

Fort Belknap Indian Community



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Fort Belknap Indian Community
(Tribal Govt.)
Fort Belknap Indian Community
(Elected to administer the affairs of the community and
to represent the Assiniboiné and the Gros Ventre Tribes
of the Fort Belknap Indian Reservation)

OFFICIAL PUBLIC COMMENT RECORD
FORT BELKNAP INDIAN COMMUNITY
Aaniiih and Nakoda Nations
Fort Belknap Agency, MT

September 15, 2026

Submitted via Regulations.gov (Docket ACF-2026-0595)

And via Email: AIANHeadStart@acf.hhs.gov

The Honorable Khari M. Garvin
Director, Office of Head Start
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street SW, 4th Floor
Washington, DC 20201

**RE: Fort Belknap Indian Community Official Comments and Opposition to NPRM:
"Reducing Federal Burden for Head Start Programs" (Docket No. ACF-2026-0595)**

Dear Director Garvin,

On behalf of the Fort Belknap Indian Community (FBIC), representing the Aaniiih (Gros Ventre) and Nakoda (Assiniboiné) Nations of the Fort Belknap Reservation in Montana, we write to submit our formal comments and express our strong opposition to specific provisions within the Notice of Proposed Rulemaking (NPRM) titled "Reducing Federal Burden for Head Start Programs."

While the Fort Belknap Indian Community appreciates federal efforts to streamline administrative requirements, the proposed rules fail to address the actual operational burdens faced by Tribal programs. Instead, they introduce structural changes that threaten the viability of our local Head Start operations.

We strongly oppose any funding caps and any framework that permits or causes an annual reduction of federal funds to our Head Start Program operations. Our formal opposition is grounded in the following critical issues:

1. Absolute Opposition to Administrative Funding Caps and Annual Reductions

The proposed reduction of the administrative cost cap from 15% to 5% creates an unsustainable operational environment for our Tribe. In a geographically isolated community like Fort Belknap, administrative structures must absorb the high costs of compliance, reporting, and specialized oversight. Capping these costs at 5% or allowing annual funding reductions undermines our sovereign ability to administer these programs effectively. We demand a complete exemption for American Indian and Alaska Native (AI/AN) programs from these restrictive caps and funding reductions.

2. True Administrative Burdens: Chronic Underfunding and Complex Mandates

The true burdens impacting our Head Start program do not stem from the comprehensive nature of the Head Start Program Performance Standards (HSPPS), but rather from persistent, chronic federal underfunding coupled with overly complex, rigid federal reporting mandates. True burden reduction requires flexible, non-competitive operational funding and a simplification of federal compliance workflows—not the dismantling of structural health, safety, and comprehensive family support standards.

3. Severe Staffing Hurdles and Geographic Isolation

The Fort Belknap Reservation faces severe staffing hurdles exacerbated by our extreme geographic isolation. Attracting, qualifying, and retaining certified early childhood educators, language instructors, and specialized support staff within a rural reservation economy requires competitive wages and robust local resource allocation. Any reduction in federal funding or administrative flexibility directly harms our capacity to recruit qualified staff, leaving our children underserved.

4. Preservation of Native Languages Amidst Operational Obstacles

The preservation and revitalization of our Native languages—Aaniiih and Nakoda—is an exercise of our inherent tribal sovereignty and vital to the developmental success of our children. While we acknowledge that the NPRM includes language text intended to permit heritage language preservation, our staff must constantly work to preserve our languages despite severe operational obstacles and underfunded infrastructure. True language preservation cannot survive under a regime of annual budget constraints and administrative resource stripping.

5. Saving money should not be a child's responsibility

Head Start has been providing vital, comprehensive services to preschoolers since 1965 – why would we ever push that aside just to cut corners? Our children learn best when their fundamental needs are met. They excel when they are fed a nutritious meal and when they are not distracted by the pain of an untreated toothache. They thrive when they can clearly see their surroundings, hear what their teacher is saying, trust the adults in their lives, and feel unconditionally accepted. Over six decades, Head Start has ensured our most vulnerable children don't just survive, but truly thrive. Stripping away these regulations to save a dollar compromises the health, safety and future of our children. We cannot allow budget cuts to be made at the expense of a child's well-being.

6. Head Start provides comprehensive services that allows a child's disability to be found early

The HHS Notice of Proposed Rulemaking could weaken mandatory developmental screenings and disability supports for children. Services for children's disability can begin early, which makes learning easier throughout the following years. The children and parents, birth to five years old enrolled in our program would like to be seen as an individual having physical, intellectual, social, emotional and spiritual needs. We accept that any money saved from the deregulation be put back into our program so that all of the children waiting to be served will enter our program and be served. Look at our needs in a holistic manner.

Conclusion and Demand for Meaningful Tribal Consultation

The Fort Belknap Indian Community urges the Administration for Children and Families to withdraw the proposed administrative funding caps and guarantee that federal allocations to AI/AN Head Start programs will not face annual reductions. We request that the Office of Head Start utilize the upcoming virtual Tribal Consultation on September 16, 2026, to directly address how these proposed rules disproportionately harm geographically isolated land-based tribes.

Thank you for your consideration of these urgent concerns. Feel free to contact my office at randall.werk@ftbelknap.org or Julia Doney, Fort Belknap Head Start Director at Julia.doney@ftbelknap.org for questions or further information.

Sincerely,



Randall Werk, Sr., President
Fort Belknap Indian Community

OHS Virtual Tribal Consultation – September 16, 2026

This testimony was provided during an Office of Head Start (OHS) Tribal Consultation held on September 16, 2026, and is being submitted by OHS on behalf of the Tribal Leader or authorized designee who provided the testimony. Because this submission is based on a raw transcript of the virtual consultation, the transcript may not fully or accurately capture the speaker's words, meaning, tone, or intended sentiment as expressed during the oral testimony.

Kameron Runnels, Vice Chairman, Santee Sioux Nation, Nebraska2:34:27

OK.

My name is Kameron Runnels.

I'm the vice chairman, the Santee Sioux nation. I'm here with the tribal Council and the head start director here.

I'd be.

I'd be repeating many of what was already said, so I'll try to put away the written and prepared comments and speak a little bit more freely with my own words.

We keep hearing about tribal flexibility.

Yeah. And I think that flexibility for tribal head start.

Means making it easier for our kids and our programs to learn and operate.

And and this flexibility should be left alone and and allow us to to run our own programs.

You know, obviously there there's probably some federal requirements to to follow, but having flexibility for tribes, that's that's easier and not difficult.

Yeah, we should be able to use our own culture, our own language, our traditions, in our classroom, you know this.

This isn't the the boarding school era anymore.

You know, we are sovereign treaty tribes and the federal government has responsibilities to uphold with us and communicate with us, you know, and and perhaps we we need more consultation so we can address these concerns.

Whenever they come up.

In a properly or in a timely.

Any manner and should also be advocating for for more funding to our programs so we can have adequate facilities. So our children don't spend most of their day in aging and

overcrowded classrooms.

And we welcome office of Head Start to come to Santee, Nebraska and see first hand what our teachers and our kids work with every day.

And they do great things with what they have.

But please make it easier for us.

I heard a comment earlier and they said that they were thankful for the office of Head Start and I would say that we would like to be thankful for the office of Head Start, but we're still waiting on a head start is gonna help us with a new.

School building.

Here our small children spend most of their day.

In small old classrooms that are 60 years old.

Where our community are already deals with no clean water and now the office of Head Start wants to make make it more difficult for us with all this stuff.

So I would just say, please listen to us and what everyone has said today and and make

it easier and flexible for us. And and I would again say you're welcome anytime to come to the San Tissue Nation and meet with us and. See our office, our Head Start office and our classrooms. Thank you.

APIA Written Tribal Consultation Regarding

Office of Head Start Notice of Proposed Rulemaking

Titled *Reducing Federal Burden for Head Start Programs*

Wednesday September 16, 2026, 1:00 – 4:00pm ET (9:00-12:00 AKST)

Virtual

Written testimony to be submitted to AIANHeadStart@acf.hhs.gov, no later than October 6, 2026.

Opening

The Aleutian Pribilof Islands Association (APIA) appreciates the opportunity to provide comments regarding the Office of Head Start's (OHS) Notice of Proposed Rulemaking (NPRM) titled *Reducing Federal Burden for Head Start Programs*. APIA operates four Head Start classrooms across three sites serving communities in the Aleutian and Pribilof Islands and Alaska Peninsula, some of the most rural and geographically isolated communities in the nation.

APIA's Head Start program serves children and families in an environment characterized by significant transportation challenges, high operating costs, workforce shortages, and limited access to health, behavioral health, and other support services. These realities often differ substantially from those experienced by larger urban programs and should be considered when evaluating the impacts of proposed regulatory changes.

APIA supports efforts to reduce unnecessary administrative burden and improve program flexibility. At the same time, changes intended to reduce federal requirements should be carefully evaluated to ensure they do not inadvertently increase costs, create operational challenges, or reduce Tribal flexibility in ways that negatively affect services to children and families. Tribal Head Start programs require sufficient flexibility to address local needs while continuing to provide high-quality early childhood services rooted in the cultures and values of the communities they serve.

Tribal Consultation Process

APIA appreciates the opportunity to provide input regarding the proposed rule. Meaningful Tribal consultation is particularly important when proposed regulatory changes may substantially affect Tribal Head Start programs, Tribal sovereignty, and services provided to Native children and families.

APIA is concerned that the scope and complexity of this NPRM make it difficult for Tribal programs to fully evaluate potential impacts within the allotted comment period. The NPRM proposes numerous changes across multiple areas of program operations, each of which may carry distinct implications for Tribal Head Start grantees. Evaluating these impacts requires consultation with program leadership, governing bodies, Policy Councils, and community stakeholders, as well as careful assessment of operational, fiscal, and service delivery consequences.

For Tribal organizations operating in remote Alaska, these reviews are further complicated by limited administrative capacity, multiple concurrent federal consultation periods that compete for

administrative time, and governance structures that may not align with federal rulemaking timelines. As a result, the standard comment period may not provide sufficient opportunity for meaningful Tribal review and feedback on complex regulatory proposals.

APIA encourages OHS to develop and release a Tribal Impact Analysis for this NPRM and to adopt a similar practice for future rulemaking proposals affecting Tribal Head Start programs. Such a document could identify provisions that may uniquely affect Tribal grantees, highlight potential operational and funding implications, and assist Tribal leaders in providing informed feedback during the consultation process.

Meaningful consultation requires not only an opportunity to comment, but adequate time and information to fully understand how proposed changes affecting Tribal communities and the children and families they serve. Therefore, APIA recommends an extended comment period of 120 days releasing a Tribal Impact Analysis to support meaningful Tribal review and consultation.

[Deregulation and Reducing Administrative Burden](#)

APIA supports efforts to reduce unnecessary administrative burden and eliminate requirements that do not meaningfully improve services for children and families. Tribal programs benefit when reporting requirements are streamlined, duplicative processes are eliminated, and staff time can be redirected from administrative tasks to direct services.

