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Response to the Request for Information on

Office of Head Start Tribal Programs

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Submitted to:

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Response to Request for Information: Office of Head Start Tribal Programs

The Office of Head Start (OHS) plays a critical role in supporting early childhood education for Native American children and their families by providing resources, guidance, and funding for Tribal communities. This request for information offers an important opportunity to enhance the reach and effectiveness of American Indian and Alaska Native (AI/AN) Head Start programs by ensuring they are flexible, culturally responsive, and aligned with the unique values, languages, and traditions of Tribal Nations. Our response addresses how OHS can better support Tribal programs in implementing culturally grounded practices, strengthening family and community engagement, addressing workforce challenges, and ensuring sustainable program operations—all while upholding Tribal sovereignty.

Mathematica staff who are Tribal citizens prepared this response, which draws on our experience providing training and technical assistance (TTA) for Tribal early childhood development programs, promoting Tribal sovereignty in federal programs, supporting Tribal Nations in their self-determination toward culturally relevant curricula and language revitalization efforts, and promoting innovation within existing flexibilities in program design. We aim to offer meaningful and action-oriented recommendations that offer ways to elevate Indigenous knowledge and practices, improve collaboration with state and federal entities, and ensure that Tribal programs have the resources needed to meet the diverse needs of their communities.

Item-by-item responses

A.1. Eligibility Processes

While Tribal communities have diverse cultural norms and social structures, and many emphasize kinship networks, extended family care, and communal living arrangements. These distinctions from non-AI/AN Head Start programs can complicate the eligibility processes in AI/AN programs. Several key recommendations follow that could help improve how eligibility is determined in a way that respects Tribal sovereignty and cultural values.

Flexibility. Eligibility processes for AI/AN Head Start programs should allow for more flexibility to account for complex family dynamics and non-traditional living arrangements, such as kinship care or multigenerational households. Current regulations, although offering some leeway, do not fully accommodate these family structures, which can lead to unintended exclusions of eligible children. Culturally responsive eligibility criteria would enable Tribal programs to better serve their communities.

Culturally aligned verification. Existing eligibility verification methods often do not align with Indigenous cultural practices. For instance, reliance on income documentation might not reflect how support networks function in some Tribal communities. Developing culturally appropriate practices for verifying eligibility—such as using community-based referrals or alternative documentation methods—would better reflect the reality of Indigenous family structures.

Technical assistance and training. Programs would benefit from additional TTA that is specifically geared toward culturally competent eligibility determination. TTA could provide

resources on how to apply federal guidelines in a way that respects Tribal sovereignty and the specific needs of Indigenous families.

A.3. Enrolling Children and Families Experiencing Homelessness

Housing insecurity is a pressing issue in many Tribal communities, but the standard definition of homelessness does not always align with Indigenous cultural practices. For instance, families might live in multigenerational or extended kinship care settings that do not meet the formal criteria for homelessness, even though they face similar vulnerabilities.

Cultural adaptation of terms and definitions. Terms such as *homelessness* might not fully capture the mobility or housing instability experienced in many Indigenous communities. Not all mobility or kinship care is a vulnerability. Programs should have more flexibility to adopt culturally resonant terms, such as *Indigenous mobility* or *kinship care*, to support distinctions between traditional living practices and actual vulnerabilities. Focusing on the specific vulnerabilities Indigenous children face—like long-term housing instability—will help to identify children and families in need.

Removing stigma. In many Tribal communities, families can be hesitant to self-identify as homeless due to the stigma associated with the term. TTA should focus on helping programs address this barrier and offer alternative, less stigmatizing language.

Enhanced support for mobile families. Tribal communities often experience significant mobility for economic, cultural, or social reasons. Offering additional resources and TTA focused on enrolling children in these situations—without rigid residency requirements—would reduce barriers for these families.

B.1. Program Options

AI/AN Head Start programs are diverse, and flexibility in program design is crucial to meeting the unique needs of Tribal communities. Locally designed options (LDOs) provide an opportunity for programs to integrate traditional cultural practices while delivering high-quality education. However, improvements could enhance the implementation of these options.

