



CALIFORNIA RURAL INDIAN HEALTH BOARD, INC.

The following are points that concern California Rural Indian Health, Inc. as a Head Start Grantee. Tribes across the country are facing similar concerns.

Cultural Teacher Qualifications

Imperative to the survival of Tribal languages and culture is engaging traditional speakers and cultural transmitters within HS/EHS programs as teachers and teacher assistants. The current regulations for meeting the qualification requirements for education coordinators, teachers and teacher assistants will produce burdensome challenges for Tribal programs. For example, many of the language speakers are elders and are not interested and are unlikely to seek a degree for meeting the teacher/teacher aid qualifications. Many Tribes do not have the resources to employ a third person in the classroom as a language and/or culture teacher.

Tribes should determine the proficiency of staff or Tribal members to work with infants/toddlers and preschoolers.

1. The initial work with young children is critical in the teaching of belonging. Entry level teachers in Tribal communities who are the carriers of the community and family culture should be waived from the requirements of possessing an infant/toddler CDA &/or ECE AA at date of hire. Tribes need to nurture their own members and community members to be teachers of their children.
2. Programs are concerned about how to utilize their Tribal language speakers in full immersion classrooms given the requirements for certified or credentialed teachers.

Suggested OHS Action:

3. Since the teacher qualification requirements are a nationwide target, OHS should consider waiving the teacher qualifications for teaching staff so that Tribes can employ qualified (as determined by Tribes), and sometimes certified, language speakers and/or cultural transmitters in their Head Start and Early Head Start programs.
4. If Tribes and states have established a program for certifying American Indian and Alaska Native speakers as qualified teachers, OHS should accept such individuals as meeting the teacher qualification requirements (Arizona, California, Oregon and Washington).

CLASS and Designation Renewal System

The Head Start Act of 2007 does not specifically require the use of the CLASS (Classroom Assessment Scoring System). *Sec 641A (c) (2)(F) include as part of the reviews, a valid and reliable research-based observational instrument, implemented by qualified individuals with demonstrated reliability, that assesses classroom quality, including assessing multiple dimensions of teacher-child interactions that are linked to positive child development and later achievement.* AIAN Tribal grantees are concerned

and hold issue with the use of CLASS generally, and more specifically, as a measurement for determining if a grantee goes into the Designation Renewal process.

We are concerned that “principles of scientific research” for supporting the assessment approach have not been tested with American Indian and Alaska Native populations, and therefore the reliability and validity relative to education activities and teacher performance is highly suspect. We have grave concerns regarding the cultural appropriateness and reliability to the AIAN zero to five populations. Teachstone, the developers of CLASS, cannot provide research data on Native American Alaskan Native children to show cultural and behavioral norms or differences. There are “white-paper” references on the importance of cultural competency and respect, but no real information on how it impacts Tribal teachers or children.

Of particular concern is the reliability of CLASS reviewers in observing child and teacher interaction and instructional support in native communities. Currently there is inadequate training for reliable CLASS reviewers to consider cultural differences during the review process, and the system does not allow time for the program to make reviewers aware of cultural differences they may observe.

CLASS continues to be problematic for AIAN grantees as a trigger for DRS. Programs who are otherwise in FULL compliance, find themselves in DRS because of the lowest 10% trigger which is determined after the monitoring year has been completed even if they met the minimum threshold score. Programs must wait to see where they stand for several months, making this an impractical use of the tool and a waste of a year in seeking professional development for teachers who may benefit from focused and intentional strategies to improve their efforts.

The initial need to utilize a system to identify the bottom 10% is no longer present. As each monitoring season goes by, the CLASS scores continue to rise, resulting in unrealistic levels of competency. Programs who are scoring in the bottom 10% are now scoring at or above the OHS thresholds and CLASS standards.

We strongly recommended the removal of the lowest 10% provision, maintaining current minimum thresholds, and increasing the cultural and linguistic awareness and competency of CLASS observers.

Suggested OHS Action:

5. Eliminate the arbitrary 10% criteria of the CLASS evaluation system and its tie to the OHS self-imposed 25% goal in 1304.11 of the Head Start Performance Standards.
6. Low CLASS threshold scores should be treated as non-compliance rather than a deficiency. OHS should then implement a follow-up review of CLASS.
7. Identify and use proficient reviewers that demonstrate knowledge, expertise and experience in working with AIAN populations and have demonstrated abilities to work with diverse cultural and ethnic populations.
8. Provide additional resources and supports for bringing the AIAN grantees up-to-speed on implementing and using CLASS. Additional funds to support the purchasing of CLASS materials, attending training programs, and added additional funding to the CLASS contract

for the logistics and facilitation of training events.