At the same time, APIA is concerned that many provisions proposed for deletion appear to be substantive program standards rather than administrative requirements. While reducing paperwork and bureaucracy is a worthwhile objective, many of the provisions identified for removal help define the Head Start program, establish expectations for quality and comprehensive services, and provide a consistent framework for program operations. Burden reduction efforts should focus on eliminating unnecessary administrative requirements rather than removing the core elements that distinguish Head Start from other early childhood programs.

APIA encourages OHS to carefully distinguish between requirements that create administrative burden and requirements that establish essential program standards. Regulatory reform should streamline processes and reduce duplication while preserving the components of Head Start that support program quality, accountability, Tribal flexibility, and positive outcomes for children and families.

[Notice of Proposed Rulemaking](#)

APIA remains concerned about several proposed changes to Head Start requirements that could have disproportionate impacts on Tribal and rural programs. While ACF has identified these proposals as opportunities to reduce regulatory burden, many of the proposed changes would instead shift new burdens and risks onto programs operating in remote communities.

APIA's Head Start program serves communities across the Aleutian and Pribilof Islands and Alaska Peninsula, where geographic isolation, transportation challenges, staffing shortages, and limited access to services create operational realities that differ significantly from those of larger urban programs. Policies that may appear reasonable when applied to large population centers can have unintended consequences in remote Tribal communities.

[Administrative Cost Limitations](#)

APIA is particularly concerned about the proposed limitation on administrative costs. Tribal Head Start programs operating in remote communities face fixed costs and administrative responsibilities that do not decrease proportionally with enrollment. For example, the cost of operating a facility in rural Alaska, including utilities, insurance, and other overhead expenses, remains largely unchanged regardless of whether a program serves 40 children or 400 children. Similarly, core administrative functions such as fiscal management, grant administration, procurement, human resources, reporting, monitoring preparation, and compliance activities remain necessary regardless of program size.

For programs operating in geographically isolated communities, administrative costs are further influenced by transportation challenges, higher operating expenses, limited staffing pools, and the need for employees to perform multiple functions. Unlike larger grantees that may benefit from economies of scale, small Tribal programs often cannot spread administrative costs across large enrollment numbers. In many remote communities, a minimum level of administrative infrastructure is required simply to maintain program operations and compliance with federal requirements.

APIA is concerned that a five percent administrative cost limitation does not reflect the operational realities of Tribal Head Start grantees and could force programs to make difficult decisions regarding staffing, compliance, and program administration. While the proposed limitation may be achievable for large state grantees with substantial enrollment and administrative economies of scale, it is unrealistic for smaller Tribal programs serving geographically isolated communities.

APIA requests that OHS maintain flexibility for Tribal recipients up to the maximum administrative cost limitation permitted by statute. Ideally, OHS would allow Tribal Head Start grantees the option to utilize their federally negotiated indirect cost rate, which more accurately reflects the actual costs of administering programs in remote and high-cost operating environments.

[Protecting Tribal Authority and Self-Determination](#)

APIA is concerned that several provisions of the NPRM rely on state licensing and regulatory systems as substitutes for existing Head Start Performance Standards. While this approach may be workable in some areas of the country, it does not fully reflect the realities faced by many Tribal programs, particularly those serving remote Alaska communities where state licensing systems may be difficult to access or may not be available in the same manner as they are in larger population centers.

Tribal governments and Tribal organizations play an essential role in establishing standards, protecting the health and safety of children, and ensuring services are delivered in a manner that reflects local culture, community needs, and Tribal priorities. As OHS considers changes to existing requirements, APIA encourages the agency to recognize Tribal licensing, Tribal approval systems, and other Tribal regulatory mechanisms as equivalent to state and local systems where appropriate.

APIA is also concerned that, in some circumstances, the proposed rule could remove existing federal standards without providing a clear alternative for programs operating outside traditional state licensing frameworks. For remote and underserved communities, this could create uncertainty regarding program expectations and reduce important protections that families have come to expect from Head Start programs. APIA recommends that OHS explicitly recognize Tribal licensing and Tribal approval systems throughout the final rule wherever state or local requirements are referenced. In addition, where no applicable state, local, or Tribal standard exists, OHS should maintain a federal baseline that preserves essential health, safety, and program quality expectations while continuing to respect Tribal self-determination and local flexibility.

[Protecting Native Language and Culture](#)

APIA is concerned that proposed changes related to language instruction could have unintended consequences for Tribal Head Start programs and the Alaska Native children they serve. Head Start plays an important role not only in preparing children for school, but also in supporting cultural identity, strengthening connections to community, and preserving Native languages for future generations.

Many Alaska Native languages are endangered, and opportunities for young children to hear and use their Native language may be limited outside the classroom. For some families, Head Start provides one of the few structured environments where Native language and culture can be incorporated into daily learning activities. Efforts to increase English language proficiency should not come at the expense of Native language instruction, cultural education, or Tribal language revitalization efforts.

APIA supports approaches that promote English language development while continuing to recognize the value of Native languages and culturally grounded education. Tribal programs should retain the flexibility to incorporate Native language instruction, traditional knowledge, and culturally relevant learning experiences in ways that reflect local priorities and community needs.

APIA encourages OHS to ensure that Tribal Head Start programs retain broad authority to use and promote Native languages throughout program operations and classroom activities. Any exemptions or protections related to Native language instruction should be clear, durable, and supportive of Tribal efforts to preserve language and culture for future generations.

[Access to Mental Health Services](#)

APIA is concerned about proposed changes that would reduce or eliminate requirements related to mental health and comprehensive services. While these requirements may be viewed as administrative or programmatic burdens, they serve an important role in ensuring that children and families have access to critical supports that may not otherwise be available in rural and remote communities.

Many communities served by APIA face significant behavioral health workforce shortages, limited access to mental health providers, and long wait times for services. In some communities, Head Start may be one of the few programs regularly identifying developmental, behavioral, social-emotional, or family support needs and helping connect families with available resources. These services are particularly important for young children, where early identification and intervention can have long-term benefits. For many Tribal programs, the Head Start Performance Standards also provide the framework for establishing partnerships and securing resources needed to deliver services. APIA relies on these requirements when working with behavioral health providers and developing agreements to support services in the communities we serve. The standards provide a clear basis for budgeting, planning, and coordinating behavioral health support in remote communities where services may only be available through intentional partnerships and periodic provider visits. Reducing or eliminating these requirements may make it more difficult for programs to maintain those relationships and demonstrate the need for continued investment in mental health services.

APIA recognizes the importance of program flexibility and supports efforts to reduce unnecessary administrative requirements. However, reducing expectations related to mental health and comprehensive services should not result in diminished access to supports for children and families. Comprehensive services have long been a defining characteristic of the Head Start model and contribute to the program's ability to address the needs of the whole child.

APIA encourages OHS to maintain requirements that support mental health services, family well-being, and connections to community resources while identifying opportunities to streamline documentation and administrative processes. Efforts to reduce burden should focus on paperwork and compliance requirements rather than services that directly benefit children and families.

[In Summary](#)

As OHS evaluates opportunities for regulatory reform, APIA encourages the agency to recognize that reducing federal requirements does not necessarily reduce burden for Tribal programs. In many cases, existing Head Start Performance Standards provide important support, flexibility, and recognition of the unique circumstances facing Tribal communities. Any changes to Head Start requirements should carefully consider their impact on Tribal sovereignty, program quality, program accessibility, and the ability of Tribal organizations to serve children and families in remote and underserved communities. APIA supports meaningful efforts to reduce unnecessary administrative burden, but encourages OHS to preserve the core elements of Head Start that have contributed to positive outcomes for children, families, and Tribal communities.

[Closing](#)

APIA appreciates the opportunity to provide these comments regarding the Office of Head Start's Notice of Proposed Rulemaking, title "*Reducing Federal Burden for Head Start Programs*." As OHS considers the

comments and recommendations submitted through this consultation process, APIA encourages the agency to carefully evaluate how proposed changes may affect Tribal Head Start programs serving remote and underserved communities.

APIA supports efforts to reduce unnecessary administrative burden and improve program flexibility. However, burden reduction should result in meaningful simplification rather than the elimination of standards that support program quality, comprehensive services, Tribal authority, language preservation, and access to critical resources for children and families.

Throughout these comments, APIA has encouraged OHS to recognize the unique operational realities faced by Tribal Head Start programs and to carefully distinguish between unnecessary administrative requirements and the program standards that support quality services for children and families.

APIA respectfully requests that OHS extend the comment period for this NPRM to 120 days and develop a Tribal Impact Analysis to support meaningful Tribal review and consultation. APIA looks forward to continued partnership with OHS in strengthening Head Start while preserving the flexibility necessary for Tribal programs to meet local needs and improve outcomes for the children and families they serve.

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Andrea Gonzales, Councilwoman, Pascua Yaqui Tribe of Arizona2:26:06

Yes, thank you. I'm here.

[Speaking native language].

My name is Andrea Gonzalez.

I am a Council member for the Pasco Yaki tribe.

I am a product of our proud head start graduates and tandina student back in 1990.

As an adult, I also participated as a parent, a foster parent, a certified lead teacher.

Family engagement coordinator and my last capacity was as a teacher supervisor and now I serve as part of the governing body as a tribal council member.

Today I speak for the Pascoe Tribe's Chairman Council.

Our Eliusei matawapo staff.

That's her name of our school, our students and their families.

First of all, I really like to say that.

You know, I know by experience and and being having different involvement in head start, I definitely know and I can say full heartedly 1000% that head start works it.

It's really great that we're seeing.

Our students thrive and not only get the the actual.

Head start. But you know our students are getting a head start into their academic progress, but also our.

Families and communities are also getting those necessary supports, whether it's in.

In their own education as parents and in the health of their families and just building long term stability and you know a lot of opportunity for economic stability within their

families.

So.

You know, I I'd like to say that federal funding must reflect the actual cost of operating tribal head start, particularly workforce transportation and culturally specific services, not simply funded enrollment for the Pasquayaki tribe.

The greatest threat to our head start access is not the lack of need. It is the inability of accessing federal funding to keep pace with the actual cost of recruiting and retaining qualified teachers and operate in a high quality tribal program. We ask for the office of Head.

Start to ensure that American Indian, Alaska Native funding allocations and distribution formulas recognize the unique workforce, transportation, geographic and cultural costs faced by tribal programs under temporary.

Under enrollment caused by workforce shortages should not become the basis for permanently reducing the tribe's funding.

Capacity.

We'd also like to ask.

That support tribal funding methodology that gives meaningful weight to local wage markets transportation such as service area cost small program FIS cost fixed, cost native language and cultural programming and demonstrated community need.

Office of Head Start should also establish an expedited process for American Indian Alaska Native change in scope, slot conversion and funded enrollment request so that a tribe does not wait months to redirect Bacon slot funding toward teacher recruitment and retention.

We'd also like to ask to protect tribal sovereignty and culturally grounded head start programming from shifting federal policies.

To A1 size fits all requirement.

Are Pasqua aqui? Headstar is not simply an early childhood classroom.

It is part of our tribe's effort to preserve our language, our culture, identity and the connection between generations.

Federal head start policy must continue to recognize the government to government relationship and must never force tribal programs to choose between.

