

SUMMARY OF ISSUES AND RECOMMENDATIONS

OHS TRIBAL CONSULTATIONS IN 2010 AND 2011

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INTRODUCTION

Each year, the Office of Head Start (OHS) conducts consultation sessions with tribal leaders and their designated representatives in regions where American Indian/Alaska Native (AI/AN) Head Start programs operate. This report summarizes the key comments and concerns of Tribal Consultation participants in each of the last two years, 2010 and 2011. The comments are organized into 10 topic areas and then into subtopics. The comments represent the priorities of Tribes and AI/AN Head Start grantees. Some issues raised in 2010 were not raised in 2011. And other issues raised in 2011 were not discussed the year before. These comments represent changes in priorities from year to year as OHS strives to address tribal issues, concerns, and recommendations from participants. Where applicable, responses from OHS are included in italics immediately after the participant recommendations.

PROGRAM FUNDING AND GRANTS MANAGEMENT

Program Funding

2010

- Broaden the definition of expansion to include more than adding slots – include staff hiring and transportation.
- Rebudgeting Authority: Give Tribes more flexibility to bring back things that they have had to give up.
- Programs need resolution on the amount of funding they can adjust in a budget year without having to get approval from the Federal office.
- Competition for expansion dollars was a harried experience.
- It is awkward to come to tribal leaders to ask for more funding. Sometimes issues come into conflict with Federal partners because each nation has its own government and procedures.
- It seems as if Tribes are awarded proportionally less money than non-tribal programs.

2011

- Tribes are supportive of President Obama's budget but need more funding to train staff, provide program activities, improve salaries, and obtain/improve facilities.
- Tribes would like to continue the momentum of increased services under the American Recovery and Reinvestment Act (ARRA) expansion funding and are against budget cuts.

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Program Funding – Participant Recommendations to OHS and OHS Response

2010

- Broaden the interpretation/definition of expansion to include more than adding slots – include staff hiring and transportation.
- *OHS Response: Sec 640(a)(3)(A)(i)(II) and 640(a)(3)(B)(i) make clear that special expansion funds available and set aside under the statutory funding formula are only available “to increase enrollment in the programs involved.” Therefore, “expansion” funds may only be used to increase enrollment slots.*
- Clarify the amount of funding Tribes can adjust in a budget year without having to get approval from the Federal office.
- *OHS Response: 45 CFR 92.30 is the government-wide grant regulation, applicable to tribal grantees, governing the circumstances under which budget modifications may be made without prior, written approval. The total amount of funding that may be re-budgeted depends on the total approved budget of the grantee. See 45 CFR 92.30 (c)(ii).*

Cost-of-Living Adjustment

2010

- Many grantees that cannot afford Cost-of-Living Adjustment (COLA) do not apply for it, and would lose increase in base funding. Tribes need clearer explanation of the clause that allows programs to apply for “other than salary and fringe.” Some Tribes do not allow programs to give COLA because they would then have to give COLA to tribal non-Head Start staff.
- Programs do not know they can negotiate grant for the percentage of COLA.

2011

There were no significant comments on this issue in 2011.

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Cost-of-Living Adjustment – Participant Recommendations to OHS and OHS Response 2010

- Inform programs that they can negotiate for the percentage of COLA.
- Clarify the clause that allows programs to apply for “other than salary and fringe.”
- *OHS Response: The latest communication related to COLA was ACF-PI-HS-12-01 issued January 26, 2012. That Program Instruction (PI) states: “COLA increases should be used to permanently increase the Head Start pay scales rather than only increase the salaries of current employees. Grantees that believe there is reason not to increase their pay scale to reflect these COLA increases must provide an explanation as to why such an increase is not considered appropriate.*

Any funds remaining after providing the COLA increase in the hourly rate of pay may be used to offset increased operating costs in other areas of the budget. This includes increased costs in rent, utilities, facilities maintenance and insurance, contractual arrangements, vehicle fuel and maintenance, supplies, and equipment.”

Under the terms of the PI, OHS could authorize individual Head Start/Early Head Start (EHS) agencies to use funds otherwise to be used for COLA increases for purposes other than such increases. The second paragraph of the PI cited above can be read to allow funds available for COLA increases to be used for operating costs if the hourly rate of pay of current Head Start/EHS staff is increased by any amount (even \$1).

Grants Management

2010

- Funding announcements should not be limited to 3 days because Tribes have tribal government process to go through before they can submit proposal. Tribal leaders are not in the office all the time. Tribal programs need at least 9 days. Process includes: writing application, taking it to policy council for approval, and getting it on tribal council agenda 30 days in advance for review. After tribal council approves, the application might not get signed for another week.
- Years ago, programs were threatened with getting “written up” if they do not respond ASAP to requests for more information. The turnaround time is difficult. More often the request is from Office of Grants Management (OGM), not OHS.
- Enterprise System: Programs enter data in timely manner, but OGM does not use it.
- FAAs are always late. Grantees with tribal funding can make it, but others cannot.
- number of grantees are not receiving instructions for writing their funding application in their packet. This can be difficult for new directors.
- Due to high turnover, AI/AN Head Start directors need to be reminded that instructions are on ECLKC. However, instructions are not laid out properly. For the continuation grant instruction, part of it is listed under full grant.

2011

There were no significant comments on this issue in 2011.

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Grants Management – Participant Recommendations to OHS and OHS Response

2010

- Ensure that grant instructions are accurate.
- Develop a standard protocol for offering orientation and technical assistance to new Head Start directors.
- Post funding announcements for 9 days.
- *OHS Response: Recent funding announcements have not had a 30-day turnaround. Head Start/EHS agencies are provided Funding Letters that include instructions for submission of funding applications. Management staff are responsible for contacting their Program Specialists with any questions or need for clarification. Program Specialists are responsible for working with Office of Grants Management (OGM) Grants Specialists to obtain needed information in order to provide technical assistance to grantees.*

Indirect Costs (see also Non-Federal Share)

2010

- When salaries go up, it is an administrative cost. Programs waive indirect cost for Head Start grants; so Tribe is picking up those costs. But that is not Non-Federal Share. There is an expense to operate a grant. Programs are exceeding the 15% cap by funding indirect costs.