9. Establish a formal grievance process for challenging CLASS evaluations not conducted appropriately.
10. Exempt AIAN grantees from CLASS until it has been tested and shown to be valid and reliable in AIAN populations.

AIAN Specific Research:

The Department of Health and Human Services, Administration of Children and Families and the Office of Head Start have demonstrated over a good number of years (20-30) that it was remiss in meeting the administrative requirements stipulated in numerous (7) Head Start Acts as Amended relating to the research/development for AIAN specific research. The U.S. Congress's intent in placing Indian specific research requirements in the Acts was to assist DHHS and its agencies in making informed decisions regarding the targeted Indian population, funding formulas, condition and lack of appropriate facilities, effects of rural and remote service delivery areas, learning and development styles of young diverse Indian children, effects of services, etc. There has been limited or no production on the research items as required by the 2007 Act let alone previous Head Start Acts.

Suggested OHS Action:

11. A research status report be developed by OHS and distributed widely to Tribal grantees, Tribally Controlled Colleges/Institutions, National Indian Head Start Directors Association and the National Indian Collaboration Office.
12. Sufficient research dollars be allocated by OHS for actualizing its required charge to conduct specific research affecting Tribal Grantees prior to other areas in the Act or OHS internal priorities. For example:
 - **Funding allocations** and distribution formulas, including cost of providing services with the rural, isolated and remote locations of American Indian and Alaska Native populations
 - Determine the **eligible Indian population** throughout the United States including populations served by current Indian Head Start Agencies including the need for services
 - **Identification of culturally appropriate and relevant curricula, assessment,** and screening tools and provide guidance on selecting curricula based upon price, adaptability and their research grounding
 - **Overall study of Indian Head Start, Sec. 649(k).** The Act requires a study or studies, undertaken in collaboration with Tribes, the collaboration director and the National Indian Head Start Directors Association, addressing a wide range of issues.
 - **Delivery Study. Sec. 650(a)(14).** The Act also requires a study of the delivery of Head Start programs to Indian children living on and near Indian reservations and to children of Alaska Natives.

Federal Monitoring:

There needs to be a continued effort to assure cultural competence for federal reviews and monitoring activities. Since the inception of the Federal On-Site Review Process, Tribal grantees have consistently voiced concerns over the lack of knowledgeable and skilled federal on-site teams, the lack of professionalism of team leaders and reviewers, and the lack of cultural sensitivity of teams. Many reviewers lack an understanding of Tribal governments and the unique relationship they have with the federal government, let alone have the expertise inclusive of cultural awareness and

responsiveness of diverse cultures. More effort should be made to recruit culturally competent reviewers from the Native community.

Suggested OHS Action:

13. Ensure the federal monitoring contractor provides cultural competence training regarding the uniqueness of Tribal governments and cultures
14. Increase recruitment from the Native community.

Staff Qualifications - Professional Development:

Indian Head Start programs have great difficulty in recruiting and retaining teachers and teacher aides.

Difficulty in recruiting qualified applicants with an existing CDA, AA or BA in Early Childhood Education.

- **CDA Challenges:** Potential employees are not aware of the CDA credential prior to seeking employment with Head Start. To expect that programs can recruit and hire someone with an existing CDA is not possible. It is very rare that a job applicant already has a CDA. It is only after the program hires the employee that the CDA process can begin. Finding mentors and other support staff that are easily accessible to Tribal communities as part of the CDA process is a difficult task for many programs.
 - **AA/BA Challenges:** On many of the Tribal lands there are not institutions of Higher Learning where potential employees can obtain an A.A or B.A. in Early Childhood Education. Many reservations are located in extreme rural areas making distance learning institutions inaccessible for rurally located Tribal communities.
15. **Teachers earn required degrees and then are able to take higher paying positions.** Head Start employees who obtain a degree are able to seek employment with the local school system or other early childhood programs for a higher paying wage. Due to inadequate funding levels, Tribal Head Start Programs are unable to compete with the wages that other schools and ECE programs can offer to employees. They are able to earn a higher wage with fewer requirements creating perpetual vacancies within the Head Start program.
 16. **Funding to maintain qualified teaching staff.** The Head Start Act continues to increase the educational requirements for teaching staff but does not provide adequate funding levels to Tribal programs that would allow programs to increase current wages to be competitive and to improve starting wages/wage scales of the program. Provide funding for programs to create Step-Increase Levels to pay competitively for staff that has both a degree and years of experience.
 17. **Minimum wage increases.** Many cities and states have voted to raise their minimum wage with increases over the next few years. This coupled with increasing healthcare costs will force programs to adjust their entire pay scales to avoid wage compression (when the lowest paid workers, such as substitute teachers, edge closer to the higher paid employees with degrees or even managers). Without increased funding or an option to renegotiate a program's cost per child, many programs will face reducing already overburdened staff and/or compromising program elements – or worst case, shutting down.

