Katie Hamm, Deputy Assistant Secretary for Early Childhood Development
Administration for Children and Families
U.S. Department of Health and Human Services

Via email: OCCTribal@acf.hhs.gov

Re: Tribal TA RFI

Dear Deputy Assistant Secretary Hamm:

We are grateful for this opportunity to provide public comment on the Request for Information: *Technical Assistance Needs and Priorities on Implementation and Coordination of Early Childhood Development Programs in American Indian and Alaska Native Communities.* Like the Administration for Children and Families (ACF), we believe that supporting access to culturally responsive and high-quality early care and education programs is a critical service for Indigenous communities. When technical assistance (TA) is grounded in a strong understanding of Indigenous communities and occurs in true partnership with these communities, it can be a powerful way to support the implementation of early childhood systems.

Throughout these comments, we will be using the term *Indigenous Peoples, Indigenous Nations,* or *Indigenous communities* to refer to Alaska Natives, American Indians, Native Hawaiians, and Other Pacific Islanders living in American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands. This reflects the population served through the Administration for Native Americans (ANA), an office within the Administration for Children and Families (ACF). As not all Indigenous Peoples in the U.S. and U.S. territories orient themselves as Tribes, we often use the term Indigenous community. The comments address the TA needs of all sovereign Indigenous Nations whether federally recognized Tribes or not. Our comments are also based on our experience providing TA not only to Indigenous Nations but Indigenous nonprofits, Tribal Colleges and Universities (TCUs), and Tribal schools.

Background on Child Trends and our researchers

Child Trends is a highly respected, nonpartisan research organization focused exclusively on improving the lives and prospects of children, youth, and their families. For nearly 40 years, decision makers have relied on our rigorous research, unbiased analyses, and clear communication to improve public policies and interventions that serve children and families. Our researchers and evaluators have decades of experience providing research support and technical assistance to a variety of leaders, including Tribal Nations, programs serving Indigenous children and families, early childhood programs, and states. We also provide research, analysis, and technical assistance services through grants and contracts from several federal offices including ACF.

Our research experience and academic credentials show our commitment to working with Indigenous communities to achieve community well-being. Our researchers have worked closely

with Indigenous communities, including teaching, supporting and leading research projects, providing capacity building to communities and researchers, and supporting relationship building between Indigenous communities and researchers to create mutually beneficial research. We bring a background in the social determinants of health and the life course approach to health, as well as training in maternal and child health, and we have experience working with Indigenous communities to develop and adapt interventions, build public health research and evaluation capacity, and strengthen knowledge and infrastructure in the areas of research oversight and ethics. We also have experience with participatory approaches to research, including community-based participatory research (CBPR) or community-led approaches with Indigenous communities.

Our research team also includes a prior employee of ANA who worked closely with prospective grantees, helping them to develop rigorous evaluation plans for their projects, which included clearly defined objectives, goals, and steps to accomplish them. In that role, they also worked with the Native Youth Initiative for Leadership, Empowerment, and Development (I-LEAD) grantees, sharing strategies on engaging youth through photovoice (a participatory research method used to document and reflect on reality through youth taking photos of their communities), culture as a protective factor, and through futures scenarios to help Indigenous youth reach an optimistic future and have positive outlooks. They also advised ACF on their work around missing and murdered Native Americans.

Based on our experience working closely with Indigenous communities through research and TA efforts, we offer the following recommended priority areas for supporting the implementation and coordination of Tribal early childhood programs (question 3.1)

Recruiting, hiring, and staff retention. Many Indigenous communities and organizations struggle with recruiting, hiring, and retaining staff that meet the needs of their communities. Staffing challenges can be due to a variety of factors including, but not limited to, geographic location and rurality, small communities, lack of applicants with needed qualifications and/or experience, non-competitive salaries, and/or the limited duration of the position (i.e., only for the years of the grant). In addition to those factors, many communities face challenges with staff retention because members of the staff may leave to seek educational opportunities or to serve in a national or regional capacity (e.g., delivering early childhood training and technical assistance for federally funded programs and services). These issues can be especially detrimental for federal grantees that need adequate organizational staff for grant and program start dates in order to meet their funding requirements and goals.