2011

- Among the unfunded mandates is the disallowance of indirect costs for late funding agreements. Recommend establishment of temporary indirect cost rate to allow programs to establish this rate even if the Federal fiscal year is not the same as the program's year.
- Tribes questioned the authority of the National Business Center (NBC) to obligate Head Start to the letter dated October 13, 2011. Grantees are required to apply for a fixed indirect cost rate. This is not a solution since they all have that now. Their issues are over- and under-recovery and shortfall. The current rate is 25.6%, so one of the concerns has been the financial stability of the organization. They must make up 10% from other sources. The Tribe is concerned that the resources used to cover the gap will not always be there.
- There will be an impact on resources used to close the gap. Tribes must satisfy auditors on financial status.
- The indirect rate must go hand-in-hand with the administrative cap. One program applies for the Non-Federal Share each year but is hemorrhaging money to keep Head Start going.
- There are a few types of rates that can be negotiated to carry from one year to another. Fixed carry forward allows over- and under-recovery. Head Start caps administrative costs at 15%, and this causes a shortfall. The future year's rate can be negotiated.
- Requesting a waiver seems to indicate that the community does not support Head Start.
- Tribal governments manage multiple programs including dental health, mental health, higher education, and tribal schools. They have limited money and resources; cuts will hit them harder. Though early childhood is at the top of their list, they have families without homes, food, and without livelihoods due to flooding. Any administrative cap will affect them. This is different from non-tribal Head Start. The structure is complex. The problems strain the relationship with tribal governments.

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- Head Start is the only Federal program that caps these expenses. Congress would have to change this.
- If Tribes raise wages, they have to cut transportation and family services. Heating bills are high, so in some cases there are no funds to move. It is important to identify the true costs of providing services and advocate to Congress about paying true costs.

Indirect Costs – Participant Recommendations to OHS and OHS Response

2011

- Establish temporary indirect cost rates even if the Federal fiscal year is not the same as the program's year.
- *OHS Response: In 2011, OHS facilitated clarification of existing authorities to address issue with indirect cost rates.*

Non-Federal Share (see also Indirect Costs)

2010

- In-kind allowances that were previously allowed are now disallowed (e.g. parent involvement). If indirect costs were allowable as in-kind, meeting Non-Federal Share (NFS) would be easier. The long-term/permanent solution is to reduce NFS from 20% to 5-10%. Waiver is short-term solution.
- Without OHS support, any legislative effort to lower NFS would fail.
- Tribal governments must balance their overall budget, not just Head Start budget. Just like Federal and state government, tribal-generated dollars are not as plentiful as they used to be.
- If a grantee does not meet NFS, they get monitoring finding. Programs do not understand that before the application is submitted, the NFS budget has to be realistic – based on what is going on in the community. The consequences are not advertised. This is problematic in Indian country where Head Start director turnover is 30-40% annually.
- Suggestion to include in the grant application package, sheet that discusses 1) what you must pay back if you do not make the match; 2) importance of the NFS budget; 3) making the NFS budget realistic and attainable; and 4) a clause that explains waiver process.

2011

- Recommend that ECLKC have examples for each of the criteria for NFS waiver.
- Recommend programs examine their in-kind valuation to make sure it is up-to-date. Questions arose about whether real estate and water could be counted as in-kind.
- The 20% threshold requires a lot of money and community effort. It may need to be revisited with consideration for community involvement.
- The 20% is not practical for small grantees.
- Tribes should self-determine NFS. The amount should be realistic and based on established costs. Antiquated administrative cost systems do not work for anyone.
- Can NFS be exempt from the administrative cap?

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Non-Federal Share – Participant Recommendations to OHS and OHS Response

2010

- Explain NFS and related processes in grant application package.
- Reduce NFS as a long-term solution rather than relying on waivers as a short-term solution.

- *OHS Response: Tribal grantees should be advised that unrecovered indirect costs may be claimed toward Non-Federal Share (NFS) requirement in certain circumstances. This can alleviate some of the expressed burden.*

2011

- Provide examples of NFS waivers on ECLKC.
- Examine at program level, in kind valuation and update.
- Allow Tribes to self-determine NFS.

- *OHS Response: NFS requirement is statutory. See also ACF-PI-HS-12-02 Non-Federal Share Issues, issued February 10, 2012.*

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BUSINESS PROCESSES

Policy Clarifications

2010

- Suggest notifying grantees when policy clarifications are updated, since policy clarifications for AI/AN are still listed as “under development” online.
- Cross references would be very helpful for consistency between grants and programs.

2011

There were no significant comments on this issue in 2011.

Policy Clarifications – Participant Recommendations to OHS and OHS Response

2010

- Notify grantees when policy clarifications are updated.
- Provide cross references for consistency.
- *OHS Response: The Regional Office, through Program Specialists, communicates OHS guidance and disseminates materials from the National Centers. AI/AN grantees can rely on their assigned Program Specialist as their point of contact for any needed policy clarification or explanation. If the Program Specialist cannot respond directly, they will refer the question or concern to the others in the Region who can address the issue.*

Criminal Background Checks

2010

There were no significant comments on this issue in 2010.

2011

- Some programs are hiring people with felony convictions, except those with convictions for child abuse or other abuse. As children grow older, they may see these individuals in their community and realize that their Head Start teacher was a felon. In some areas, individuals with felony convictions have more rights than law-abiding citizens. Tribe has policies/procedures that have a rehabilitation clause for ex-cons.

Federal Staffing

2010

- Federal staff turnover is high. When there is turnover, incoming specialists should call to introduce themselves to grantees.
- Program Specialists do not understand the conditions that Tribes deal with. One program service area includes nine school districts and 11 towns.
- Grants and Program Specialists do not talk to each other. Programs end up as the go-between for Grants and Program Specialists. It is difficult to get both Grants and Program Specialists on the phone at the same time.