Suggested OHS Action:

18. Grant waivers for staff that do not meet the degree requirements until funding levels can be increased to allow for competitive pay of qualified staff.
19. Allow programs to renegotiate their cost per child to allow for the proper compensation and retention of qualified staff.

Indian Head Start Facilities:

Tribal Head Start grantees have reported the need for facility improvements that include both major and minor renovations as well as the need for new construction. Often there is a lack of alternate facilities in rural and remote areas, forcing grantees to spend significant portions of their budget to maintain environmentally safe facilities. Tribes, especially those located in remote, isolated areas are unable to afford costs associated with the upkeep for structures used for Head Start purposes. In FY2015 the Office of Head Start submitted their Report to Congress on American Indian Alaska Native Head Start Facilities. In it OHS reported that:

20. 36% of facilities had documented concerns including worn interiors, cracked ceilings, poor insulation and overall deterioration due to the impact of adverse weather conditions.
21. 37% of facilities had concerns related to building materials and conditions, such as mold, leaks, flooding, and gas or sewage odors.
22. 15% of centers have HVAC systems that are improperly ventilated and experience difficulty in regulating temperature. Some centers attempt to augment systems with window AC units and space heaters, which add energy costs and can pose fire safety risks.
23. 14% of the restrooms are not age-appropriate (sized for adults, not children), or the ratio of restrooms to children is too low.

Twenty-five percent of the centers assessed will be 40 years of age by 2020. Investing in short term maintenance and repairs rather than renovations or new construction designed for the long-term lends itself to inefficient spending. Centers that are rapidly deteriorating due to old age, and/or have a major structural issue are likely contributing to other patterns such as under-enrollment, a higher cost per child, and issues AIAN programs encounter when expanding services and partnering with child care providers. The cost to renovate or perform outstanding maintenance and repair of the 506 centers nationwide is estimated to be \$69.64 million.

Suggested OHS Action:

24. Create opportunities for grantees to apply for funding for renovation or construction of facilities.
25. Inform grantees of other funding sources for facility improvements or construction such as private foundations or other federal or state programs.
26. Provide a separate space for facility topics regarding construction and renovation requirements, resources including how to prepare an application for facilities funding, training and funding opportunities on the ECLKC

Office of Head Start Training Materials

Materials often created by the National Centers do not take into consideration the different requirements for Native Head Start programs. The materials are often revised as an afterthought. This can result in confusion and misinformation to programs, especially those new or struggling directors who rely on these materials to support their programs.

Suggested OHS Action:

27. To address this issue, we propose that the National Centers employee staff who have knowledge and experience with Tribal programs to develop appropriate materials for Native Head Start programs. At best, create a workgroup of Tribal Head Start Directors to give input into the design of training materials.

Additional Ask:

- Before we leave, we did want to ask for your help in making sure our Head Start programs have the resources we need to run most efficiently.
- We ask that you prioritize funding the Quality Improvement Fund (QIF). Per the 2007 Head Start Act, this will allow the necessary flexibility for our programs to address our greatest needs.
 - Increased duration of services, to support working families
 - Enhanced staff training – specifically Trauma Informed Care
 - Community wide planning
 - Improved classroom environments – Facilities funds
 - Doubling hours for Mental Health Consultants
 - Changing statute to allow for families in the 180-200 above poverty to access Head Start – helps with under enrollment issues
 - Allow for Head Start teachers with higher education to tap into a Loan Forgiveness Act
 - Parent Engagement – increase funds to help parents become licensed providers
 - Strengthened transportation safety

REVIEW OF HEAD START ISSUES AND CONCERNS

1. Cultural Teacher Qualification
2. CLASS and Designation Renewal System
3. Federal Monitoring

4. Staff Qualifications - Professional Development
5. Indian Head Start Facilities
6. Office of Head Start Training Materials