It is vital that staffing-related TA is evidence-based and grounded in Indigenous Knowledge, a living body of knowledge that Indigenous Nations, communities, and Peoples have acquired and passed down orally over generations based on observations and holistic and relational understandings of the universe. This is central to addressing colonization and historical trauma, which have determined why Indigenous communities are located where they are and why many Indigenous communities face low educational achievements, poverty, and a host of other adverse current community conditions. We recommend TA providers connect with other organizations with successful staffing approaches to understand new and innovative strategies, such as

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community engagement strategies, provision of housing to staff not from the area, or integration of culture to make the workplace fulfilling. An Indigenous Nation-to-Nation learning model facilitated by TA providers could pair communities with high-functioning programs/services/systems with another community interested in building that capacity through a mentorship model. TA providers could support this approach by facilitating learning/engagement across sites and ensuring that the planning and logistics of working together does not become burdensome to either site.

In addition to facilitating a peer learning model, TA providers can support communities in writing strong job postings, providing insights on where to disseminate job postings based on the type of job being advertised, reaching broader networks for recruitment, and strategies to help with staff retention. TA providers must be equipped to understand how colonization and historical trauma, as well as cultural differences and different governance structures, create Indigenous understandings of recruitment and retention that are different from mainstream understandings. TA providers will need a combination of Indigenous and Western Knowledges[1] to address these adequately. This is also an ideal time for TA providers to capitalize on remote work and training options that have expanded due to the pandemic and resulting shift to a more-virtual workplace.

It is also important to engage TA around strategies to create pathways for building and supporting the early care and education (ECE) workforce in Indigenous communities. It is important to Indigenous ECE programs that they are staffed by community members who are fluent in the culture and possibly even their language. Hiring locally also strengthens the local economy and addresses poverty, which is a condition many Indigenous Nations face. Indigenous communities value education and recognize that Indigenous people have low graduation rates in higher education. In the 2022 ACF Indigenous Programs Conference there was a session held on "Growing Our Own: Building Early Childhood Education Career Pathways in Native American Communities," which may be a useful resource to TA providers. TCUs also train many ECE staff in Indigenous communities. Effective partnerships between ACF TA organizations and TCUs are essential to help connect those trained with projects that are recruiting ECE workers. TA providers can also connect with the Tribal Early Childhood Research Center (TRC) at the University of Colorado Anschutz Medical Campus, Colorado School of Public Health to engage with the work they are doing around ECE training, including their week-long summer institute course in partnership with the Center for American Indian Health at the Johns Hopkins Bloomberg School of Public Health, which has run for eight years and trained 135 students in the course "Early Childhood Research with Tribal Communities."

Additionally, Indigenous Nations, communities, and organizations struggle with getting certifications and licensing required for Native language speakers to be present in ECE classrooms to help pass on the language and culture to Indigenous children. TA providers could pull together resources on what each state requires for certification and licensing so that Native language speakers can work in the classroom and get paid at a level that recognizes their expertise and skills. TA providers could also collate resources for early childhood development training in each

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[1] Western Knowledge is grounded in Ancient Greece and is the mainstream understanding of science and knowledge in the U.S., which is analytical, positivist, and based largely on academic and written transmission of information.

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state and provide this information to grantees so Native language speakers could know where to get education for certification and licensure to engage in ECE.

TA providers can also offer training and help with strategic planning in Indigenous communities and organizations to address how to provide and sustain adequate pay and benefits for these critical roles. College graduates in ECE have the lowest predicted earnings of all college graduates, making only $3000 per year more than the average high school graduate. The training should identify career pathways (e.g, through TCUs, stackable credentials, the development of possible apprenticeship programs). They should also help students attain a degree through hands-on training and by reaching out to Indigenous ECE professionals to learn about their needs and perspectives on training, credentialling, recruitment, hiring, and retention.

Integration of language and culture. TA support related to strategic planning should help Indigenous communities identify local culture and language resources and create a plan for integrating those community assets into their early childhood system. Just as federal funding streams can create siloed programs and services for children and families, funding for culture and language programming within Indigenous communities may not be adequate to facilitate meaningful collaboration with early childhood programs and services. TA providers can help ECE staff assess the landscape of existing culture and language resources available locally, then bolster and make new connections to engage those resources more deeply in their work with children and families.