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2011

- Change affects continuity. After a Risk Management Meeting (RMM), messages sent to one Grants Specialist were not forwarded to the replacement.
- It would be preferable to have an RPM for Region XI who could be there more than two or three years.
- After the Tribes develop trusting relationships, Federal staff are deployed elsewhere. OHS should be held accountable to train staff to work with Tribes. One location was told to close due to the few children enrolled but the nearest island was four hours away by boat. In the past, there was occasional progress depending on the leadership. The Tribes need honesty, transparency, and Program Specialists who attend meetings.
- Sharing Program Specialists means Tribes do not get their full attention. One grantee is now working with its third Grants Specialist and wants some assurance of staff retention. Consistency is the foundation on which to build progress. Many issues come back to inconsistency in Federal staffing and issues slip through cracks.

Federal Staffing – Participant Recommendations to OHS and OHS Response

2010

- Introduce new specialists to grantees.
- Improve communication between grants and Program Specialists.

2011

- Train Federal staff to work with grantees.
- Provide more consistent Program Specialists.
- *OHS Response: Region XI Program Specialists are committed to providing informed and high quality customer service to AI/AN grantees. The Regional Office intends to maintain consistency in assigned Program Specialists and will make changes only when staff changes require new assignments.*

Section 10 C. of the ACF Tribal Consultation Policy requires “all personnel working with Indian Tribes receive appropriate training on consultation, [the consultation] policy, and working with tribal governments.” This is responsibility that Region XI as a whole takes very seriously. As such, Program Specialists are provided professional development to enable them to provide accurate, informed, and responsive support to AI/AN grantees; respectful of principles of sovereignty and tribal authorities.

Regional Office leadership has many years of experience working with tribal governments and understands the principles of sovereignty and trust responsibilities, as well as applicable Federal laws governing relationships with tribal entities.

Interagency Cooperation

2010

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

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- Align Indian Education programs. It can be a separate program and be part of Department of the Interior, Bureau of Indian Affairs (BIA), or some other subset.

2011

- It can be difficult to get services from Indian Health Service (IHS), even with Memoranda of Understanding (MOUs). This strains the working relationship. IHS is the payer of last resort.

Interagency Cooperation – Participant Recommendations to OHS and OHS Response

2010

- Partner at the national level with other Federal agencies and programs for Tribes.
- *OHS Response: In coordination with Region XI, Indian Health Service (IHS) has conducted a number of health cluster trainings for AI/AN grantees. Through such trainings and interactions with AI/AN grantees, IHS has been able to develop new strategies for provide services to grantees.*

Region XI is strengthening its working relationship with the Tribal Affairs Group in the HHS Center for Medicaid Services (CMS) to increase the enrollment of children enrolled in AI/AN Head Start/EHS programs in state CHIP programs in order to increase access to available health care providers. At the 2011 OHS Leadership Institute, Region XI arranged for CMS to present information about state CHIP at the AI/AN Pre-Institute.

Regional Offices

2010

- Tribes are reluctant to have Regional Office provide assistance. Historically, tribal programs fear they will be pushed into Regions, and the AI/AN Program Branch will cease to exist. [Editor's Note: Please see OHS Response below regarding Regional Office assistance to Tribes.]
- It may take some time to get comfortable with Regional Office staff coming to tribal programs.
- Regional Office staff needs to be sensitive to AI/AN needs.
- Some ACF initiatives are important to families, but OHS cannot figure out how to work them in AI/AN or Migrant programs. Tribes should not have to miss out on these initiatives.

2011

There were no significant comments on this issue in 2011.

Regional Offices – OHS Response

2010

- *OHS Response: Regarding Tribes' reluctance to have Regional Office assistance – Region XI is the Regional Office dedicated to supporting and providing oversight to AI/AN Head Start/EHS grantees. Region XI is responsible for providing assistance, including technical assistance, support, and oversight to all AI/AN Head Start/EHS grantees.*

At the same time, Region XI is committed to working in partnership with Regions I, II, IV, V, VI, VII, VIII, IX, and X because they encompass all the states where AI/AN grantees are located. Such partnership is essential to Region XI's ability to leverage resources so that we may better support AI/AN grantee needs including, but not limited to training in areas that support School Readiness.

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DESIGNATION RENEWAL

Designation Renewal (see also School Readiness and Monitoring)

2010

- Suggestion to extend comment period to allow for tribal input.
- Most Indian nations are impoverished. Lifestyle and culture are being taken away. The idea of recompetition is grating. Some states do not want Tribes to exist. It is an issue of survival. It is important that the Federal Government recognize this.
- There is concern about OHS turning away from tribal programs (termination) and looking at state-run early childhood education programs. The possibility is that in tribal recompetition, money goes away from tribal grantee.
- There are areas where the state's school readiness goals do not align with tribal beliefs and goals. Putting school readiness in the hands of the state takes away power from Tribes and takes away what Tribes have done.
- There are regional nonprofits in Alaska (Tribes). Criteria should examine external factors such as whether there is a possibility of another entity to compete. Rural, remote programs are going to be disadvantaged.
- One deficiency is going to put nearly every tribal program into recompetition. There are 1,800 regulations. It is hard.
- Rural programs may be unable to complete CLASS certification online. Put the system on DVD.

2011

- Fiscal issues may cause Tribe to recompetete. This internal issue may not be addressed by OHS T/TA. In some cases, fiscal health may only be addressed internally by the Tribe.
- The Tribes do not believe that publishing in the Federal Register is method that fulfills the tribal consultation needs and requirements.

Designation Renewal – Participant Recommendations to OHS

2010

- Extend comment period to allow for tribal input.
- Make CLASS certification available on DVD.

Monitoring

2010

- Programs should educate their staff to be reviewers so there can be Native American reviewers, though it is hard to lose a good staff member when they go on a review.

2011

- Past review teams did not have enough members or enough time for thorough review.
- Few tribal reviewers are part of review teams. If OHS plans to impose strong conditions for designation renewal, they must train carefully and have tribal reviewers who are aware of the needs of Tribes and their conditions.
- Native reviewers should have experience living on reservations. They need first-hand knowledge. Tribal problems are not like city problems. Reviewers must have inside knowledge. There is concern about cultural sensitivity.
- An individual cannot make a living as a reviewer. Head Start employees are limited to conducting two reviews per year. Other reviewers are limited to 17.