Federal funding and culturally appropriate services.

Changes to head start regulations should should preserve tribal authority, tribal language instruction, and the ability for tribal nations to design programs around their own communities. And it's it's relevant to Pascua Yaki.

Because our our school.

Integrates our Yaki language with school readiness and early childhood education as part of its program.

OHS should therefore make clear independent of ongoing litigation that native language preservation, tribal history, culture, or traditional knowledge and culturally

responsive education are legitimate.

The legitimate and protected component of American Indian Alaska Native head start not prohibited by by DEI.

In closing, our request is straightforward.

Give tribal nations adequate and predictable resources to serve the number of children or communities actually need.

Need us to serve and to give us the flexibility to use those resources in a manner consistent with our sovereignty.

Our culture, our language and and local circumstances that are independent for each, each tribal community.

Pasquale Yaki.

Should not lose head start capacity because we temporarily are struggling to hire enough teachers.

Nor should federal policy create uncertainty about whether teaching our children, who they are, where they come from, and the Yaki language is allowable use of head start resources.

So with that, you know we we do plan to to submit a written testimony as well.

I do wanna thank the office of Head Start and all of our partners and.

Who have provided the technical assistance.

You know, they've always been have have brought us to the table. If if there's conversation to be had.

And I've really worked with us to promote.

Our our culture, our language and and and really to be advocates for our school, our.

To do what we feel is the best for our for our own program and our own community.

So with that, you know, I'd like to thank you all for for this time.

We'll send this. Yeah, thank you.

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Daryl D. Gardipe, Chairman, Reno-Sparks Indian Colony, Nevada2:14:47

OK.

Thank you for giving me this opportunity to speak and thank you all for giving all our tribal leaders.

Their time to speak.

Good afternoon.

My name is Gerald D Gardape and I'm the tribal chairman for the Reno Sparks Indian colony.

Head start has been a program on our Reno, Sparta teamed Colony since the first head start grants were established.

We became a grantee in 2002 because of Reno sparks in the colony wanted to have a strong voice.

For our native people and provide comprehensive services to our children.

Our program serves 2 communities.

One community is in an urban setting in Reno and the other community is a more rural setting in Hungry Valley.

We are currently serving our 4th generation of Head Start Children on Reno Sparks Indian Colony.

A program small as it only serves 50 two children.

Though small, the impact can be seen in the increased graduation rates.

Higher employment.

Greater family health and well-being.

And an increase in number of children identified and receiving services early for speech and development delays.

Language revitalization is crucial for our tribe, as we have fewer native speakers to teach future generations. The revitalization begins early with our young children.

We have a culture and language program that has developed a head start.

Cultural curriculum and to work to get when our head start classrooms.

That is nearly fully immersed in the Paiute language.

Which is one of the three languages of the tribe.

Thank you for the opportunity to provide comments on the head start notice of proposed rulemaking and how it would affect our native children, families, workforce and tribal government.

While we have many concerns with the NPRM.

I will focus my comments on the three issues.

Protecting tribal authority and preventing the NPRM from allowing state jurisdiction over tribal head start.

Restoring the 15% administrative cost cap for tribal head start programs and protecting tribal language, culture and authority to adapt curriculum.

Protecting tribal authority and preventing NPRM from extending state.

Jurisdiction over tribal head start. The NPRM repeatedly removes federal standards and directs programs instead to comply with state licensing local regulations.

Our tribal Care Development Fund requirements for tribal head start that framework infringes on our sovereignty, removes a federal standard that does not give state authority over tribal government.

Our tribal head start programs.

Nothing in the Head start regulation should independently confer or expand state or local jurisdiction over a tribe or tribal organization.

In Nevada, the current tribal head start, grantees and the tribal CCDF lead agencies are completely different entities.

We support a simple hierarchy of authority that recognizes the tribal government first.

A tribal head Start standards plan could address group size and ratios.

Health and safety transportation, background checks, monitoring personnel and other areas that the final.

Rule Deregulates, while remaining subject to the Head Start, Act, and other applicable federal law.

This is consistent with the NPR's stated goal of local control. If ACF is vacating federal regulatory space, tribal self determination should mean tribes can govern a space.

Not that tribal programs automatically become subject to surrounding state systems.

Add a provision to 1301.17 clarifying that Head Start program performance standards do not create or expand state jurisdiction.

Recognize applicable tribal law, tribal regulatory standards, and tribal CCDF alternatives. Excuse me.

And establish a tribal head Start standards plan pathway where no other tribal standard applies.

Administrative cost cap, we oppose the reductions of the administrative cost CAP from 15% to 5% because of a disproportionately constrained tribal history programs. We also oppose relying on individual waivers as a solution.

Requiring a tribe to complete other federal waiver process to obtain relief from an administratively burdensome.

Rule creates more administrative work, not less.

The NPR points out other HHS programs with 5% administrative cost caps, including CCDF.

But the 5% CCDF administrative cost CAP does not apply to tribes.

Tribal CCDF permits administration.

Expenditures of up to 50%, reflecting HHS recognition at tribal programs, face different infrastructure and administrative circumstances.

The Head Start Act itself establishes a 50% ceiling.

While a statutory 50% CAP is.

A.

Then a.

A ceiling and not a guaranteed allowance by creating a regulation that is more restrictive than a statute.

The NPRM goes against itself described purpose to reduce the scope and prescriptiveness of federal regulatory requirements.

Tribal hairstyle programs must recruit and recruit, retain staff satisfying monitoring and reporting obligations.

Coordinating with federal program staff maintains facilities and transportation systems. And often operates across rural or remote communities.

These costs do not disappear simply because of regulatory cap is reduced.

For our program to 5% amounts to around \$50,000.

For our grant, which is not even enough to cover the program assistance annual salary.

Restore the 50% cap for all head start programs or at a minimum, retain the 50% cap for tribal head start programs like tribal CCDF.

CDF.

Tribal language, culture and curriculum.

We appreciate that the NPR.

'S tribal history programs from the proposed English only requirements.

However, this is still a step back from the current standards, which affirmatively recognizes that tribal language preservation and revitalization.

And expression supports full tribal language immersion.

Additionally, the exception to the English only requirement only applies when the language is being spoken.

In furtherance of tribal heritage, this phrase is too vague.
It does not say who determines whether language use qualifies.
Whether a tribal government is sole authority to make determination.
On whether programs will have document or justify their use of tribal language.
NPRM is also not clear about whether the exception protects immersion programs, use of tribal language throughout the program.
Date family engagement and language restoration efforts in our communities where few foreign speakers remain.
The NPRM also rescinds the existing curriculum adaptation standard, even if the ACF views that the provision.
Is duplicate of the head start day.
Removing it without replacement could create uncertainty without a tribal programs authority to adapt, develop curriculum to incorporate tribal language, culture and community priorities.
Our tribe has adopted a language and cultural curriculum for the tribal early education programs.
We also have a classroom that is getting close to being fully immersed in the Paiute language.
Teaching our children our language and culture is part of the healing process for that which was stolen.
In lieu of the English only exception, retain affirmative protection for tribal language preservation and curriculum adaptation.
At 1302.36 and 1302.32 and clarify that tribal governments have authority to determine determination of tribal language and cultural are incorporated into the head start curriculum and programming, including full immersion and locally developed adaptations.
The NP Rs goal of reducing federal burden should strengthen tribal self determination.
And now replace federal rules with new State Senate requirements that are create uncertainty about tribal authority and program funding.
We urge ohios to work directly with tribal nations.
And.
Al.
AN head start programs before finalizing these changes.
And to ensure the final rule protects tribal sovereignty.
Local program flexibility.
And continue access to higher quality head start services.
Thank you for the opportunity to let me provide testimony today.

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expressed during the oral testimony.

Davy Malie, 1st Lt. Governor, Pueblo of Acoma, New Mexico2:06:32

Thank you very much.

[Speaking native language].

Good afternoon, everyone.

My name is Davey Melee.

I am from the Pueblo of Akama, New Mexico, currently serving as the first Lieutenant governor today.

I thank you very much and and everyone and all the tribal leaders on today's call, just some of the things that the public.

Would like to make reference to as far as the changes one we make reference to push by early childhood education advocates for teacher training, especially in the area of indigenous language instruction.

We recommend that the federal, state, federal and state government create a degree grant program in that particular field where the federal government can help.

All pueblos nations and tribes, with additional funding for teacher training.

And workforce incentives and program support.

In recent actions of the Pueblo of Governors, all Pueblo of Governors to support the efforts by resolution based on their priority concern for language preservation instruction, which should be a major component in early childhood education as a reference from the state of New Mexico for in regards to.

The opio.

ID reference a resolution that was passed.

All Pueblo Council of Governors Resolution number 2026 dash.

13 declaring an urgent need for development of indigenous language and culture

pathways and early childhood for indigenous educators and requested support for indigenous LED Alliance of Childhood Educators, also known as the Adobe Think tank, prepare to design and develop an indigenous early childhood teacher education pathway.

This is only a reference to.

To indicate not only to the Pueblos and and state of New Mexico, but also a reference

for all Pueblos Nation tribes, that our youngest children are our majors, precious our most precious, and hope and happiness for the future of the Pebble people and other troubled nations formation of.

Individual and cultural identity begins in the early development formation and learning experience of our young Indigenous children.

Our youngest children, whose early learning experiences are grounded in traditional language and cultural knowledge, will be able to express and apply the values, beliefs and principles inherited their cultural traditions as they mature and during Pueblo continuity now and in the future, the education and care of our D.

Children from birth to age 5, fully grounded in the cultural language of our respective tribal communities.

Are essential to the participation in.

And contributions to their own communities.

Also.

In with that.

The New Mexico early childhood education and Care department has not yet developed a comprehensive, culturally and linguistically appropriate preparation plan to support and prepare indigenous early child teachers in New Mexico that has been vetted and supported by indigenous educators and leaders.

New Mexico Governor Michele Lujan Grisham made additional investments in universal Child care, recognizing that the family stability, workforce participation, and New Mexico future prosperity.

Which includes Pueblo people.

Also declares and supports for the indigenous child care early child care teacher education Pathway project.

Also, in reference to that, the Pebble of Akama did submit a letter to the honorable Michelle Lujan Grisham, who is the governor for the state of New Mexico, on February 25th of 2026. In regards to Senate Bill 37, high quality Literacy Instruction Act.

Which the Pueblo of Akama does express our concern exercises a responsibility as a sovereign tribal government and to ensure that legislation affecting our children.

And our language for years to come is carefully considered through the lens of existing laws and tribal rights.

The ACMA Charis language is ancient and unique and is not spoken anywhere else in the world.

Akama has invested significantly in the education of our children, including through the Haku Learning Center, precisely because we understand education, literacy and our language are inseparable.

Currently right now, Mr. Cassandra Sanchez.

Who is the director for the Haku Learning Center? Head start and child care program?

Is our Head Start director currently right now and also one comment that we would also like to address is teaching and learning environment. Proposed 1301.04 proposed to be added English only English instruction, the replacement of.

Non-english books and materials staffing retraining, which is not in favor of the Pebble of Akma, are indigenous language and additional teachings has no cost or price tag.

