for Head Start. I know that our tribal leaders have really advocated for the topic of eligibility, but I'm going to speak to what the existing requirements and guidelines are around eligibility. I want to encourage those programs that are not currently fully enrolled, and have identified that there is a lower number of eligible and children families in the community, to really work with the regional offices, and talk about what potential changes might need to be considered in order to make sure that, one, we're aligning to meet the existing needs of the eligible population, and also, the need of our staff, in terms of those salaries

Certain things we've seen programs do, in terms of some of the changes to the design are, in some cases, lowering their proposed enrollment, because that population has changed or decreased in their community, and that has allowed them some options, in terms of how they allocate across their existing budgets. I'll give just one significant example within our region. I know we worked with one program, and this was prior to the pandemic, that had been under enrolled, and they were under enrolled for about a year and a half. After doing some assessments in the community, after also employing some new recruitment tactics that really didn't produce additional children or families, and after conducting wage comparability studies, we found that eligible population had decreased. We found that the wages we were currently offering were not commensurate with like positions in the community. Based off that, and working with tribal leadership, the decision was made to decrease the number of children we were proposing to serve, and not fill classrooms that were already empty, and allocate the funding that would've gone to the operation of those classrooms, reallocate that to the existing staff in those classrooms that were operating, to support staff increases. That's one option that we've seen programs do, that did result in tangible increases to the existing staff, and did help them, in that regard, get closer to being more commensurate with what other organizations were paying for like positions in the community. I just want to make sure that when we do have that conversation, that programs know that we are open to hearing your ideas, and your thoughts about how you work within your existing budgets.

We understand the need for additional funds, but with our current statute, the Office of Head Start can't just make arbitrary increases to existing, permanent funding levels. What we require is either a notice of funding opportunity that describes a new appropriation of Congress, or the availability of funding. Then, we must facilitate the ACF competitive grant process, to award what would be permanent increases.

We really try to work with our programs to, again, just make sure that our program designs and our scope are supportive of high quality services to eligible families, and, certainly commensurate pay for the staff positions that we do have, who implement those high-quality services. I do want to pause there and see if there's anybody who had thoughts or questions regarding the IM, or around changes in program design, or enrollment.

I think that challenges around COLA each year, the cost-of-living adjustment, is one that we're familiar with. We know, in certain grant recipients, that can present a challenge. Certain grant recipients, because it doesn't align with what their internal pay scales are, they encounter that barrier there, in being able to apply that to the existing staff. I think that's one reason why, just being transparent, we like to bring up a consultation with tribal leaders, too. Certainly, for us, I'm always going to be biased, I work for Head Start, but we want to prioritize that workforce. We want to prioritize the group of people under whose care we place our most vulnerable families, and our babies, and our children. We do all we can to work with those tribal leaders.

In regard to the availability of workforce, I think we're in a really tough spot. Certainly, I think this topic, and when I talk about it, it doesn't always make me the most popular person, but a sad reality of where we are now is, I don't think any of us ever want to have to rely on the availability of workforce as a primary deciding factor in the scope of what program we can operate. What I've told the program before is, unfortunately, staffing, workforce, and that human resource is a resource, just like so many other resources that we rely on, in order to generate a program design, and put forth proposals of what we feel confident we can operate at a high-quality level. I think that impacts every program differently, but it's certainly something that we want to make sure that those programs who are experiencing challenges with available workforce, we are engaging in some direct dialogue with them, to try to help, as best we can, overcome some of those

barriers, or find avenues that are still going to allow that program to be successful in meeting the goals you guys have set for your programs, for your kids, and for your families.

Katie Hamm: I would just offer; you know your communities best. When we think about looking across different sectors, and wages, and comparability, I think it's important that we think about Head Start staff and the qualifications that many of them have, especially in relation to the school systems. We've really encouraged thinking about parity with the school system, as opposed to other sectors that might be less relevant, or less comparable to what we're asking of our early educators in Head Start. I would offer that as a thought, as we think through this very complicated topic.

Thank you so much for your comments. You've echoed a lot of the themes that we've heard today and thank you for providing some specific experiences that you have received. The staffing shortage is especially poignant right now, so I appreciate you providing what that's looked like for you, and some of the difficulties with hiring and retaining staff. I wanted to thank the group for all the comments on the CLASS assessment. That is something that we're looking at. It's something that we've heard before, and we appreciate you all sharing your perspectives on it, and some of the experiences you've had with staff who have been certified observers for the class. Thank you

Closing Prayer: Micker Richardson

Closing

In closing Mr. Lertjuntharangool shared that OHS will provide a formal written response on the Early Childhood Learning and Knowledge Center website within 45 days of the consultation. He thanked everyone once again for their participation and their testimonies and closed the meeting.