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Monitoring – Participant Recommendations to OHS and OHS Response

2011

- Provide more reviewers and more time for tribal reviews.
- Include monitoring reviewers from Tribes.
- *OHS Response: Onsite monitoring is just one part of OHS’s 360° approach to grantee oversight and support. Onsite monitoring reviewers are trained extensively in the areas for which they are conducting reviews. The onsite monitoring protocol is available to all grantees so that all grantees are aware of what onsite reviewers will evaluate.*

Onsite monitoring reviews are only one part of the OHS 360° approach to Federal oversight and support under which areas of performance not up to established performance standards are identified and support provided to assist grantees in improvements.

All AI/AN grantees being reviewed receive 30-day notice of the exact dates of the onsite review and have the opportunity to provide any information related to conditions and circumstances that could have an impact on the review.

Regulations

2010

- There are more and more regulations. Suggestion to make CFR 130 into color-coded booklet so it is easier to discuss regulations with teaching staff.

2011

- Programs are subjected to more than 1,000 regulations [Editor’s Note: Please see OHS Response below regarding regulations.] in addition to the Information Memoranda (IMs), Program Instructions (PIs), and the broad discretion of Program Specialists.

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Regulations – Participant Recommendations to OHS and OHS Response

2010

- Make CFR 1301 into color-coded booklet.
- *OHS Response: program such as Head Start/EHS that provides so many comprehensive services directly and through referral to both children and their families and has the care and custody of very young children must have clear framework to ensure safety and quality. The Head Start Program Performance Standards make up such a framework, and compliance with the performance standards are terms and conditions of the grant.*

Region XI (and all Regions') Program Specialists are responsible for providing support to AI/AN grantees to understand what is required, in terms of performance, under the Head Start Program Performance Standards. Region XI has developed tools to articulate performance expectations and to support the development of training and technical assistance plans for grantees.

Risk Management Meetings

2010

- Programs are supposed to receive risk action plans following Risk Management Meetings (RMMs), but one program waited four months before receiving the plan. Then the program was asked about its follow-up.
- Suggest that programs specialists let programs know when they receive risk management information and have cleared it out of Enterprise System. Programs fear this could delay their funding.
- It would be useful to know who is on the call; also to give handouts prior to the consultations.
- It is feast or famine with unrealistic deadlines.
- RMM should be a working meeting between grantee staff and Program Specialist. There is no protocol from OHS. Without it being a working meeting, it is not clear who should be there. Reviewing and debating the SF-269 is not helpful.

2011

There were no significant comments on this issue in 2011.

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ELIGIBILITY AND ENROLLMENT

Disabilities

2010

- Head Start is finding, screening, and advocating for special needs children but programs are hitting a brick wall with public schools. Programs need help to get services on the reservation or coordinate with the State.
- What can OHS do to get Local Education Agencies (LEAs) to partner with Head Start or to recognize that Head Start has made a referral of a child?

2011

- For programs in small communities, the 10% requirement is unreasonable, especially with the requirement that Individual Education Plans (IEPs) be developed by LEAs. This is particularly difficult for children who have challenging behaviors because the LEA does not have a category for this.
- If there is not a Head Start in the community, how will the children get served other than waiting until kindergarten? Some Head Start programs have a year-long waiting list. There should be T/TA to help Tribes serve these children and develop relationships with LEAs. Memoranda of Agreement (MOAs) may be necessary to clarify rules and jurisdiction.
- In one area, parents are told that if they choose a tribal Head Start or Bureau of Indian Education (BIE) early childhood program and they qualify for special education, the school district will not provide services unless the child is enrolled in public preschool. It is frustrating when programs do not know the responsibilities of BIE and LEA. The Individuals with Disabilities Education Act (IDEA) does not provide BIE with funding for direct services. Recommend a national-level clarification of roles and responsibilities.
- If the parent chooses to use traditional methods, this means there is no diagnosis. So it is difficult for programs to have a documented case of disability. Programs need a form to document that the parent has been informed and has chosen to pursue traditional methods.
- OHS has demonstrated some of the flexibility with regard to looking at qualitative vs. quantitative. Programs were always told if it is not documented, it does not exist. So they are still in that mindset to look at documenting and not at quality.

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Disabilities – Participant Recommendations to OHS and OHS Response

2010

- Explore strategies to provide support for disability services on reservation and facilitate coordination with States, and LEAs

2011

- Provide T/TA to help Tribes serve children who are not in Head Start.
- Clarify roles and responsibilities at national level related to special education and public preschool.
- Provide culturally appropriate forms to document parental choice of traditional methods
- Reconsider 10% requirement if LEAs do not have a category for challenging behaviors.
- *OHS Response: The 10% requirement is a statutory requirement intended to ensure that children with diagnosed disabilities benefit from the comprehensive child and family support services that Head Start programs can provide. If, after making every effort to meet the 10% requirement, a grantee is not able to reach this target, a waiver is possible.*

OHS expects Head Start programs to provide parents with information and support services to enable and empower parents to be advocates for their children where screening or other information indicates children may be eligible for special services and supports under the Federal Individuals with Disabilities Education Assistance Act (IDEA).

Children with challenging behaviors may not have any disability as defined by IDEA. The Regional Office has provided technical assistance, including materials, to support grantees in the areas of professional development of teaching staff, as well as supervision and family supports to address challenging behaviors.

Eligibility and Enrollment

2010

- Participants asked for clarification on whether tribal program can enroll over-income tribal members over income-eligible non-Indian children. Also if there is a regional Head Start program in the service area, is it allowable to enroll an over-income Indian child and refer income-eligible non-Indians to the other program? Income eligibility is a “hugely frustrating” issue for Tribes. Some Head Start programs are competing out of their service areas with AI/AN grantees.
- Participants also asked for clarification on class size waiver to avoid being cited for under-enrollment. Some programs have difficulty enrolling enough 4-year-olds because those children enroll in public school pre-k.

2011

- There were 1 participants at one Tribal Consultation who attended Head Start and are now professionals. Their children cannot go to Head Start because they are over-income. Head Start should be more flexible. Tribal leaders cannot consider income eligibility because their responsibility is to everyone.