We don't understand why we would have to also ask for a waiver, why we require waiver to teach our own language in our tribally controlled schools.

And instruction.

Another point is also the group size and ratio ratio proposed 1301.5.

And as reading through, while the preamble of the proposed rule states that programs could keep existing ratios in place, ACF also predicts 668,000 or 668,000,000 cost reduction due to the removal of current racial requirements, resulting reduction in teaching staff.

The regulatory impact analysis further estimate under the maximum scenario a 24% reduction in teachers and 32 percent increase of children per teacher, reducing the size of our teachers. Teacher force is not the answer we are in need of of high educated teachers.

In in our school system, the Pueblo Vaca concurs with tribal testimonies as as we as native indigenous nations, tribes and pebbles.

Share the same challenges. Governor Charles P Riley and the tribal council send their best regards, and the Pebble

of Akama will also provide a written testimony.

I thank you again for all your time as well As for all our tribal leaders who are on this call today.

Many wishes and and success through each and every one of you for all your tribal nations and tribes and your children.

Thank you very much.

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Wayne Buchanan, Policy Council Chairman, Muckleshoot Indian Tribe 1:55:50

Oh, perfect.

[Speaking native language].

Good day everybody.

My name is Wayne Buchanan and I come from Muckleshoot.

Thank you for the opportunity to engage in this government to government consultation on ACF known as a proposed rule making for the reducing federal burden for head start programs. This little bit of background on me. I currently serve as.

Our head Start Policy, Council chair.

For the Muckleshoot Early Learning Academy on the Muckleshoot Reservation in Auburn, WA, and today I speak on behalf of the Muckleshoot Indian tribe.

I'm actually I have two children who are currently receiving head start services from our Mila program.

And and me myself.

I also struggled early in life with my speech, but I actually received services through head start, as in my father and my own grandmother was a head start teacher.

And so today I'm actually a PhD candidate, and in that effort I I bring that effort here today and use my voice to for those children who deserve the same opportunity that I received as a child, especially my own kids, right?

So just some context. Muckleshoot was one of the first tribal head start programs in the country and our head start has proudly served our community for 61 years.

And we currently serve 90 federally funded children.

In families with tribal funding supporting another 36, we also support 26 head start staff and 15 in House Special education staff.

My son has an IEP and I have seen first hand what early intervention at head start and Special Education services can do for him.

And he has made real, measurable progress towards kindergarten readiness, especially this year, so.

To this end, Malcolm supports the unnecessary administrative burden for the federal government. But mugshot does not support removing federal protections that establish a consistent floor for the safety development.

Health and well-being of our children and families, we ask the ACF to retain federal child to staff ratios and group size requirements.

Retain protections limiting suspension and prohibiting expulsion, including behavioral intervention, mental health consultation, family engagement, and individualized supports.

Retain federal health and mental health protections, including the health and mental Health Services Advisory Committee advanced parental authorization, ongoing health consultation and one of my favorites, daily oral health practices.

They also asked to retain the federal bus monitor requirement is incredibly difficult for a driver a bus driver to focus solely on safely operating the vehicle when there's tons of kids in the back, right?

A second trained adult has to be able to help young children with seating, you know, and harnessing behavioring.

My own son has had accidents on the bus, right?

Any sort of emotional distress or an emergency?

So removing that federal requirement should not result in a lower level protection just because another jurisdiction may permit it.

Remove the proposed English only requirement while supporting English acquisition and protecting the developmental and cultural importance of children's home languages, especially tribal languages.

Towards that end, we asked to retain section 1302.36, the tribal language preservation and revitalization, rather than replacing it solely with an exemption from the English only requirement. In our opinion, tribal nations must determine how their own languages and cultures are used in.

Their programs.

Any healthy marriage or family strengthening initiative must also respect LGBTQ plus families.

And all family structures.

I also want to explain what these protections mean in practice. So Muckleshoot funds with some BIE support special education services for our children's ages 0 to 5.

This includes referrals, valuations, IEP development and services that happen directly in our own head start classrooms and from personal experience, I've seen my son's progress on what a coordinated early intervention and individualized.

Port can accomplish.

Especially this year, I'm seeing measurable progress within my own son who has difficulty speaking.

We're a trilingual household.

We speak our own tribal language. English, of course, and Spanish.

As ACF considers changes to these performance standards, that coordination and

support for children with with disabilities should not be weakened, and tribal sovereign must also remain clear.

So first and foremost, Malkaju asked ACF to retain these federal protections.

And if ACF removes or changes its federal standard, that should not be interpreted to create or expand state authority or state law is not otherwise applicable or leave any sort of ambiguity about what standards govern tribal head start programs, tribal regulatory authority, and self-determination have to be pres.

And in closing, meaningful government to government consultation must effect the outcome.

Muckleshoot asks ACF to extend the comment.

Period. Or provide another tribal specific opportunity after consultation and to provide a written response explaining how significant tribal recommendations were considered and the rationale for accepting or rejecting them.

My grandmother helped build this head start legacy here at Makushu.

Today I carry it forward as the Policy Council chair and I'm very passionate about it because my two children are also within our head start programs.

So these are not just abstract regulations, they they determine whether our children are safe, supported, connected to their language and their culture, and given the opportunity to succeed. Multishot also invites you all to visit us. See our facilities, meet our staff and families and

see first hand how this work is creating a stronger Community and stronger individuals.

Take weeds to blue fled.

Thank you for this opportunity to.

Talk about what priorities we have.

And with that said, thank you.

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Herman Sanchez, Tribal Administrator, Santo Domingo Early Childhood Learning Center, Santo Domingo Pueblo 1:47:47

Great.

Well.

You know Adam and director white.

And Todd, it's it's really nice to see all of you today and and and and please give our best to the secretary and deputy Secretary, Admiral Christine and Kim Coble and Carmela Roybal.

I mention all of you for a reason, because now we've we've been to DC many times and you've always made us feel very welcome and you've always made us feel that we've been heard.

And and and it's a true partnership. And I just want to commend you and and and hope we can continue that.

And and again, we'd love to see it down here in Santa Domingo.

Our heart, our thoughts and prayers go out to the Alaskan tribes.
I know you guys are struggling right now.
So we we certainly wish you the best, but.
You know, there's a common theme here that I see.
And and and and it's no different in Santa Domingo.
Is is.
Head Start is an anchor of our community as it is with all the other tribes.
That's a common theme.
It's an anchor, you know? And and there's data.
This isn't hermit data.
This is actual data that native children historically. Have have not gotten the best education compared to non non non-native kids.
That's just true.
OK. And these head start programs?
Again, data show that.
Our our kids that go to head start.
Have a a much better chance of of.
Graduating high school and going on to college and living strong, productive lives, you know, providing for their families and the way I look at it is we can either invest in our children now and give them.
A chance for a bright future?
Or we can ignore it and deal with it on the other end through high unemployment, higher snap benefits, maybe legal troubles.
I don't know, OK.
I prefer.
To give our kids a chance, you know, we at one time we had a census of 214 and the funding that we received was adequate for that. Now right now we we had to lower our census to 133.
Same same funding.
But it's still inadvert.
You know we're we we have.
We have 33 children right now that have been identified with special needs and we talk about the 15% administrative cost.
I hear our fellow tribes, you know, saying we should keep it at 15. I think it should go higher than 15, to be honest with you.
You know, we're going to put a pencil and paper to it.
It should really be more like 25%.
We don't pay IDC.
Our head start does not pay IDC, which is support cost for accounting and HR.
IT and other services. OK, that has to be subsidized.
That's the reality of it, you know, you know.
You know.
I'm real grateful for you guys because you've been very supportive of Santo Domingo and I can only speak for Santo Domingo on this but.
You have allowed us to create a really strong partnership and and and we're so appreciative of that.
You've you've advocated for us and we appreciate that, you know, but those that know me know that I'm very candid and direct too, you know. And you know, we talk about

trust and treaty responsibilities and you know, it's not like the federal government comes to each and a big.

Big fat check every January and says OK, here's the money for your trust and treaty responsibility.

It's done through grants like the one that we received through head start.

That's how you.

Fulfill your trust and treated responsibilities, and then the tribes execute that through the grants.

And.

To to propose that that that tribal nations federally recognized Indian tribes who are sovereign nations.

Have to be in the jurisdictions of state is unacceptable.

It it just is, you know, you know.

You heard the stories and there's so much diversity. Everyone of us is different.

But yet everyone of us share something in common, OK? And.

I always say nobody knows Santa Domingo better than Santa Domingo.

You know we have the Cherokee Nation.

No one knows the Cherokee Nation better than their chairman.

OK. And the same with the Alaskan tribes?

You know, and and into.

You know, to to handcuff the tribes and take that that responsibility away from them is wrong.

You know, every tribe, their culture and their tradition is important to them. You know, here, here at Santa Domingo.

We speak the Karis language, OK? And it's a non written language.

It's been passed on for thousands of years, just like you and I are talking right now.

Verbally. OK. You can't learn that anywhere else. You know. That's how we maintain our culture.

And our traditions is by teaching our kids here, you know. And that's important because, you know.

Most most non natives can't trace their ancestry back for generations.

San Domingo can pass can trace their spec thousands of years, and that's a badge of honor.

I wonder if that the people here where you know it's a badge of honor to to to, to, to restore and maintain that culture and tradition, so.

Full authority to the Indian tribes, OK.

To to to to be able to create their own curriculum that is designed for their, for their specific community, because there's a lot of diversity, all right.

But.

Those are just some comments.

I know that.

I know you and I know you're listening to us, OK?

I just asked that you know, common sense rules the day on this, you know, and and we do the right thing for our children. OK, because.

It truly is our future and we want to give them an opportunity to be successful, right?

So thank you for your comments.

Please give your families our best.

And we wish you the best.

Thank you.

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MaryEllen Fritz, Department Director, Aleutian Pribilof Islands Association 1:38:30

For Mr. Jones and Miss Casco White, I'd like to recognize that Todd and his team have been so amazing to work with when we've had some significant struggles in the state of Alaska.

Todd and Deloy Travondia, Jessica Shawna wear a phone Callaway and an e-mail away. When the fisheries industry, which?

Is 90% of our region's income crashed and all of a sudden families that were doing really great, we're not doing great. And so, you know, we had problems when COVID. Just destroyed and decimated the cottage.

Businesses in our tribal service community. There was so much unemployment and problems with drugs and alcohol that just rose and we really struggled to find a way to help.

One of the biggest issues that came up was the head starts under enrollment initiative, which really hurt us hard and I was so grateful that Todd and his team listened to us and we felt as a tribal entity that this was a true government to government solution when. We were looking at the cost that we still had to pay and then the office of Head Start had sent out.

A reduction of enrollment and reduction of funding because of the unenrollment. But you know, families had to go where the jobs where they have to pay their rent and feed their families. And because we had such small remote communities, a lot of our tribal members left and they came to anchorage, where they could find the jobs to pay for.

The housing and for their food.