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

Responsive TTA. TTA should focus on providing resources that support the development of LDOs grounded in Indigenous values, languages, and traditions. Case studies of successful program designs could serve as models for other communities to adapt to their own contexts.

C. Quality Environments

Indigenous communities and their worldviews have tremendous heterogeneity and they generally emphasize cultural and community connectedness, extended kinship networks, and traditional language learning (see here, here, and here). Next, we outline a number of the drivers of success for high-quality child care learning frameworks, curricula, and physical learning spaces in Tribal communities.

Flexibility. When considering how best to support high-quality teaching and learning environments in AI/AN Head Start programs, it is critical to recognize that markers of quality vary depending on a community's values. Because of the heterogeneity across these communities, flexibility to tailor services in culturally responsive ways supports child care quality. For instance, the remote or rural locations of many Tribal communities might mean programs face challenges in securing or maintaining adequate infrastructure. Flexibility in requirements around program aspects such as physical space may allow programs to more easily overcome barriers.

Cultural connections. The imposition of non-Indigenous practices or lack of culturally responsive approaches in child care settings can lead to cultural disconnection, which can undermine the cultural identity and well-being of Indigenous children. Instead, programs and services that incorporate, elevate, and respect these Indigenous customs, values, and Indigenous Ways of Knowing are likely to be more effective than those that do not (see here, here, and here). The physical spaces housing AI/AN Head Start programs should be safe and reflective of the community.

Professional development and training. Investing in training programs that emphasize cultural competency and understanding of the specific needs of Indigenous children is important for child care quality. Both funding and capacity-building technical assistance efforts are needed for AI/AN Head Start programs to support curriculum development and implementation efforts that draw on the strengths of local culture, language, stories, and knowledge. Mathematica supported the Administration for Children and Families (ACF) in designing a cross-cultural understanding and cultural humility training for early childhood researchers working with AI/AN communities—based on training materials developed for the AI/AN Head Start Family and Child Experience Survey. ACF could tailor this training to support service providers.

Community involvement and family engagement. Strong community involvement, including collaboration with Tribal Elders, leaders, and families, plays a pivotal role in ensuring that child care programs align with the community's needs and values. Involving families in children's care and education and providing support services that address their needs and challenges contribute to a holistic approach to child care quality.

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

Each Native language embodies a living repository of ancestral wisdom, cultural identity, and a unique worldview. As such, language revitalization holds profound significance for Tribal Nations and Indigenous communities, serving as a protective factor that safeguards cultural heritage and fosters community well-being.

As mentioned in Section C, designing curricula that support Native language learning takes time, effort, and expertise, and benefits from the participation of local community members, especially Tribal Elders or language users (including speakers, writers, or signers).

Provide adequate time and resources to understand the current landscape of Native language use. The Durbin Feeling Native American Languages Act of 2022 established federal support for a national survey on revitalizing, maintaining, and using all Native American languages in the United States. The Administration for Native Americans (ANA) within ACF, U.S. Department of Health and Human Services, is responsible for designing and implementing a survey to understand the status of all Native American languages spoken among AI/AN Tribes, Native Hawaiian and Pacific Islander communities, and distinct Native American language communities in the United States (more information about the legislation and the draft survey and design plan developed by Mathematica is available on ANA's website).[1] With this investment, future survey data will inform ACF's interagency efforts and policies to better support efforts to revitalize Native languages, which will likely have an impact on child care programs like Head Start that have demonstrated a vested interest in supporting Native language use in the classroom.

Provide funding and technical capacity-building supports to programs interested in developing or refining curricula to support Native language use. Programs should receive funding opportunities at different phases of development (such as those recently announced under the Native American Language Preservation and Maintenance program and Esther Martinez Immersion program).

Support communities of practice or ways for programs to share lessons learned, promising practices, or solutions to common challenges. Across the country, programs have designed and applied innovative approaches to incorporating Native language, ranging from developing educational resources such as dictionaries to facilitating opportunities for immersion, such as language nests or intergenerational learning spaces. Providing opportunities and resources for programs to share and connect with others can promote understanding of and expansion of best practices.