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Eligibility and Enrollment – Participant Recommendations to OHS and OHS Response

2010

- Clarify whether a tribal program can enroll over-income tribal members over income-eligible non-Indian children.
- Clarify whether a tribal program can enroll over-income Indian children while referring income-eligible non-Indian children to a regional Head Start program in the same service area.
- *OHS Response: Clarification depends on the tribal grantee's service area, where children are located. See 1305.4 (b)(3) where the conditions for tribal programs being able to serve over-income families are described.*
- Clarify the class-size waiver to help programs avoid under-enrollment.
- *OHS Response: The requirements for a waiver of center-based maximum class size are described at 1306.37.*

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FACILITIES

Facilities

2010

- Tribes have inadequate facilities to accommodate children. Issues include bringing buildings up to code. Programs do not have funding to improve facilities to follow state/Federal regulations.
- Communities need more culturally appropriate equipment such as tribal dugout canoe as playground equipment so children can reconnect with the culture.
- Recommendation that programs work with National Indian Head Start Directors Association to provide OHS with inventory of facilities, age, condition that OHS can share with legislators.
- There is high cost of doing business in Alaska. The agency kicks in \$200,000 for utilities and the insurance is going up (40% rise in health insurance). Some sites have no running water. Programs may need to reduce slots in order to keep the lights on.

2011

- From Sisseton Wahpeton Oyate: Tribal leadership has provided two new buildings and started a natural playground development on 2.5 acres. The program studied the Reggio Emilia Approach and looked at how children learn naturally and how to show who they are as a Tribe. The natural playground will have teepees as learning centers. It will incorporate water centers as we are a fishing community. It will have a powwow ground so children can dance and learn. There will be gardens and fruit-bearing trees so children can learn how to make traditional foods; composting so they can learn about the environment; and wind turbines for generating energy. It was the community's idea and that is what Head Start is about. Parents, children, tribal elders, community, and health center all had input. More funding is needed.
- Provide more flexibility to use funds for things such as expanding facilities.
- Consider adding content experts to help with facilities issues. Tribes need experts on permafrost. National Centers provide great resources and support on quality but in rural Alaska, Tribes need facilities expertise.

Facilities – Participant Recommendations to OHS

2011

- All programs more flexibility to use funds for uses such as expanding facilities.
- Consider adding content experts to help with facilities issues.

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FAMILY ENGAGEMENT

Family Engagement (see also Health and Language and Culture)

2010

There were no significant comments on this issue in 2010.

2011

- The effort to meet the *Head Start Program Performance Standards* creates a disconnect with the parents. Programs requested more training/tools for teachers/family service workers.
- It is easier to get parents involved when the children are birth to three. Parent involvement has huge impact on the child. Children learn culture, history, background, understanding of themselves from their parents.
- One Tribe struggles with parents who are dealing with substance abuse. There are families that will not open the door to Head Start staff. Every parent wants the best, but they do not always do the best. The Tribe has a language program and a grant for language revitalization and conducts community assessment and self-assessment to find out what parents/community want. How can a Tribe handle monitoring reviews when parents refuse to follow up on referrals, etc.?

Family Engagement – Participant Recommendations to OHS

2011

- Provide more training/tools for teachers/family service workers.
- Clarify how Tribes can address monitoring reviews when parents refuse to follow up on referrals, etc.

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

HEALTH

Health

2010

- Disparities of Native children are obvious.
- Near the Canadian border, there are issues with childhood diabetes/obesity. It is difficult to increase children's activity when the climate is so cold.
- More money is spent on prison healthcare than at Indian Health Service (IHS) for community health. Head Start depends on IHS even though they are only funded at 60%. Programs have trouble getting doctors to accept welfare. IHS is doing a good job screening Native and non-Native children.
- OHS health specialists believe that if programs connected with IHS, they would not have problems. But there can be a 6-10 month wait for a medical visit. Programs have to collect many Early Periodic Screening, Diagnosis, and Treatment (EPSDT) exams, and there is lag time. Programs need OHS to understand the work that is done on a daily basis.

2011

There were no significant comments on this issue in 2011.

Health – Participant Recommendations to OHS and OHS Response

2010

- Develop understanding of tribal Head Start daily operations and their impact on children's health and health services.
- *OHS Response: Region XI and the Indian Health Service (IHS) have collaborated and coordinated in support of AI/AN grantees in the following ways:*
 - *Joint participation in monthly meetings of the Oral Health Workgroup, November 2010 to present, for the purpose of identifying best practices as well as resources to disseminate to grantees.*
 - *Jointly provided resources to grantees on topics such as obesity prevention, diabetes, oral hygiene, immunizations for grantees as a result of identified needs by Program Specialists or other regional specialists.*
 - *Coordinated with IHS to review Environmental Health and Safety Inspection reports for grantees with facilities issues identified through onsite monitoring reviews, Program Specialist visits, or calls with grantees.*
 - *Joint review with IHS of architectural plans for grantees who are in process of construction or major renovation of Head Start facilities in order to provide expert and authoritative support to grantees.*

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

Mental Health

2010

- Request for clarification of mental health services requirement. Access to mental health is difficult because of stigma. It is the parents' decision, but the program gets cited.

2011

There were no significant comments on this issue in 2011.

Mental Health – Participant Recommendations to OHS and OHS Response

2010

- Clarify the mental health services requirement. Access to mental health is difficult because of stigma. It is the parents' decision, but the program gets cited.
- *OHS Response: There is nothing in the Head Start Program Performance Standards that requires programs to ensure parents access mental health services. However, the performance standards do require programs to "secure the services of mental health professionals" to enable timely identification of and intervention in family or staff concerns about children's mental health. Programs are also required to provide onsite mental health consultations involving mental health professionals, staff, and parents.*

Oral Health

2010

- In rural settings, it can be 1-2 hours to the nearest dentist. Programs can provide transportation, but if the parent does not follow through, the program is cited. How can programs demonstrate that they have done all they can?
- Even the American Dental Association (ADA) cannot get dentists to go out to programs. There is no relationship between the American Academy of Pediatric Dentistry (AAPD) and Alaska Head Start. At the state level, there is no commitment between local dentists and leadership to keep going with State Collaboration money.

2011

- Rules of dental care are unfair due to backlog for services.

Oral Health – Participant Recommendations to OHS

2010

- Clarify how programs can demonstrate due diligence when parents do not follow through.