Data collection, management, data systems, and data sovereignty. Referred to as the "Asterisk Nation" in a report by the National Congress of American Indians (NCAI), Indigenous Peoples in the U.S. and U.S. territories are often left out of data collection, which makes it hard to tell their stories and share their experiences. For example, in a recent landscape scan and white paper developed at Child Trends on ECE compensation, statistics about Indigenous ECE workers were lacking and therefore not included in the document, while detailed statistics on White/non-Hispanic, Hispanic/Latino, Black/African American, and Asian American ECE workers were readily available for inclusion. This lack of reported data makes it difficult to tell the stories of Indigenous ECE workers, to assess their wages, or to report on the percentage of them living in poverty.

There is a need for TA that supports data collection on ECE workers in Indigenous communities, helping Indigenous Tribes, communities, and organizations know what data they should be tracking and how they should manage that data. TA providers can develop a template for data tracking, best practice documents, and training in different data collection, management, and systems. If possible, through TA networking with grantees, TA providers can learn the best practices of other Indigenous grantees and share the information with others. TA providers can also teach grantees about oversampling so that sufficient data can be collected on Indigenous people and programs so that it can be reported out even though Indigenous populations are small.

TA should also include the development of templates for data agreements, with considerations specific to the types of programs/services and families served, ways that data could be used for other purposes (e.g., a research agenda specified by the Tribe, strategic development and planning across programs/services), and guidance about how to make that happen under the Indigenous Nation's terms (secondary use of data in community).

TA providers should deliver education and training on data sovereignty and intellectual property rights, especially as ECE programs are encouraged to integrate language and culture into programs and services (e.g., likely creating content and materials that document Indigenous Knowledge and practices). Data sovereignty and intellectual property rights are important concepts that anyone working with data related to Indigenous communities needs to understand. Research abuse and stolen knowledge of medicinal plants in the past as well as Indigenous Nations losing ownership of language resources to technology companies makes these issues especially important. It is key for TA providers to explain the legal steps needed to ensure intellectual property rights and data ownership to grantees. In addition, there needs to be TA around how to store and protect data on computers. Providing TA that highlight and encourage best practices around data management and protections is increasingly more important as programs have added virtual sessions to accommodate the pandemic context. Such services require new layers of data protection and security as programs meet with families over Zoom and other similar platforms.

Leveraging technology. In some circumstances, technology can be a tremendous resource -- from engaging families and community members, to providing services and connecting people. With the COVID-19 pandemic, we have seen many new and innovative strategies around technology, such as parenting supports like home visiting and pediatrician appointments shifted into a virtual format. TA providers should partner closely with Indigenous Nations, communities, and organizations to assess the ways technology can meet the needs of young children, parents, and communities and support their access to services from home or work, rather than requiring them to travel. Technology may be particularly useful for Indigenous families who need to access services and supports grounded in their own language or culture, but live far away from their Indigenous community. For example, during COVID-19 closures, some Native language programs for youth reported that when they switched to online teaching, instead of just the youth logging in for the language lesson, the whole family would be online to participate. Cultural lessons, like beading classes, have also switched to online formats.

When considering strategies to use technology, it is important to remember there are barriers to high-speed internet access in many Indigenous communities. The U.S. Department of the Interior's Indian Affairs division houses resources around expanding access to broadband internet for Tribal communities. In addition to helping organizations and Indigenous communities assess the value of technology, TA efforts must also help them identify potential barriers to accessing the necessary technological platforms. These efforts should also include strategies for providing families with the technology needed to engage in services and supports. This is especially vital with regards to the geographic and rural barriers many Indigenous communities face, including a lack of fiber infrastructure. It is helpful for TA organizations to provide alternative infrastructure for connectivity, such as hotspots, for the communities to continue their programs even during COVID closures. TA providers can also help connect grantees to other federal programs that fund internet infrastructure so that communities can increase their capacity.