Respect Tribal sovereignty around the intellectual property or privacy of language resources. Communities should be in full control of the program materials containing Native language and cultural references that they design.

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[1] To develop the draft survey for the National Native Languages Survey project, Mathematica collaborated with a Community Work Group and synthesized feedback from federal Tribal consultations and listening sessions and public feedback to inform the design.

F.   Family and Community Engagement

Family and community engagement are central to the success of AI/AN Head Start programs, as Tribal communities often have unique family structures and a deep sense of communal responsibility for raising children. Several suggestions follow for how OHS can better support engagement efforts in AI/AN programs.

Engaging extended family networks. In many Indigenous communities, child-rearing is a communal effort that involves extended family members, including grandparents, aunts, uncles, and Elders. Providing more flexibility in family engagement requirements enables programs to actively engage extended family members in educational activities. Programs could also benefit from additional guidance on how to create multigenerational learning opportunities that incorporate traditional cultural practices.

Culturally responsive family engagement strategies. Family engagement strategies that work in non-Indigenous communities might not always be effective in Tribal contexts. OHS should support AI/AN Head Start programs in developing culturally responsive family engagement approaches that reflect the values, practices, and structures of the community. These community-based approaches include organizing family participation in cultural events, such as seasonal celebrations or ceremonies, and creating opportunities for families to share traditional knowledge with their children in the classroom.

TTA on trauma-informed family engagement. Given the historical and ongoing trauma experienced by many Indigenous communities—particularly the role the federal government and educational institutions have played in the genocide of Indigenous peoples and the destruction of Indigenous identity and communities—AI/AN Head Start programs would benefit from increased training on trauma-informed care. OHS should expand its TTA offerings to include resources on how to create supportive, healing environments for children and families affected by trauma, including the effects of historical trauma, substance abuse, and mental health challenges.

G.1.   Retention, Recruitment, Compensation, and Benefits

ACF supports an early childhood sector that can meet the developmental needs of and create equitable opportunities for children and families. This includes supporting systems that attract, prepare, support, and retain a qualified and diverse workforce, including Head Start. President Biden's executive order on Increasing Access to High-Quality Care and Supporting Caregivers also calls for increasing wages and benefits for staff, increasing provider payment rates, and improved access to mental health supports for the workforce. OHS's recently proposed requirement changes to increase wages, expand benefits, and enhance supports for staff health and wellness align with that goal, but many AI/AN Head Start programs experience frequent internal challenges to increase wages or retain qualified staff. The Office of Planning, Research, and Evaluation recently awarded Mathematica a project named Investigating Strategies to Improve Head Start Educator Compensation, which will be a future source of information about how programs can support better compensation models and practices.

Increased wage requirements necessitate accompanying funds for AI/AN Head Start programs. The Notice of Proposed Rulemaking's goals of improved recruitment approaches and increased retention rates of Head Start staff will be beneficial to AI/AN Head Start programs if supportive funds to implement the proposed changes accompany the goals. Implementing the

proposed staff wage and operational cost increases could lead many AI/AN Head Start programs to reduce enrollment and staff sizes or even close their programs without support for implementation. OHS has acknowledged this concern by offering a waiver for small agencies, but these imposed barriers would still affect an estimated 22 percent of AI/AN Head Start agencies. Without offering supportive funding, the increased wage requirements could undercut the work of many AI/AN Head Start programs.

Further flexibility to braid federal early childhood funds together is critical to make continued progress in recruitment and retention. Misalignment between eligibility criteria for both participants and providers in federally funded early childhood programs, including Head Start and CCDF, increases administrative cost and workload burdens. Aligned and more flexible eligibility requirements would enable programs to support Indigenous children and families in their communities most effectively and uphold Tribal self-determination.

G.2. Teacher Qualifications

AI/AN Head Start teacher qualification requirements must reflect the unique circumstances of the community and recognize the sovereignty of Tribal Nations to shape their own provider eligibility requirements. Flexibility in teacher qualification requirements would offer an opportunity for programs to recruit vital community members, including Elders and Native language speakers, to provide culturally congruent education and wisdom to Indigenous children in their communities.