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

SOVEREIGNTY

Consultation

2010

- What is the timeline for implementation of actions discussed in last year's tribal consultations? Will someone provide updates on the Website?
- Tribes are asked to attend too many consultations. Federal agencies should standardize and coordinate their consultation requests.

2011

- There is frustration about tribal consultations, and it is hard to encourage some tribal members to attend. Fortunately, the Alaska Head Start directors sit at one table and hear about Region X and Region XI. There are mixed messages from Program Specialists and Grants Specialists.
- Tribal consultations are little more than tedious required routine. Comments are summarized by topic without acknowledgement by the speaker, and no reports of change are provided after the consultations. Promises are not fulfilled. Tribes do not have time for consultations that do not meet goals. Thus there is dwindling participation.
- There is a need to communicate needs to and from the Federal Government.

Consultation – Participant Recommendations to OHS and OHS Response

2010

- Clarify the timeline for implementation of actions from 200 tribal consultations.
- Provide updates online
- Coordinate consultations with other Federal agencies.

2011

- Ensure that messages from Program Specialists and grantee specialists do not conflict.
- Report on changes and status of recommendations after Tribal Consultations.
- *OHS Response: Beginning in 2011, as much as possible, the OHS Tribal Consultations have been scheduled to "piggy back" immediately preceding or following HHS Tribal Consultations in order to ease travel and financial burdens on AI/AN grantees.*

No later than 90 days after the conclusion of each 2012 OHS Tribal Consultation, OHS will issue a detailed report of the consultation to AI/AN grantees. In addition, Region XI will provide regular updates on the status of issues raised in consultations.

Not all issues raised in consultations can be addressed by either OHS or the Regional Office because they require legislative resolution.

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

Program Governance

2010

- Term limits of the Policy Council should be changed. Programs are running out of parents who are eligible to participate.
- Tribal Preference Policy is one of several policies when it comes to hiring. Parent Policy Council picks non-tribal members in their hiring process when there are qualified tribal members for the position.

2011

There were no significant comments on this issue in 2011.

Program Governance – Participant Recommendations to OHS and OHS Response

2010

- Change term limits of Policy Council to allow more parent participation.
- *OHS Response: This requires a regulatory change.*

Unannounced Visits/Tribal Sovereignty

2010

- OHS should take tribal input and consider tribal concerns. Tribes take sovereignty very strongly and hold OHS to that.
- It is a breach of protocol for the Federal Government to enter sovereign nations without written request. Talking to the board is not same as talking to tribal leaders. This means written permission, not notification. Tribes are concerned with lack of respect and lack of communication.

2011

- Tribes need flexibility to develop programs appropriate for their community to exercise sovereignty.

Unannounced Visits/Tribal Sovereignty – Participant Recommendations to OHS and OHS Response

2010

- Consider tribal input and concerns with regard to unannounced visits.
- *OHS Response: OHS and Region XI understand an essential component of tribal sovereignty is the authority of Tribes related access to tribal land. All onsite monitoring or other visits to AI/AN grantees are preceded by no less than 30 days advance notice.*

2011

- Allow flexibility for Tribes to develop programs appropriate for their community to exercise sovereignty.

SUMMARY OF ISSUES AND RECOMMENDATIONS

OHS TRIBAL CONSULTATIONS IN 2010 and 2011

Understanding Indian Country

2010

There were no significant comments on this issue in 2010.

2011

- Federal office should be more responsive with Region XI.
- Recommend an advisory board for tribal issues.
- Recommend an “Indian Desk” at the Regional Office. This would allow OHS and tribal programs to learn from each other; discuss innovative ideas that are culturally based and provide justification for meaningful programs and projects that do not deviate from the *Head Start Program Performance Standards* (HSPPS). This direct link to the Regional level would give tribal programs the opportunity for more meaningful dialogue, allowing programs to express the true nature of challenges such as poverty and large, land-based reservations. It would help OHS understand that all tribal programs are not alike. An Indian Desk would help tribal programs feel that they are inside the main channel of communication and funding. This would put AI/AN at the table with all the discussions.
- Recommend a database to help Tribes show the importance of Head Start. Tribes need to show Head Start is working in Indian Country and want to prove that negative articles are inaccurate. Required annual reports can include statistics and report successes. The reports can be offered publicly and Head Start can use the information. Tribes also can collaborate with school systems and share that information.
- Recommend that OHS follow a “best practices” example set by the National Tribal Advisory Committee on Behavioral Health with IHS, which focuses on efforts that have been practiced for decades/generations.
- The Indian Head Start is one of the most important and successful Federal programs for Native children thanks to its focus on the holistic approach.
- Alaska has special issues to address due to its complexity, the regulatory process is a concern and Congressional authority is required to make changes.

Understanding Indian Country – Participant Recommendations to OHS

2011

- Be more responsive to Region XI.
- Form an advisory board for tribal issues.
- Create an “Indian Desk” at the Regional Office to allow OHS and tribal programs to learn from each other.
- Develop a database to help Tribes show the importance of Head Start.
- Follow “best practices” example set by the National Tribal Advisory Committee on Behavioral Health with IHS, which focuses on efforts that have been practiced for decades/generations.

SUMMARY OF ISSUES AND RECOMMENDATIONS

OHS TRIBAL CONSULTATIONS IN 2010 and 2011

TEACHING AND LEARNING

Curriculum (see also Language and Culture)

2010

- Regarding scientifically-based curriculum, Tribes know the drum's vibration releases a chemical in the brain that has an effect on the human body. A study found that cradle-boarded children do not die of SIDS. Programs should capitalize on traditions.

2011

- There are few curricula that are focused on tribal programs. It takes only one generation to lose language. Tribes fear that children are losing their heritage language. A Tribe's cultural and linguistic curriculum should be honored by review teams.
- There are many Native communities developing curricula and trying to revitalize Native language. HSPPS and scientifically-based approaches create barriers for programs that fear the children will not pass assessment and do well in school. OHS should consider ways to support Head Start/EHS in teaching language, especially those programs doing full immersion and trying to develop curriculum reflective of their communities. Speaking Native language will not hinder acquisition of English or performance. Alternative assessment is an area that can help.
- It is critical that programs understand how to articulate this to reviewers so they understand what programs are doing culturally.