Managing and coordinating separate programs, funding sources, and reporting requirements. Indigenous Nations, communities, and organizations use many federal, state, and community funding sources to provide ECE services. Although every community is different, they may draw down funds from sources related to health, child care, child welfare, housing, and education to

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meet the needs of young children and their families. As such, there is a need for TA and tools to help them streamline and efficiently manage these funding sources to ensure they are accessing and leveraging funds in ways that best meet the unique needs of their communities. TA could include opportunities to strategize potential ways to reduce or streamline reporting requirements across funding mechanisms. This would reduce the burdens caused by multiple interfaces and requirements, and it could also provide examples of ways other Indigenous communities have managed their multiple grants. As reported by NCAI, data collection to meet federal reporting requirements can be extensive and time-consuming for both non-self-governing Tribes and self-governing Tribes. The work of NCAI's Policy Research Center may be helpful to TA providers in understanding both the time required to submit funding reports and strategies for improving overall data capacity.

For example, the U.S. Department of Interior (DOI) allows Tribal Nations to do a Compact of Self-Governance, which eliminates the need for separate contracts for each funding opportunity. This reduces the number of written reports needed each year, which saves time and allows for increased efficiency and less burden on Indigenous grantees. The Self-Governance program started in 1988 as a pilot program but was found very successful and became permanent legislation in the *Indian Self-Determination Act Amendments of 1994*. Self-governance allows Tribal Nations to have greater control over federal funding with less federal involvement, increasing self-determination and capacity building. The Indian Health Service, also a part of the U.S. Department of Health and Human Services like ACF, has a Self-Governance program. This is a model Tribes have asked ACF to consider instituting. TA providers could provide data on the efforts of grantees to manage and report on their grants to help ACF understand the burden.

TA efforts should also highlight examples of the innovative and creative ways Indigenous Tribal Nations and communities have leveraged federal funding to provide services that are grounded in each community's culture, values, and language. For example, the Walatowa Early Childhood Learning Center in Jemez Pueblo in New Mexico, which leverages Head Start funding, provides early childhood education in a full language immersion program in the Jemez (Towa) language. It also provides opportunities for children to participate in traditional cultural activities, like music and dance. Sharing examples like this with other communities can be an important TA strategy.

Beyond managing funding mechanisms, TA around communicating the multitude of programs and services available to families would be valuable. Families need information on logistics, services, and eligibility criteria in one format and one location that is easily accessible. TA providers can help identify strategies for ECE providers to communicate with parents/caregivers of the children they serve. TA providers can also develop sample materials for parents/caregivers, assess communications barriers, and support existing communications efforts. This is particularly important for children and families who primarily access non-Tribal programs or services – like the state's public school system – but would like to participate in relevant cultural and language opportunities.

Indigenous communities building new facilities. TA can help to ensure that the values and culture of Indigenous communities are fully integrated into the design of new facilities by sharing the strategies of other communities and providing peer learning opportunities across communities to offer support. For example, the Oneida Nation built a turtle shaped school for Kindergarten

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through 8th grade to incorporate Indigenous traditions into their building and structured the culture and language classrooms in the center of the shell showing the importance of Indigenous Knowledge. It may be valuable to share resources from experts, like those from The National Indian Child Care Association, which is hosting a conference session on constructing child care centers on April 5, 2022. Also, the Cherokee Nation recently launched two new facilities, the Durbin Feeling Language Center and the Cherokee Nation Woody Hair Community Center, which are designed to teach language and provide spaces for learning and community activities for both children and elders. Sharing examples like the work of the Cherokee Nation may help other Indigenous communities design and implement unique or innovative programs that address their own needs.

Translate research to practice specifically in Tribal settings, then effectively disseminate them. TA can play a key role in helping to translate technical research and data into actionable resources that are disseminated directly to providers/practitioners and Indigenous families so they can be incorporated into practice. For example, the Tribal Early Childhood Research Center (TRC) conducted a Pilot Exploration of Developmental Screening in Tribal Communities (Tribal PEDS) which produced research informed resources for EC providers/practitioners and for Native families about developmental screening. The appendix of this study contains resources in a form ready to be disseminated that TA providers can use. TA efforts should start by searching for existing resources and through published research. Once the information has been found, TA providers can translate the findings into resources that can be practically used in Indigenous ECE settings. These findings need to be disseminated through trainings, briefs, brochures, and other means that Indigenous organizations identify as useful to them.