Head Start teacher eligibility requirements might not fully consider the unique circumstances of AI/AN programs, leading to challenges in meeting specific workforce qualifications. Requirements that do not account for cultural competencies or recognize untraditional education pathways hinder education, training, recruitment, and retention efforts, and ACF should revise or remove them. An effective workforce in Tribal communities must understand and respect cultural traditions, languages, and values. Qualifications should include training on cultural sensitivity and engagement with Tribal communities.

Elders and community members serve as role models and culture bearers within Tribal communities. Elders are the backbone of language preservation and transmission, cultural connection, and cultural continuity. Elders possess invaluable cultural knowledge and traditional teachings that are vital for the holistic development of children within their communities. However, stringent educational qualifications often exclude the Elders from formal roles in early childhood education, overlooking their unique expertise, wisdom, and cultural contributions. Elders and community members might not have formal academic credentials or meet traditional workforce qualification standards. This excludes them from formal employment opportunities within early childhood education programs, including Head Start, further limiting the programs' quality and cultural responsiveness.

Flexibility in teacher qualifications respects and recognizes Tribal sovereignty and self-determination. The Tribal Colleges and Universities Head Start Partnership Program is a supportive program under the current rule. However, providing Tribal Nations greater authority to determine their own eligibility criteria can empower them to design programs that best serve their communities. Tribal Nations should be able to determine how to best strengthen their early childhood programs, including Head Start.

H.   Training and Technical Assistance

TTA for AI/AN Head Start programs must be culturally responsive and tailored to the specific needs of Tribal communities. Although the responses in other sections offer TTA recommendations, these recommendations offer broad strategies that support wise practices[2] for Tribal communities and flexibilities that support funding use, capacity-building, and sustainability.

Peer learning to support wise practices for Tribal programs. OHS should expand TTA offerings to include more peer learning opportunities and examples of successful strategies used by other AI/AN Head Start programs. This would enable programs to learn from one another and apply best practices in areas such as curriculum development, family engagement, and staff retention. These opportunities should highlight innovative approaches to incorporating Indigenous pedagogy and cultural traditions, language immersion, and holistic child development models into Head Start programming.

Flexibility in TTA funding use. Programs should have more flexibility to use TTA funds for culturally specific training, such as language immersion or traditional cultural practices. OHS should provide clearer guidance on how to use these funds to address the unique challenges faced by Tribal programs, including staff recruitment, curriculum development, and community engagement.

Capacity-building support. In addition to specific training resources, OHS should offer more capacity-building TTA that focuses on long-term program sustainability. This could include guidance on leadership development, financial management, and strategic planning to help AI/AN Head Start programs strengthen their organizational foundations and expand their impact.

I.   Supporting Partnerships with State Systems

AI/AN Head Start programs operate within state systems that often have policies and structures that do not align with the cultural or governance practices of Tribal communities. Several suggestions follow for how OHS can better support partnerships between Tribal programs and state systems.

Aligning state and Tribal systems. Many AI/AN Head Start programs struggle to align their services with state systems, particularly when it comes to integrating early childhood education with state-funded programs like public pre-K. OHS should facilitate more coordination between state systems and Tribal programs, ensuring that state policies do not create unnecessary barriers for Tribal programs. This could include developing collaborative agreements between states and Tribal governments that respect Tribal sovereignty while promoting shared goals for child development.

Supporting children with disabilities. One area in need of better coordination is in the provision of services for children with disabilities. OHS should work with local education agencies and other state-level partners to ensure that Tribal children with disabilities receive the support they need. This could include offering more TTA on how to build partnerships with state systems for providing services such as speech therapy, occupational therapy, and individualized education plans.

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[2] Wise practices recognizes "the wisdom in each Indigenous community and in the community's own stories of achieving success" (see here).

Information sharing and collaboration. OHS should improve information-sharing systems between Tribal programs, state systems, and the National AI/AN Head Start Collaboration Office. Creating more opportunities for collaboration and communication across these systems will help programs better coordinate services and align their efforts to support young children and families.