Curriculum – Participant Recommendations to OHS and OHS Response

2011

- Consider ways to support Head Start/EHS in teaching language, especially those programs doing full immersion and trying to develop curriculum reflective of their communities.
- *OHS Response: OHS and the Head Start Program Performance Standards have always supported Native and local community's language and culture. OHS and the Regional Office support Native language preservation, maintenance, and Native language learning in Head Start/EHS programs.*

The Regional Office has worked closely with the National Center for Cultural and Linguistic Responsiveness. Examples of materials developed specifically for AI/AN programs include the tool, "Making It Work! A Process for Joining Cultural Learning Experiences in AI/AN Communities/Classrooms with the Head Start Child Development and Early Learning Framework (CDELF)" and an expanded Language Preservation, Maintenance, and Reclamation Catalog due in March 2012.

With regard to curriculum, 1304.21 (a)(1)(iii), for example, provides that Head Start program's "approach to child development an education . . . provide an environment of acceptance that supports an respects gender, culture, language, ethnicity, and family composition."

In another example, 1304.21 (a)(3)(i)(E), provides that children's development be encouraged through support and respect of children's language an culture.

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

Language and Culture (see also Teacher Qualifications/Staff Retention and Curriculum)

2010

- Language and culture should be incorporated into family engagement. This would be an incentive for family participation.
- There are number of grantees with Native speakers who are teachers that could be losing them because they are not going to be able to get CDAs, etc.
- Teaching language is about teaching respect for land and ancestors, how to survive, pride and confidence in who they are. Being able to speak two languages expands their minds. Language is not taught to teachers.

2011

- Jemez is the only pueblo where Towa is spoken. Head Start serves children through culturally and age appropriate approaches. Implementation of language immersion program utilizing traditional calendar and Towa curriculum is happening in Head Start. More than half of enrolled children are fluent Towa speakers. There is a partnership with Arizona State University in Jemez language and cultural priorities to develop curriculum.
- There should be holistic approach. Head Start is not just education; it is child development and the basis of how children learn, especially language and culture.
- One Tribe has a teacher who is certified by the state to teach Native language as lead teacher. But she cannot teach Head Start since she does not meet the early childhood requirements.
- Leaders should make news of their plight available to the National Congress of American Indians. Tribal languages should be passed on to children.
- There is need to ensure full compliance, quality services, vision, and not to lose cultural identity.
- Language and culture are intertwined with monitoring review teams and T/TA. If review teams used Head Start directors, there would be more positive responses to reviews.
- Recommend that successful Tribes offer Webinars and allow other programs to contact them about successful strategies.

Language and Culture – Participant Recommendations to OHS

2010

- Incorporate language and culture into family engagement.

2011

- Include more Head Start directors on monitoring review teams.
- Encourage successful Tribes to offer Webinars and allow other programs to contact them about successful strategies.

Research

2010

- There is little current research that references AI/AN. There are some projects with the Universities of Colorado, Mississippi, and Oklahoma. How can we continue that for childhood obesity, language, and culture?
- The Head Start Act discusses studies for funding allocation, curriculum. The major one was determining number of eligible kids, and one o facilities. The facilities report looks at conditions and how programs can more appropriately serve children. It is broad. It does not indicate priorities.

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

2011

There were no significant comments on this issue in 2011.

Research – Participant Recommendations to OHS

2010

- Clarify how Tribes can further support AI/AN research at universities.

School Readiness

2010

- Comments were limited to Designation Renewal (see Designation Renewal)

2011

- Programs asked for guidance on how to explain school readiness to staff and on who will determine whether children are ready for school.
- For Indian country, working with the Local Education Agency (LEA) could mean parochial, public, Bureau of Indian Education (BIE), or tribally controlled schools. It is very complex.
- Programs should recognize that OHS is not asking them to do any more than they already are doing. OHS is asking programs to document it and use this information to make sure programs are doing what school districts are doing and what parents are asking. Programs need to meet with LEAs and discuss expectations. A lot of Head Start programs are already doing this. It is just matter of documenting it in terms of where you are now and where you want to be.

School Readiness – Participant Recommendations to OHS and OHS Response

2011

- Understand complexity of working with LEAs in Indian context.
- Provide guidance on how to explain school readiness to staff and on who will determine whether children are ready for school.
- *OHS Response: Beginning in late Fall 2011, Region XI Program Specialists have conferred with AI/AN grantees to discuss school readiness for the purpose of identifying the specific areas for which grantees can use more support and technical assistance.*

Teacher Qualifications/Staff Retention (see also Language and Culture)

2010

- Staff retention is difficult. Many teachers leave for higher paying jobs after earning certification. When requirements increase, there should be money appropriated to pay staff what they deserve. In some Tribes, the population is too small to recruit qualified teachers and these Tribes can become non-compliant.
- Funding is needed for teacher credentialing at the local level. Many staff are single parents and cannot afford to quit work to go to school, but they do not qualify for education grants unless they are full-time students. When teachers go for classes, programs have to hire a substitute. Tribe funds that, not Head Start. This is a crisis.
- Head Start director turnover in AI/AN is 45% annually. There should be mandated training that gets the 153 grantees together to learn how the Federal and tribal governments should interact.

SUMMARY OF ISSUES AND RECOMMENDATIONS

OHS TRIBAL CONSULTATIONS IN 2010 and 2011

- We are on track for 100% but at high cost to language/culture. Recommend that tribal Head Start get a dispensation that 25% of staff get an alternate route to credentialing if they are documented language speakers or are native to the area.
- Cost for child in EHS is higher than Head Start and appropriations should reflect that.
- Tribal colleges should grant credits for life skills and knowledge.
- Programs need guidance on related degrees that can count toward credentialing.