It is important to remember that if the ECE research that was found did not include Indigenous populations, it may not directly apply to Indigenous populations. Due to histories, traumas, and cultures that differ from other ECE populations, Indigenous ECE is approached differently, as the AI/AN FACES study shows. Indigenous cultural norms differ from those in the mainstream population. This extends to the way their children learn and are taught in ECE and child care settings, which emphasize such things as intergenerational caregiving, apprenticing with Elders, and storytelling to transmit knowledge. It will be vital that TA staff are experienced in Indigenous Knowledge and ways of knowing and that they work with grantees to translate mainstream population research for use in an Indigenous contexts and to disseminate the materials in a way that grantees identify as useful.

Connect TA providers to existing resources and build pathways for TA providers to connect with other Indigenous communities, researchers, and TA providers (3.2)

Effective TA lies in the providers' abilities to connect with other Tribal communities, researchers, and TA providers doing this work. We encourage engagement of ACF TA with TA centers that work for the Administration for Native Americans. For example, these 5 TA centers work exclusively with Indigenous Peoples in the U.S. and the U.S. territories and have regional expertise and Native language expertise in the Native Language Community Coordination TA Center. We also encourage TA providers to engage with the academic community and researchers through conferences and by joining listservs to know what recent research they can draw on in this area,

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including Child Trends' own listserv which users can sign up for on our [website](). Following research centers, academic researchers, and Tribal organizations on Twitter, Facebook, and LinkedIn are also good sources of information.

As relationships are so important when working with Indigenous communities, TA providers need to take the time to build those relationships and make sure they are not offending or traumatizing Indigenous communities, which have a long history of colonization, trauma, and abuse. Building relationships with Indigenous Nations, communities, and organizations takes conscious effort with critical engagement in [positionality, reflexivity, and relationality](). Positionality refers to the social and political contexts that create an individual's identity based on intersecting ideas of race, class, gender, sexuality, and ability statuses. Reflexivity is about what someone does with the knowledge of their positionality. Being reflexive includes reflecting on how mainstream epistemologies (ways of knowing), ontologies (understandings of nature and human existence), and axiologies (values, value judgements, and ethics) differ from Indigenous Knowledge. Additionally, reflexivity involves reflecting on colonization, one's own background, and the different cultural contexts TA providers operate in. [Indigenous relationality]() addresses how an individual's actions and the meanings behind their actions can be understood as part of the relationships they have with others, with different understandings, and with the world. This relationship-based way of living that Indigenous people have - which is based on their different epistemologies, ontologies, and axiologies - makes conscious relationship building so important. TA providers need to understand the different histories, cultures, and norms in Indigenous Nations and communities as well as be critically reflexive on their own positionality to build relationships with Indigenous Nations and people.

We recommend TA providers think critically about the above paragraph and engage in a set of relationship-building steps based on building trust and taking the time to:

1. learn the history of the community they are working with to understand their experiences with colonization and trauma as well as to learn about their culture and way of life;

2. develop a strong relationship with a local contact who can teach the provider about the community, their culture, ways of knowing, and introduce the provider to others in the community;

3. communicate with honesty and openness, face-to-face if possible, following the proper channels of communication in the community;

4. learn from their local contact(s) how to communicate in culturally appropriate ways and have good manners so that community members feel comfortable;

5. respect the community members, the project, and the efforts of the grantee;

6. follow existing guidelines on how to work with Indigenous Peoples such as the [Guidelines for Respecting Cultural Knowledge]() by the Alaska Native Knowledge Network and ['Walk Softly and Listen Carefully': Building Research Relationships with Tribal Communities]() by the NCAI Policy Research Center;

7. exchange knowledge with grantees, taking the time to both learn from them and share resources they can use; and

8. give back to the community by sharing data and disseminating findings that can help grantees.

For more information on these steps, see [Building Relationships in the Arctic: Indigenous Communities and Scientists](#), written by Child Trends researcher Dr. Heather Sauyaq Jean Gordon.