J. Facilities

The condition of facilities is a major concern for many AI/AN Head Start programs, especially those located in rural or remote areas where infrastructure is limited. Several recommendations follow for improving facility standards and ensuring that AI/AN programs have the resources they need to maintain safe and culturally relevant learning environments.

Flexible facility standards. AI/AN programs often face unique challenges in maintaining or constructing facilities that meet federal standards, particularly in remote areas. OHS should offer greater flexibility in facility requirements, enabling programs to prioritize culturally relevant design elements and outdoor learning spaces. Programs should also have more leeway in how they allocate their budgets to address facility needs, including minor renovations or expansions to accommodate community events and cultural activities.

Addressing environmental hazards. Environmental hazards such as lead in water and paint have disproportionately affected many AI/AN communities. OHS should provide more funding and guidance for identifying and addressing these hazards in Head Start facilities. Partnering with the Indian Health Service to expand regular safety assessments could help ensure that facilities are safe and environmentally sound.

TTA for facility management. Managing and maintaining facilities can be a significant burden for many Tribal programs, especially those with limited staff or budget. OHS should offer more TTA on facility management, including how to apply for federal or state funds for renovations, conduct environmental testing, and design spaces that reflect community values and traditions. Sharing best practices from other AI/AN Head Start programs that have successfully improved their facilities could also be beneficial.

K. Fiscal Operations and Management

Fiscal management and oversight are critical for ensuring the long-term sustainability of AI/AN Head Start programs, but many programs face challenges in meeting federal financial requirements. Suggestions for how OHS can improve support for fiscal operations in Tribal programs follow.

Flexibility in administrative cost limits. The 15 percent administrative cost limit for a program's total development and administrative costs can be difficult for many AI/AN Head Start programs to meet, especially those that operate in rural or remote areas where costs are higher. OHS should offer more flexibility in how it calculates administrative costs or allow for automatic waivers for small or rural programs that demonstrate financial need.

Support for non-federal match requirements. Programs must contribute 20 percent of their cost; this nonfederal match requirement is a significant barrier for many Tribal programs, particularly those in economically disadvantaged areas. OHS should streamline the waiver process for programs that struggle to meet this requirement and offer more guidance on how to seek alternative funding sources or in-kind contributions to meet the match.

TTA on fiscal management. Many AI/AN Head Start programs would benefit from more targeted TTA on fiscal management, particularly in areas such as budget planning, grant writing, and financial reporting. OHS should expand its TTA offerings to include resources specifically tailored to the needs of Tribal programs, helping them build stronger financial foundations and ensure compliance with federal requirements.

L. Early Childhood Systems

Tribal child care programs benefit from collaboration and partnership with other organizations to expand supports for child and family wellbeing.

Policies that support braiding different streams of funding. Tribal communities have long recognized the importance of aligning services with cultural values and community priorities to effectively support families. One way they achieve this is by braiding various funding streams into a cohesive suite of culturally resonant services. This braided approach enables Tribal Nations to create a seamless support system that addresses the economic, emotional, and social well-being of families. It also allows for the development of programs that are responsive to the unique challenges faced by Tribal communities, such as geographic isolation or historical trauma, while emphasizing strengths such as kinship networks and community cohesion.

TTA that support systems-building and business development. Identifying and cultivating partnerships with other organizations requires program staff to have an entrepreneurial mindset. TTA could support program staff in addressing the availability and appropriateness of external partners. In addition to navigating the regulations and policies of other organizations, programs also need to understand if other organization are a good cultural match. For instance, do other local organizations have the necessary cultural humility to respectfully partner with a Tribal program?

M. Other Topics

Mathematica would like to affirm OHS's statements regarding its commitment to active engagement and collaboration with Tribal Nations in designing and refining Tribal regulations and policies. Through mechanisms such as Tribal consultations and listening sessions or other participatory engagement strategies, Indigenous voices need to be at the forefront of these decisions in ways that elevate their sovereignty and self-determination.

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