2011

- Programs asked for clarification on how to retain teaching staff who have earned their degrees when public school salaries are higher; how to require staff to repay education assistance if they leave before three years; and whether programs should continue to promote CDAs when the push is for AA/BA.
- Tribal colleges charge for credits, and programs have to pay.
- If a person is enrolled in a program and the CDA expires, there is a rationale not to renew the CDA when they are taking courses to obtain an AA.
- There is high turnover of teachers in EHS, and it is hard to get credentials to meet requirements. The issue of supervision and training is critical for infants and toddlers.
- CDA can be a barrier because sometimes progress toward a degree stops. It can take 6-10 years to get a degree.
- In Washington, there is allowance for people to be certified teachers who have lifelong experience as teachers. There is still long way to go in Head Start. OHS is trying to encourage tribal colleges to ensure credit for teaching experiences. The conversations should be between a tribal nation and a tribal college.
- Tribes are expected to provide continuity of care to children. They try to hire the best teachers from communities and hope they stay. It is fair to expect the same commitment from Region XI.
- Because of the level of education required, some Head Start employees lose their positions. Several small communities cannot find workers. People are trying to catch up with the requirements, but funding stays the same. They are in competition with other organizations offering higher pay. Expenses and competition are high.
- pressing issue is 2007 legislation on staff credentialing. The program sent a waiver request in September and has not had response. They also sent waiver on teacher qualifications and have not heard back. There is no local CDA advisor or local college for AAs. One employee would have to move to another city to complete the requirements. Teacher requirements seem to decimate tribal classrooms.

SUMMARY OF ISSUES AND RECOMMENDATIONS

OHS TRIBAL CONSULTATIONS IN 2010 and 2011

Teacher Qualifications/Staff Retention – Participant Recommendations to OHS and OHS Response

2010

- Provide funding to programs to pay for staff who earn certification.
- *OHS Response: Additional funding for teaching and other staff wages are a legislative/ appropriations issue.*
- Provide funding for staff to pay for their credentialing courses.
- Mandate training for all AI/AN Head Start grantees to learn how the Federal and tribal governments should interact.
- Allow 25% of staff to get an alternate route to credentialing if they are documented Native language speakers or are native to the area.
- Encourage tribal colleges to grant credits for life skills and knowledge.
- Provide guidance on related degrees that can count toward credentialing.

2011

- Clarify how to retain teaching staff who have earned their degrees when public school salaries are higher.
- Clarify how to require staff to repay education assistance if they leave before three years.
- Clarify whether programs should continue to promote CDAs when the push is for AA/BA.

SUMMARY OF ISSUES AND RECOMMENDATIONS OHS TRIBAL CONSULTATIONS IN 2010 and 2011

TRAINING AND TECHNICAL ASSISTANCE

Training and Technical Assistance

2010

- Tribes do not want to get rolled into state T/TA.
- Tribal programs can learn from other tribal programs that are 100% compliant to see how those best practices can be applied.
- Too many times, the T/TA provider does not focus on doing quality job and meeting the scope of work, but on how much money they can spend.
- Some staff have to travel long distances for training; it is very costly. T/TA money does not stretch nearly as far as it needs to.
- Percentage for T/TA should be divided differently.
- Participants ask about rumors of restructuring the T/TA Network for AI/AN. There is concern that Grantee Performance Support Specialists (GPSSs) will no longer be specifically assigned grantees because the relationship that has been built by the GPSSs with their grantees is based on trust.
- There is concern that tribal programs will lose their assigned specialist for length of time while he/she is temporarily assigned to another program. Also there is concern that a tribal program that needs targeted T/TA may be sent a grantee specialist who may not understand tribal Head Start.
- An individual T/TA provider will not be able to correct a drastic issue that is there for years.
- Tribal chairs are kings and queens in Indian country. OHS must recognize them and involve them before you make decisions that impact our nations.
- Tribes do not have voice in changes like this.
- T/TA support will be more difficult just as Tribes are being considered for recompetition.

2011

- The change in the T/TA network has added another layer of bureaucracy. One program has had to wait more than five months for T/TA, despite a conference call with OHS staff to discuss its concerns.
- Programs used to be able to contact ICF directly, but now must go through the Program Specialist. This is not working. A request for training has not been met.
- Programs are concerned with OHS's inability to provide T/TA in accordance with the Head Start Act which includes understanding of the unique political and cultural environments in which we operate.
- The current T/TA system has resulted in programs not having hands-on training that had previously been available. This change came about after programs already submitted budgets, before realizing they would have to bring in outside trainers. Tribes feel like they do not have a T/TA system anymore. They can get quick response over email, but cannot get in-depth assistance because the T/TA providers can only go to programs most in need.
- T/TA providers should have expertise in content area, but also have an understanding of Head Start systems.
- For administrators, interpretation of compliance and regulations is important. Administrators need help to become more business-focused and to develop expertise.

SUMMARY OF ISSUES AND RECOMMENDATIONS

OHS TRIBAL CONSULTATIONS IN 2010 and 2011

- T/TA providers need to understand the *Head Start Program Performance Standards (HSPPS)* because that is what programs have the most questions about. It is not necessary to have them know about culture. It is a plus, but they need to understand regulations.
- Tribes were not notified until September 13, 2011, that the T/TA system was being changed.
- There is need for T/TA and Program Specialists to communicate. The T/TA contractor is viewed as a buffer to get things in order before Federal involvement. There is need for good communication to build a team.
- T/TA is broken. The Tribe must go through a Program Specialist for T/TA. OHS selected a provider that neglected Tribes for the last three years. Tribes want providers that live in Alaska and have a background working with Tribes.
- OHS should consider special needs and carefully orient providers. Recommend pairing mentor directors with a new director.

Training and Technical Assistance – Participant Recommendations to OHS and OHS Response

2010

- Divide T/TA funding percentage differently.
- Recognize the stature of tribal chairpersons in their communities and involve them before making decisions that impact tribal nations.

2011

- Ensure that T/TA providers have expertise in a content area, as well as an understanding of Head Start systems.
- Provide T/TA to Head Start program administrators to become more business-focused and to develop expertise.
- Ensure that T/TA providers understand HSPPS because that is what programs have the most questions about.
- Encourage T/TA providers and Program Specialists to communicate.
- Pair mentor directors with new directors.
- *OHS Response: The Program Specialists in the Regional Office are each grantee's point of contact and "first responders" for training and technical assistance needs. Program Specialists are building their content area expertise through ongoing professional development using the resources of the OHS Central Office, as well as the expertise available through the National Centers.*

At the point when contractor T/TA providers become part of the Region XI Training and Technical Assistance Center, the Region will ensure that such providers have the relevant expertise and knowledge, and work collaboratively with Program Specialists to effectively support AI/AN grantees.