But that didn't leave the the children and the families who were left in the communities, you know, without head start. And so I was so grateful, Todd, for you and your staff to come to the occasion and meet

with us so many times and look at our situation and come up with a solution that wasn't a general paperwork.

Take the number of kids divided by your enrollment and cut that enrollment.

Thank you for listening to us as a tribe.

We really felt honored and respected during that time. We're on the up and up now. The fisheries haven't improved, but we are working with our tribal members in their employment and training to look at alternative resources and tell the fisheries be maintained again.

We have a very large fish processing plant that's going to be opening in the next two years in Unalaska.

That we're just really working so that our families can come back and come back to their tribal lands and to be able to provide for their families.

So thank you, Todd, for that. I'd like to also talk about some approved by our President and CEO, Mr. Dimitri Filimov.

For tribal consultation points that we brought up in 2022 that I'd still like to bring to our table because I believe they affect currently not only our situation but tribes across Alaska and also our nation, I'd like to bring to the table that tribe should.

Annual flexibility in the number of enrolled children each program year based on the current community needs.

Assessing assessment with existing funding without penalty, we're going to see enrollment come and go and rise and decrease and to to have to be able to rewrite funding applications and to do all the things you have to jump through the hoops. If ten children leave a small community, or if there's going to be 10 more, we we really need to work in tribes.

Would benefit from having the flexibility to be able to establish their funded enrollment within expectations and within, you know, being economically.

Regulate all the things that we want to do the right way, but we also have to have that flexibility. So you know our our heating costs and Unalaska are \$2000 a month. And as Caroline said, if ten kids are there or if 100 kids are.

There, that heating cost is the same and so.

I really want to make sure that it stays flexible, that tribes can be able to have that allowability to state what their enrollment will be when there are fixed costs involved.

I was really excited when the office of Head Start ruled out the staff wage increase and benefit increase and match the schools, but it didn't come with additional funding and you know that's impossible to do. If you get \$1000 a month and to match the school. It's going to be 3000, but.

You know the office manager start trying to make it happen as you can.

We really have to make sure that new mandates that come out include the funding cost to be able to meet that mandate.

So I'd like to make sure that that comes to the table.

With our administrative costs, Caroline already touched on it, but you know it costs a lot of money to administer a program and you know, we're not fortunate to have casinos and other business endeavors here in Alaska. And so we really want to make sure that. The administrative cost for each individual tribe is listened to and honored, and also for the office of Head Start, to honor the indirect cost rate that's already been negotiated with the federal government. We also want to make sure that.

Tribes monitor their own assessment for their quality of services. We have a government to government relationship. Our annual self-assessment document should be sufficient. And not have to undergo federal monitoring reviews where sometimes they come two times a year. If you have AFA one and FA2 and the CACFP and the E i.e. I/O all of those things happen. And when we just want to make sure that our govern.

To government relationship is honored and our annual self-assessment should suffice for that and not have to plan for the expense and cost and the the all the things that happen when a federal review takes place.

So I would like that to be into the record and again, thank you, Todd for all of your assistance. When we put together the Northwest Indian Head start Coalition's annual training conference.

I'd also like Mr. Jones and Miss Casco White to know that when we had our conference this last month, all of their trainers were concerned about their breathing health with the the nearby fires in Spokane and they and they left and Todd stayed with us.

Till 7:00 PM at night until we had an alternative plan for all of our 200 conference attendees.

So Todd, again, thank you. You're an amazing partner to work with.
I want to make sure that Mister Johnson is Cathcowite hears that and thank you for this opportunity for this consultation.

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Caroline Wolkoff, Head Start Division Administrator, Aleutian Pribilof Islands

Association1:31:27

Yes, I am here, Mary Ellen.

Hi everyone.

My name is Caroline Wolkoff and I am the head Start Coordinator, division coordinator at illusion Provoke Islands Association.

I'm really honored to be here and to provide you with a brief summation of our recommendations. APIA has been in serving children for 28 years and we operate 4 rural and geographically isolated classrooms in Alaska.

We urge the office of Head Start to Protect Core core quality standards and adjust administrative cost limits to reflect the unique operational realities of remote tribal communities. While API supports reducing bureaucratic paperwork, strongly opposes removing substantive program rules or enforcing a strict 5% administrative cost CAP, which.

Threatens the viability.

Of small geographically.

The isolated programs API is request office of Head Start honor each tribal federally negotiated indirect cost rate agreement as a limitation for administrative costs and some of our key areas of concern are that remote Alaska programs face limited

administrative capacity. Competing federal consultation timelines, and complex government struct.

The scope of the MPRM is too broad.

Complex for tribal programs to thoroughly evaluate within the standard common window, and we recommend OHS should should release a formal tribal impact analysis to identify how these changes uniquely affect grantees and should extend the comment

period to to 120 days to allow for meaningful review. API is also concerned about the deregulation of program standards.

API notes that many provisions targeted for dilation appear to be substantive program standards rather than administrative or paperwork burdens.

Removing these risks, stripping away the core elements that define history's high quality and comprehensive services.

Recommend OHS must carefully distinguish between true administrative fluff and essential program standards.

Reform should streamline reporting and eliminate duplication without weakening program quality, accountability or tribal flexibility.

We also support streamlining reporting and removing applicative tasks so staff can focus on direct services.

We advise against deleting substantive program standards.

These core elements are vital for maintaining program quality, accountability and positive family outcomes.

Another area of concern is to the impact of location on rural and tribal programs.

The inflexible rules harm remote areas.

Some of the proposed changes intended to reduce burden actually shift new risks onto isolated communities.

These are unique operational realities. Programs across Lucien and Provo Islands face severe geographic isolation, transportation barriers, staffing shortages, and high utility and facility overhead.

The administrative cost limitations.

Doesn't account for economies of scale for small tribal programs.

That we're faced with fixed well having fixed administrative and compliance costs that do not shrink when enrollment drops a facility in rural Alaska costs the same to run, whether it serves 40 or 100 children. The 5% cap is not doable while large state grantees can abs.

A 5% administrative limit.

It is unfeasible for small tribal grantees with high baseline operating expenses.

Some of the other specific recommendations are OHS must separate true administrative paperwork from essential program standards and should grant tribal recipients to maximum administrative costs. Flexibility allowed by law. API also requests that OHS allow tribal grantees to use their

federally negotiated indirect cost rate to accurately reflect the high cost of operating and remote environments.

We also want to protect tribal authority and self determination in regard to state licensing issues, relying on state systems fail remote Alaska communities where the state

does not currently license remote tribal service areas. API urges the office of Head Start to recognize tribal administration and regulatory systems as.

Equivalent to state and local.

Systems.

Removing federal standards without clear alternatives creates uncertainty for programs operating outside traditional frameworks, and the office of Head Start to maintain a federal baseline for health and safety when no local or tribal standards exist preserving quality.

While respecting tribal self determination, we also recommend protecting Native language and culture.

Head start is a critical structured environment for preserving endangered Alaska.

Native languages and strengthening cultural identity efforts to increase English proficiency must not override or weaken native language instruction and revitalization efforts.

Tribal programs need durable authority and flexibility to integrate traditional knowledge and native languages into daily classroom activities based on local priorities.

We also recommend access to mental health services.

It is a critical lifeline in remote communities.

With severe behavioral health workforce shortages.

Head start is often the only program identifying social emotional needs and connecting families to care for families with young children.

Existing performance standards provide the framework APIA uses to secure budgets.

Establish partnerships and bring periodic behavioral health providers to remote areas.

API supports reducing administrative paperwork, but urges OHS.

To maintain the actual requirements for mental health and comprehensive services that support the whole child, these are some of the concerns that API has and I'm I thank you for the opportunity to speak and for you to hear are the important issues to us.

Thank you. On behalf of Apia.

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Jeremy Oyenque, Director of Youth and Learning/Head Start Director, Santo Domingo Pueblo 1:25:28

Welcome everybody.

Todd, was it?

Good afternoon, director White, deputy chief of Staff, Jones.

Good morning or good afternoon. I guess we just passed it here in New Mexico.

My name is Jeremy Yankee, and I'm here on behalf of Governor James Murano of Santa Clara Pueblo. Just like many of our colleagues and other tribal leaders have stated, Santa Clara supports the efforts to reduce unnecessary.

Federal requirements when these changes strengthen travel, self determination, and allow tribes greater control over how heads are delivered, our primary concern is that

the proposed rules sometimes replaces federal requirements with references to state law without consistently recognizing tribal law and tribal jurisdiction.

The final rule should clearly state that for Indian tribes or agencies, applicable law includes federal and tribal law and that state and local law applies only where it is otherwise legally.

Applicable.

A federal regulation should not create state jurisdiction over tribal programs by application, as many of the tribes have stated.

Santa Clara Pueblo strongly opposes reducing the administrative cost limitation for 15% to 5%. Administrative costs support essential functions such as accounting audits, human resources, procurement, compliance technologies, facilities and tribal governmental oversight.

HHS own analysis indicates that.

Average head start administrative costs are approximately 11.2% and very few programs currently operate at or below 5%.

We asked HHS to retain the 15% limit or establish a tribal exemption that recognizes indirect costs.

Shared governmental services, rural conditions and limited economies of scale.

Economies of scale for tribes, we strongly support protection of tribal language instruction. But languages should be. But the language should be broader.

Tribal government should determine.

And how our own languages are used in education, family engagement, cultural instructions, language and revitalization, and intergenerational learning.

Tribe should not have to justify individual uses of our languages to HHS or OHS. The final regulation should also expressly preserve the authority of Indian history agencies to determine eligibility without regards income and to prioritize.

Tribal children were authorized by federal law.

These protections should be in regulation itself.

Not only discussed in the preamble.

We support the increased flexibility.

We'll urge HHS to maintain a clear federal floor for child health, oral health, behavior, health, safety, transportation, disability services and protections against exclusionary discipline.

Rural tribal communities often have limited alternative providers, making head start and especially important connection to these services.

Tribal governments must retain authority over workforce qualifications and tribe should be able to determine when a degree or credential is appropriate, while also recognizing tribal language fluency, cultural knowledge, community experience, and traditional teaching expertise.

Before it tribal Head Start program is placed into open competition terminated or denied funding. HHS should provide meaningful government to government consultation, technical assistance, rein findings, and reasonable opportunity to correct the issue.

State or local LIC.

Ensuing action should not be considered where the outside authority actually has lawful jurisdiction. We support broader waiver authority, but tribal waiver requests should receive timely decisions written. Reasons for any denial and opportunity for government to government consultation.

Finally, this is a significant restructuring of Head start regulations. Indian Head start agencies need time for legal review and tribal governing body Action Policy Council review.

Policy revisions.

Staff trainings and budget changes.

We recommend at least an 18 month tribal implementation period with tribal specific guidance developed through consultation. Santa Clara Pueblo supports meaningful regulatory reform, but reform should strengthen tribal authority, not substitute state authority or federal authority on behalf of Governor Naranjo and Santa Clara Pueblo. We ask HHS to.

Revise the final rule to protect tribal sovereignty, tribal language and culture.

Adequate program funding, essential child and Family Services, and meaningful government to government relations. And thank you, Todd, and we will be submitting a written documentation as well.

[Speaking native language].

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Teresa Paukan on behalf of Jonathon Ross, Chairman, Cook Inlet Native Head Start

1:22:48

Yes, he has asked that I share for him.

He is John Ross is the chairman of the board for Cook in the native head start.

I'm the executive director at Cook, and that native head start, John Ross, is also an authorized representative for the Salem Ad Hoc tribe.

So he's he shared that slashing our allowable administrative overhead to 5%.

Does not free up money for services. It threatens the very infrastructure that keeps our doors open safely.

Also a concern is regarding the vague English only exceptions and how they threaten our sovereign right to active native language immersion.

And that's the message that I got to share for him.

Bye, Anna.

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Paulette Moreno, Vice President, Central Council Tlingit & Haida Indian Tribes of Alaska 1:07:42

Great. Good afternoon.

My name is [Speaking native language].

I am of the clean AD clan and a child of the Cogwanton.

Good afternoon.

I am the 6th Vice President of Central Council of Klingon, Haida Indian tribes of Alaska.

On behalf of the clinic and Haida, I appreciate the opportunity to speak directly with the office of Head Start about.

The proposed changes.

To the Head Start program performance standards clinical Tindhida is a federally recognized tribal government representing nearly 39,000 tribal citizens. We serve families across SE, Alaska and beyond, including communities that are remote, rural, and accessible only by air and water.

Our Head Start program serves children and families.

Across 10 SE Alaska communities for Kinkat and Haida head start is much more than an early childhood education program.

It is an investment in our children, our families, our cultures and our communities and our future, and that is why we are here today.

Kinkat and Haida supports the goal of reducing unnecessary federal burden, but.

Reducing federal burden must not come at the expense of tribal sovereignty, tribal authority, or the ability of tribes to determine what works for their own children and families.

Tribal sovereignty must remain at the center.

Our primary concern is that the MPR Ms. Reliance on state licensing local requirements. And other outside standards when federal requirements are removed.

For tribal head, start removing a federal standard does not give a state authority over a tribal program. If the federal government is stepping back in, giving programs greater flexibility, that flexibility must recognize the sovereignty of tribal governments.

Lincoln Hayida should be able to determine the standards and practices.

Is that are appropriate for our head start programs consistent with the Head START Act and other applicable federal laws we should not have to choose between federal requirements and being subject to a state system that was not designed for tribal governments or Alaska Native communities local control.

Must mean.

Tribal control.

Alaska is different.

I also want to emphasize the realities of operating a tribal program in Alaska.

Our communities are separated by hundreds of miles, mountains, waterways and weather conditions that can make transportation and access extraordinarily difficult.

We operate in communities where workforce recruitment.

Facilities, transportation and administrative capacities are persistent challenges.

Those realities have a cost.

The draft comments correctly recognize that tribal head start programs face different infrastructure and administrative circumstances, and that triggers CCD programs retain a 15% administrative allowance.

Plinkit and Hidea strongly opposes reducing the administrative cost cap for tribal head start programs from 15 to 5%.

A lower cap does not eliminate the cost of serving our communities. It simply shifts those costs somewhere else and ultimately threatens the resources available to serve

our children.

And families, if the goal is to reduce administrative burden, requiring tribes to seek individual waivers to address an inadequate cap is not the answer.

We urge OHS to retain the 15% administrative cost CAP for tribal head start programs.

S.

Our languages and culture are not optional.

I also want to speak about something that cannot be measured simply in administrative terms.

Our culture and our language.

Planket and Haida is actively working to bring traditional languages, values, art and cultural knowledge into early childhood education.

Our early Education division has developed.

Curriculum through an indigenous lens and has incorporated SE Alaska tribal values into children's learning.

We are seeing the impact of that investment. Children who grow up in head start classrooms are learning their language, learning about their culture and developing a sense of who they are and where they come from.

Some of those children are now growing up to become teachers themselves.

That is what self-determination looks like.

The proposed rule should not merely give tribal language.

An exemption from an English language requirement.

It should firmly protect the authority of tribal governments to determine how language, culture, elders, traditional knowledge and community priorities are incorporated into their programs.

Our children should not have.

To leave their culture at the classroom door.

Flexibility should remove barriers, not create new ones.

Clinton Haida has significant concerns about the changes that could create unnecessary barriers for our families trying to access head start.

In our communities, family structures and caregiving arrangements do not always fit neatly into convenient into a convenient model, a grandparent, a.

See Extended family member or another caregiver may step in to care for a child.

The caregiver may know exactly who that child is and how old they are and what they need, but may not immediately have a birth certificate or other documentation in hand.

A paperwork delay should not become a barrier to the eligibility of a child.

Build who needs to receive Head Start services?

We support appropriate safeguards and program integrity, but tribal programs need flexibility to work with families while documentation is obtained particularly.

In communities where records may need to be attained from another jurisdiction or community.

The existing framework recognizes this practical need.

The final rule should preserve it.

A final word on self-determination. I want to close by emphasizing something I believe is at the heart of this consultation.

For decades, tribal governments have been asked to operate programs designed in Washington.

DC under the rules developed without sufficient understanding of remote coastal communities, we know our children.

We know our families.

We know our communities.

We are accountable to them.
Clinch it and hit us. Supports efforts to eliminate unnecessary federal.
Your requirements and give tribal programs greater flexibility, but that flexibility must actually reach tribal governments. If federal requirement is removed, the answer should not automatically be state control.
If a federal requirement is no longer necessary, tribes should have the ability to determine what remains.
Necessary for their communities. If the federal government wants to reduce administrative burden, it should not replace one set of federal burdens with new state requirements or additional waiver processes.
And if we are serious about improving outcomes for native children, we must give tribal governments the authority and resources.
To build programs that reflect our languages, our cultures, our family values, and our tribal communities.
Our children deserve nothing less.
We urge the office of Head Start to work directly with tribal nations before.
Finalizing this rule.
And to ensure that the federal regulations strengthening tribal sovereignty, preserve tribal authority and give tribes the flexibility to serve their children and families in ways that work for their community.
I and many others in coastal Alaska and in the families we serve. Are graduates of Head Start program.
Programs we thank you for your services.
We ask that you take these words to heart, that you implement them as you work with our nation.
That true, meaningful consultation reflects what our tribal nation leaders and representatives are saying.
We thank you very much for your time.
We thank you for being with us today and in our language. Thank you.
Is [Speaking native language].

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Peter Lengkeek, Chairman, Crow Creek Sioux Tribe of the Crow Creek Reservation, South Dakota 55:22

OK.

Yes, I have testimony.

I just tried to turn the camera on, but nothing there.

But you can hear me anyway.

And that's all you need.

OK.

Good afternoon, my name is.

My name is Peter Lenke, chairman of the Crow Creek Sioux tribe, and I appreciate this

opportunity to speak directly with the office of Head Start regarding the future of head start and early head start in Indian country.

Head start is not simply an early childhood education program.

In our communities, it is part of the infrastructure that keeps our families and communities strong for tribal nations, head start supports education.

Nutrition, health, family stability, language, culture, social and emotional development of our youngest tribal members and citizens. For many families living in rural Indian country, head start may also be one of the first places where a child and family are connected.

With a broader system of services as the office of Head Start considers significant changes to the Head Start program performance standards, I want to emphasize several priorities of the Crow Creek Sioux tribe.

Tribal sovereignty must be the foundation of these changes.

First, any effort to increase local flexibility must recognize tribal sovereignty and not state authority.

As the governing principle for the head start, tribal head start programs, we support reducing unnecessary federal administrative burdens.

Tribal nations have long asked the federal government for greater flexibility and less bureaucracy, but flexibility for tribal programs cannot mean simply transferring federal authority to the states, tribes or sovereign governments.

We are not political subdivisions of the states.

And tribal head start programs operate within distinct governmental, cultural, geographic, and legal environments.

Where the proposed rule differs to state policies or state standards, there must be a clear tribal pathway that recognizes the authority of the tribal governments to establish standards appropriate for our own communities.

Our recommendation is simple. Wherever the regulations recognize state authority.

Or state standards.

They should equally and explicitly recognize tribal government authority and tribal standards for tribal head start programs.

We want to protect tribal flexibility without lowering quality.

Second, Crow Creek supports meaningful flexibility.

Our communities know our children, our parents, grandparents, elders, educators, tribal leaders, and understand what are the needs of our children.

But reducing federal burden should not become reducing services for children.

Any regulatory reform should preserve the comprehensive nature of head start while giving tribal programs greater flexibility in how those services are delivered.

That distinction is important.

It gives us flexibility in administration.

And also give us flexibility, design, culturally appropriate programs. It gives us the flexibility to address workforce shortages and coordinate tribal programs.

But continue investing in health, education, nutrition, safety and the development of our children.

3rd we need a realistic approach to workforce requirements in rural Indian country.

We cannot regulate our way out of a workforce shortage.

Coal Creek and other rural tribal nations compete for teachers early head start, head early childhood professionals, behavioral health providers, health professionals and other qualified staff in areas where the workforce is already extremely limited.

Federal credentialing requirements should not prevent tribal communities.

From employing individuals who possess invaluable cultural and community knowledge. This is particularly important for our native language speakers, elders, cultural educators, and community members.

Affluent Dakota Speaker, for example, possesses knowledge that cannot be measured by a college transcript.

CHS should provide tribal nation's maximum flexibility to establish culturally appropriate qualifications and pathways for native language and cultural educators, while continuing to support professional development.

Our 4th recommendation is to strengthen, not diminish, the role of native language and culture for our children. Cultural identity is a protective factor.

Our traditions are protective factors.

Our ceremonies are protective factors and our way of life is a protective factor. Our children should see themselves, their families, their history, their language and their community reflected in their earliest educational experiences.

Head start is uniquely positioned to help tribal nations interrupt generations of federal policies that separate native children from their languages and culture.

We also ask OHS to recognize that tribal leaders are seeing across Indian country.

Our children, our families, are facing increasingly complex behavioral health issues and social challenges.

Early childhood programs are one of our greatest opportunities for prevention we can support.

Children early.

Strengthen parents.

Identify developmental or behavioral health concerns.

Connect families with services and build strong cultural identity.

We can change trajectories before children enter the K through 12, system head start must remain connected to the behavioral health, public health, child welfare, education, and family support systems for tribal communities.

These systems cannot operate in isolation.

Rural transformation and facilities must be recognized. The realities of operating head start in rural reservation are very different from operating a program in an urban community.

Our families may travel significant distances to access services.

Transportation is expensive.

Vehicles, fuel maintenance, insurance facilities, utilities and qualified drivers all costs more.

Facilities are also a major concern across Indian country.

A tribal.

Nation cannot expand enrollment simply because federal regulations allow greater flexibility. If we do not have adequate classrooms, buses, staff and facilities.

OHS should establish stronger and more accessible tribal head start facilities funding and recognize transportation and geographic isolation in these funding decisions.

Funding must match the federal expectations.

Finally, none of these reforms will succeed without adequate funding.

Federal policy cannot continue adding expectations or expanding access.

Without.

Providing tribal programs the resources necessary to deliver those services.

Inflation has increased the cost of food, transportation and utilities, insurance, construction, maintenance and personnel.

Tribal head start programs need Predictable base funding that reflects the actual cost of delivering comprehensive early childhood services in rural Indian country.

We therefore ask OHS and E administration to work with Congress to increase funding for American Indian Alaska Native head start and early Head Start program.

Programs and ensure that tribal funding formulas account for rurality transportation, workforce, cost facilities and actual costs of providing culturally responsive services.

In closing.

The Crow Creek Sioux tribe.

Wants to emphasize.

The reducing of unnecessary federal bureaucracy, but the answer to federal over regulation is tribal self determination, not greater state control over tribal programs. If the administration wants to return decision making to local communities.

Then in Indian country, that means returning decision making to the tribal nations trust.

Us to know our children.

Trust us to know our families.

And give us the flexibility to incorporate our language and culture.

Give us the resources to recruit and retain our own workforce.

Give us the infrastructure necessary to serve rural communities and maintain the federal government's direct government to government relationship and responsibility to tribal nations.

Our children are the future of our nations.

Investments made during these earliest years will determine the health, strength and well-being of our community for generations.

On behalf of the Crow Creek Sioux tribe, I thank the office of Head Start for this consultation and for the opportunity to provide these recommendations.

Pedamya, thank you.

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Amber Caldera, Chairwoman, Port Gamble S'Klallam Tribe44:39

Yes, thank you.

Good afternoon.

My name is Amber Caldera and I'm the chairwoman of the Port Gamble Scalarum tribe located in Washington state.

Thank you for the opportunity to provide comments on the proposed changes to head start.

These changes are significant to our Tribe's robust early childhood Education Department, which applies a single set of policies and procedures to our head start and CCDF programs.

To offer comprehensive streamline services to our community as a former head start

participant and parent, these changes are also personal to me.

I credit head start for providing me with the wrap around services that allowed me to become the tribal leader that I am today.

Testimony today will cover a range of topics, but our tribes position on the NPRM is anchored in a foundational principle. Tribal head start must remain a quality wrap around service anchored in tribal sovereignty, culture and community.

Federal officials have been quick to reassure tribes that most of the proposed changes are designed to be permissive and to remove restrictions around tribes ability to administer their programs in innovative ways.

But as my testimony and our written comments will make clear, the NPRM does not always fully implement this intent in a way that supports tribal sovereignty and our ability to provide the services we know our communities need.

To begin, the proposed reduction of the administrative cap from 15% to 5% is untenable for tribal programs and creates a standard, more stringent than the Head Start Act.

Federal officials claim that because the NPRM Racine so many birds and regulations, administrative costs should dramatically decrease.

And if they do not, tribes can request a waiver of the 5% cap.

But tribal programs face unique challenges that increase the cost of head start.

Administration such as remoteness, staff and leadership turnover and workforce shortages.

Other HHS program HHS programs like the tribal CCDF account for these challenges with a 15% administrative cost cap, the Head Start Act itself has a 15% cap.

Why would the MPR M Create a standard, more stringent than statute?

A waiver process is also not a viable solution when the the vast majority of tribal programs will face extreme difficulty meeting a 5% cap.

Therefore, we recommend restoring the 15% administrative cap for all head start programs, or at least restore the 15% cap for tribal programs.

Additionally, we we oppose the new requirement that head start instruction be conducted only in English.

If the administration's goal is to empower tribal communities to have maximum control over their head start programs, the performance standards should not infringe on our tribe's sovereign authority to determine how best to offer our services in compliance with the Head START Act.

The proposed exception for tribal programs from the English only requirement when the language being spoken is in furtherance of tribal heritage.

Is also deficient and vague.

This exception is a step back from the current standards.

Which affirmatively recognizes tribal language preservation and revitalization and expressly support full tribal language immersion.

The proposed regulations do not define in furtherance of tribal heritage or state who will determine if tribal programs meet this requirement.

Therefore, we propose eliminating the English only requirement in maintaining the existing regulation that affirmatively support it's tribal language revitalization and preservation efforts.

Next, the proposed deference to state licensing requirements, local laws and CCDF requirements and fridges on tribal sovereignty, where state and local requirements would not otherwise apply and creates a confusing patchwork of requirements that will

significantly increase compliance costs.

The port Gamble Scalalam tribe already applies a single set of standards and requirements to its head start and CCDF programs.

Extending state and local requirements that would not otherwise apply to our programs. Infringes on our sovereignty and could result in a reduction in quality when our tribe has set a higher standard than a state or local requirement.

Therefore, we recommend affirmatively recognizing applicable tribal standards as governing tribal head start programs where the federal standards defer to state or local laws and specify in that tribal CCDF applies wherever CCDF standards are referenced.

The port Gamble Scalaum tribe strongly supports children with disabilities.

And behavioral health needs and incorporates early identification, intervention and support services into our Head start programming.

We oppose the recession of performance standards requiring services to be delivered in the least restrictive possible environment, ensuring full participation for children with disabilities, processes and procedures for coordination and other standards that guarantee the highest quality service to our children with disabilities and behavioral health needs.

Federal officials have claimed that the rescission of these standards do not mean that programs may not still operate in accordance with.

Those standards, but we are deeply concerned that the rescission will result in these activities being an unallowable use of head start funds as well as less funding to support these activities.

We urge the administration to include affirmative language in the final rule that confirms that removal of a federal requirement does not, by itself, make the associated costs UN allowable, and that programs may continue to fund.

Local necessary or reasonable activities. When the costs satisfy applicable federal cost principles, we also urge the administration not to request reductions in the head start appropriation to align with the proposed changes. If the proposed changes are truly permissive and flexible rather than mandatory, the administration must continue to. Support tribes in offering the highest quality programs and services they choose to offer.

Thank you for the opportunity to provide testimony today.

We will follow up with written comments that expand on the points I made today. Thank you.

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Governor Raymond Aguilar, Santo Domingo Early Childhood Learning Center, Santo Domingo Pueblo^{33:39}

There you go. Thank you, car.

Thank you again, director Casco White, Chief Chief Jones and the rest of the officer Hester.

Thank you.

So have my voice As for my behalf of my committee, representative Ming, a bubble and my Head Start program again. My name is Raymond Aguilar, junior governor of San Antonio Pueblo.

It's an honor to have a few remarks in behalf of my Community Center to me, as indicated, is very traditional culture.

Senator Domingo, a head start program.

I've just recently celebrated 61 years of educating our youth.

Center to be a public health program was the original a pilot program for our Office of Health program.

So extremely excited. I think we believe we know that we have world class Head start program just like the chief has done community. We believe in our program, believe in our kids and we believe in our teachers and basically we believe in our tribal and haven't inherent thought.

To govern ourselves, to educate.

We are the stewards of our land and community and land base, and as I indicated, the ones yet to come think about those charges in our classrooms and thinking about the head start programs. I myself as a product of the Head start program going through that process creat.

Foundation and opportunities for our future levelers, but I also want to address as a tribal leadership.

Inherent tribal sovereignty.

To govern ourselves, to determine what our education means to us, each tribes and nation across the US should always have the ability to control their own destiny. What education looks to them in their own communities.

Head Start program versus non head start programs are entirely different.

We all learn the one ABC's and the 1-2 threes.

But can I can a community member from Saturday being a puzzle, learn the language and Albuquerque's system?

Or are non-native head start program.

Value accept or or a ways of or tradition. You can't teach the culture in a non-native head start programs.

I'm asking respectfully not to handcuff my teachers as far as taking away the flexibility as far as how to determine what our current looks like in our programs. Who knows better than your own head start program than your own community members, 95% of our head start.

Educators are for my community, are for my community.

Think about that number.

Our own community members teaching our the value, the core values, how to be a good young man, how to get young lady. How to continue talking our language. Charis language as they develop their minds and their goals in the future.

But that is the ultimate ask for me as a tribal leader.

Do not handcuff us. Give us continue giving that flexibility.

Moving forward, protecting our tribal authority and promoting that notice of proposed rulemaking from expanding to any US, expanding any state jurisdiction over tribal head start, including but not limited to staff ratios, class size, health and safety standards at the curriculum. Those are important to us of value 60.

One years of our program being strong and standing.

As we continue accepting our children, I wanna talk about a young man.

And on a personal level.

He went through our program, is still at our program right now as a infant.

Just recently this infant was diagnosed with autism and Down syndrome on a personal level.

This young this young student gets so excited when we talk about in our in our language to see that smile, to see that emotion come out of this young this individual. It's it's truly what we're talking about here. The self determining, allowing us to keep our flexibility and teaching our language in our classrooms to see this in young individual with Down syndrome and tossin, that's one example.

How our flexibility allows us to continue and determine our education curriculum in our program.

Protecting tribal language, culture and the authority to adapt this type of programs is really important.

Went to US office a head start.

You're offering our ears to this morning. Police listen to our message.

Please listen to our our advice and notices and please, I urge you to come out and visit our Head start programs.

Visit Chief Hoskins program in in Oklahoma.

Come visit us in New Mexico, state of New Mexico, because every one of us, we like to share some of the great things we're doing in our community.

As I indicated.

61 years of our head start being strong moving forward for our own community, determined that curriculum is really is what I'm proud of in our community, the flexibility.

I also want to talk about the administrative costs.

That chief hosk can adhere to.

That 50% administrative ceiling.

The APR, the notice of rule making repeatedly removes federal standards and directs programs instead to instead of complying with the.

The state lies in the local regulations or the child care and Development Fund requirements.

This jeopardize in our opinion.

In our opinion, apprentice on the tribal sovereignty taken away our sovereignty, our our answers are fault for those inherent rights and responsibilities.

Speaking for Senator Mingo, we do not have a treaty with the United States government, but we have a recognition through arcanses.

Linking canes.

State canes Spanish canes, those are things that were given us as far as the inherent sovereignty to govern ourselves.

To take care of us. And we all know.

The the the the phrase money talks.

We ask that to continue office at Head Start, providing that funding for us.

It's not all about giving, giving, giving.

Give us the tools and resources and acknowledge that in the past, office has has given us autonomy and the resources and tools our program is working our programs is successful.

For 61 years, being a pilot program.

Our Head Start program is working.

Our program is our kids are succeeding. As I indicated on my example, what heads up can do for our Community, serving as a governor for my community this year.

Is truly amazing.

How can you put numbers and facts of that on my example?

For my community, I'm a role model for my community, for the ones yet to come. I'm a role model for our children and tribes and nation across as a a young.

Tribal leader for our community, please continue giving us that flexibility moving forward.

As I indicated.

I strongly I hear support programs flexibility.

Again, you can't learn.

We all learned A12 3AB CS.

In any of my Santa Domingo students from here, learn how to speak cares and Albuquerque or Cedarburg or local cities surrounding our communities.

No, the answer is no.

Continue supporting us.

Continue working on us with our tribes and nation and pueblos and follow the Head Start Act.

It's there for a reason.

NPR's goal.

Nprm goal of reducing federal burden should strengthen the tribal health.

Not replace federal rules with the State NEWS CENTER requirements or create uncertainty with the tribal authority and program funding.

Director Kasper, I urge you, Officer Hester, continue working with the tribal nation before finalizing some of these changes and ensure that final rule protects tribal sovereignty, local program flexibility and continued access to high quality comprehensive services in closing.

Officer Hester.

I invite you sending me a Pogo.

Todd, we had you on here.

Doctor Casco, director. Casco. What? We had you here? We always welcome you and members of your team.

Please come visit us.

As you know, Santa Domingo's very cultured in our community. Very traditional way of life.

We accept you as family.

We accept you as friends, anybody and ioffer this to any tribes and nation across.

That's online.

Come to Santo Domingo. Come visit our head. Start program.

Come see our kids and spend a little time because.

This young man with his special needs, he is truly amazing.

He's truly the inspiration for me as a continue to stand up and advocate for them, our children, our kids.

So thank you, Tom.

Thank you, Doctor White.

But I also want to continue.

Submitted our position papers.

We're not gonna stop.

We're continue voicing and supporting our kids and our programs moving forward. As I also stand here as governor supporting the other head start programs across the nation.

So thank you very much for opportunity. Appreciate it.

[Speaking native language]

My blessings to you. Continue listening to our tribal leaders.

Thank you.

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Chuck Hoskin, Jr., Principal Chief, Cherokee Nation25:42

Oh my.

My apologies, my apologies.

That was pure gold.

I'll try to capture it again.

Let me say thank you Wando for the opportunity to provide some testimony here responsive to the Head Start program.

I do want to note that you you inadvertently referred to us as Cherokee Nation of Oklahoma, that there's no such tribe as that.

We are the Cherokee Nation. If you could make that correction, I would appreciate it.

It's my honor to represent the Cherokee Nation of the largest tribe in the United States.

477 thousand citizens, we have a reservation of 7000 square miles, located within Northeast Oklahoma.

We operate a wonderful Head start program.

We're very proud of it.

We've operated it since 1978.

We have over 880 children, 69 classrooms we recently.

Replaced all of our head start facilities under a law we called the Bernadet Thompson Early Childhood Education.

That's an \$80 million investment.

We are very serious about head start in the future of head start.

We've built our facilities, our infrastructure around what we understand to be a very powerful, very effective structure of head start as as we've been operating it for decades.

So the opportunity to provide our perspective on the proposed rule, which for the record, reducing federal burden for head start programs.

Head Start programs is something that we appreciate. I should start with where we agree. We support reducing federal requirements that are sometimes duplicative, unnecessarily prescriptive and burdensome. We as tribal nations know our communities, and if we have greater flexibility, then theoretically we can put the resources where they. Belong serving children and families.

But the flexibility cannot come at the expense of travel.

Self determination.

We can't simply substitute federal controls with state control, and that is really principally our concern.

It's our central concern throughout the rule.

ACF proposes deferring to state and local standards on matters ranging from staff child ratios to safety to transportation to attendance and personnel.

But the proposal does not consistently recognize.

The governmental and Regulatory authority of tribal nations.

Just by way of example, the Cherokee Nation is situated in the state of Oklahoma. The state of Oklahoma, across many, many rankings, is usually in the bottom five of public education. If the Cherokee Nation wanted our children to get early childhood education, according to the state of OK.

Standards. We wouldn't operate our own Head Start program.

We wouldn't operate a range of other programs, so I think it's critical that ACF understand that if this.

Rule results.

In supplanting federal control for state control and ignores tribes authority and our expertise in this area, it's going to be very problematic for the Cherokee Nation and I suspect many tribes across the country in some places in the proposed rule, tribal licensing authority is recognized in other places.

Tribal authority is absent even when there's an explicit reference to state authority that has to be corrected.

We we can only assume.

And that was an oversight, because if it was purposeful, then it would really be running roughshod over federal tribal relations.

And I just don't believe that ACF would have intended that when the rule recognizes state or local standards, it should recognize equally tribal, governmental and regulatory authority that we should not have to rely on state standards to administer programs.

For our own citizens in our communities.

Direct your attention to proposed section 1301.17 Title tribes.

That section should be strengthened.

It does address important tribal issues, but it does not establish the broader principle that tribal law governs where tribal programs are concerned.

ACF should make clear that references to state or local standards do not displace applicable tribal law for Indian Head start agencies.

Federal deregulation should mean greater tribal self-determination, not greater state authority over tribal programs.

We also caution ACF to to as ACF considers eliminating federal quality standards.

Remember what I said at the top of my remarks?

We've invested \$80 million into replacing all of our facilities.

We are serious about putting our own resources into head start and we've done it on the basis of a great federal tribal partnership, which includes federal standards.

So if ACF proposes eliminating the federal.

Staff child ratios with group size requirements.

Even while acknowledging that current federal standards are more stringent than most state standards, this would mean very different head start experiences for children simply because they live in different states. And as I've noted, it may leave Cherokee children at the mercy of standards from the state of OK.

That is not acceptable.

We've got similar concerns about eliminating health and mental health requirements, including mental health consultation.

And assistance navigating health systems.

And we support flexibility, but flexibility should not come at the expense of comprehensive services that have made head start successful for generations. For children and families.

We also strongly urge ACF to reconsider reducing the administrative cap from 15% to 5%, administering a complex federal program within a tribal government requires staffing, coordination and compliance system.

A 5% cap does not reflect those realities, and a waiver.

Process is simply not an adequate substitute.

Is simply not an adequate substitute for a workable standard.

Finally, consultation matters.

I was very alarmed when I read about the standards in the media.

Notice and comment cannot substitute for meaningful government to government consultation when proposed standards affect tribal government.

Tribal, governmental authority and the administration of Indian Head Start program.

So we respectfully ask.

ACF to continue consultation with tribal nations before finalizing this rule.

Cherokee Nation does support reducing unnecessarily unnecessary federal burdens.

We support greater flexibility, but that flexibility must recognize tribal sovereignty, respect tribal law, and strengthen tribal self-determination. When the federal government government does that and gives tribal nations the tools and flexibility to serve our communities, tribal nations deliver results.

That should be the guiding principle as ACF moves forward with this rule.

I thank you for this opportunity to provide our insight today. What else?

Transcript posted by OHS on behalf of ACF Tribal Consultation, OHS Session, 8/25/2026

[Luisa Machuca, Kawerak, Inc.](#)

My name is Luisa Machuca. I'm Senior Vice President for Education, Employment, and Support Services at Kawerak, Inc. in Nome, Alaska. We serve the 20 Tribes in the Bering Strait region. We have 11 communities who have Head Start through, our organization. The cost of doing business in rural Alaska is exceptionally high, where we live. Recruitment, retention, travel, shipping, utilities. Facility maintenance and specialized services all cost more in our region than many other parts of the country. This morning, I shared a news article from the Anchorage Daily News that in Chungnak, Alaska, which is just north of where we are in Nome, their gallon of gas went up to \$26. So imagine that Head Start grant that they have. To fuel their facility, that's going to go up substantially. I just wanted to bring that to light, because it is very concerning. Even in Nome, we went up to... it was about a dollar increase. We are at \$7.25, and it will not go down until next summer, because we have to barge in our fuel. Our communities face limited local service infrastructure. Our substitute pools are small, and we've been relying on the substitutes that we have. To keep our centers open, because we have our... our shortage of teachers and people who want to work in our, in our Head Starts, because we aren't able to sustain the amount of pay that

other organizations can pay. Norton Sound Health Corporation, which is our regional hospital facility, they offer a \$1,500 living allowance. People go there to work because they get this extra \$1,500 a month to live. Which is great, you know, we're happy that there's competition, sort of, but... And we're glad that people have opportunities, but this really does limit the hiring pool in our region a lot. So, mental health providers, disability specialists, and other specialized professionals are difficult to recruit and retain. Staffing disruptions quickly affect our classroom operations. We work our best to not close our facilities, and it does disrupt Family... families' lives, quite a bit. Our Head Start program is primarily federally funded, and we do have state dollars that help make up the 20% match. However. The funding and the rising operating costs they do not, meet the need. We had to reduce 9 positions. And most of them were core staff. So... Head Start is one of the most important programs that we have. It's oftentimes the only early childhood education program in our rural communities. There aren't other opportunities. Even with the school districts, they don't also operate, Preschools, so this is usually the first and only opportunity that they have. So... Our recommendations are to protect Tribal authority and the final rule. Where the final rule refers to state and local standards, Tribal government authority must be explicitly recognized. Federal deregulation must not lead to expanded state authority over Tribal Head Start programs. We'd like you to protect Tribal language and culture. Tribal Head Start programs must retain broad authority to provide language immersion, culturally-based curricula, instruction from elders and culture bearers, subsistence knowledge, traditional activities, songs, stories, and place-based learning. Tribal governments and communities should determine what constitutes furtherance of Tribal heritage. Provide Tribal programs a realistic workforce flexibility. In rural Alaska, like I said, there are a small number of qualified applicants available in our communities to fill our positions. Rigid credentialing requirements can make it impossible to staff classrooms. A community member who speaks the local language, understands traditional child-rearing practices, knows our families, and has years of experience working with children may bring expertise that is not reflected on a college transcript. We ask ACF to recognize and allow for competency-based pathways that include Tribal language fluency, cultural knowledge, mentoring, supervised experience, and locally appropriate training. Make flexibility and waivers work for remote Tribal communities. We appreciate the MPRM's movement toward greater program flexibility. For our communities, flexibility is not simply an administrative convenience. Sometimes it's what makes services possible. federal policies. Should account for remote geography and air-only transportation, severe weather and transportation interruptions, limited housing and workforce availability, unusual high food, construction, freight, energy costs, and internet costs. Limited access to specialized health and developmental professionals, small community populations, subsistence seasons, Tribal cultural calendars. and locally appropriate language and cultural program. When a federal requirement does not fit those circumstances, Tribal programs should have flexibility and access to a simple, timely, and predictable waiver or locally designed program option process. Preserve Tribal-specific statutory protections. As Head Start regulations are streamlined, Tribal rights should not be harder to find. We recommend that ACF publish a comprehensive Tribal Head Start crosswalk identifying statutory and regulatory protections related to eligibility, language, service area, designation renewal, workforce requirements, funding, consultation, and Tribal authority. Do not remove Tribal protections from view. We understand the ACF's goal of eliminating regulatory

provisions that merely repeat the Head Start Act. ACF has emphasized that statutory requirements will remain binding even when duplicative regulatory provisions are removed. Our concerns are practical. We think, when Tribal protections disappear from performance standards, Tribal programs, federal reviewers. Governing bodies, policy councils, and technical assistance providers may have to search through multiple statutes, regulations. appropriate provisions and guidance documents to determine what Tribal authority remains. That creates an opportunity for inconsistent interpretation. We ask ACF to develop a single Tribal Head Start regulatory and statutory crosswalk along the final road. That document could, or should, clearly identify Tribal rights and flexibilities related to eligibility, Tribal language, community assessment, service areas, funding, designation renewal, training and technical assistance, workforce standards, Tribal consultation, and the relationship Between Tribal and state authority, and federal reviewers should receive specific training on those Tribal provisions. I appreciate the opportunity to speak and provide testimony. Thank you.