TA providers should also review and consider ways to leverage both Tribal CCDF and state CCDF plans and planning processes. For example, in 2016 The Tribal Early Childhood Research Center's Tribal Child Care and Development Fund Community of Learning conducted [a review of Tribal Grantee CCDF plans](#) to better understand how Tribal CCDF programs operate. As detailed in the report, TA providers can use Tribal CCDF to better understand TA needs and the variety of strategies used in other tribes that may be helpful to try in new communities or to build peer learning opportunities. Similarly, state CCDF plans discuss ways state agencies consult with tribes (section 1.3.1.c), can describe outreach to tribes and coordination goals (1.4.1.a.iii), and describe how tribes and Tribal organizations can access training and professional development opportunities (6.2.2). Beyond CCDF plans, state early childhood strategic planning for ECE may also include goals around supporting Indigenous communities (see [New Mexico's strategic plan, goal 6](#)). TA efforts to support Indigenous communities in coordinating with existing state efforts could increase access to additional funding and services. TA providers should also be aware of and, to the extent possible, build partnerships between programs and organizations that serve Indigenous Peoples living outside of Tribal jurisdictions. With over half of Indigenous Peoples living outside areas where services are provided by Tribes, public services that are offered by states also need to be responsive to Indigenous cultures and values. Because individual states will have different opportunities for coordination and collaboration, TA providers need to be aware of state-level efforts that play a role in the lives of Indigenous children and families and include states where they should be involved in efforts to serve Indigenous children and families.

Leveraging and sharing the multitude of existing resources and opportunities is key to effective TA.

Examples of the wealth of organizations and resources available include:

- [Native Language Community Coordination (NLCC)](#) hosts a resources page with information on language and culture, curriculum development, community engagement and partnerships, program evaluation, and program management, as well as information on COVID-19.

- The federal [Administration for Native Americans (ANA)](#) maintains a resource library that includes many reports and fact sheets.

- [Native Nations Institute](#) at the University of Arizona offers a variety of resources and online courses that may be useful to Indigenous communities.

- The [Tribal Information Exchange](#) of the Capacity Building Center for Tribes provides a wealth of tools, networking opportunities, consultation support, and resources for Tribal organizations providing child welfare services.

- The Child Welfare Research and Evaluation Tribal Workgroup (Children's Bureau) developed [A Roadmap for Collaborative and Effective Evaluation in Tribal Communities](#) to "facilitate discussion, partnerships, planning, policy making, and the development of new methods among

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the stakeholders in Tribal child welfare evaluation" and includes a framework for co-creation and collaboration.

- In addition to many resources on it's website, the Tribal Early Childhood Research Center (TRC) hosts Communities of Learning to lead and guide their work.

- Existing tools, like the Early Care, Early Education, and Home Visiting in American Indian and Alaska Native Communities: Design Options for Assessing Early Childhood Needs (OPRE), can help Tribal communities identify needs and gaps in early care and education services.

- James Bell Associates has developed numerous resources around state-Tribal home visiting coordination, data collection, and evaluation, including this brief on Supporting State-Tribal Local Implementing Agency Collaboration for Improved Data Practices.

- The National Center on Parent, Family, and Community Engagement has developed several resources relevant to Tribal communities, including Implementing Cultural Learning Experiences in AIAN Settings: A Webinar on Making It Work and Comparison: Tribal Child Care and Development Fund and American Indian and Alaska Native Head Start.

- The American Indian and Alaska Native Head Start Family and Child Experiences Survey (AIAN FACES) website houses reports, briefs, and presentations on the study, which collected data on America Indian and Alaska Native children and families.

When considering the ideal structure and capacities of a TA network, we offer the following recommendations (3.3):

The following skills and capacities are essential for TA providers:

- TA must be culturally appropriate and draw on Indigenous understandings of health and well-being, subsistence, the land and medicinal plants, and the role of culture and spirituality in health.

- TA providers must be equipped to understand colonization, federal Indian law and policy, the histories of different Indigenous Nations, their unique cultures, the roles of cultural activities and events, as well as have a robust regional knowledge.

- TA staff must have experience engaging Indigenous Nations and family/parent engagement experience. Ideally, TA staff will also have lived experience in Indigenous settings/communities. If they are not Indigenous themselves, it should be required that providers have taken trainings or classes on federal Indian law and policy, Indigenous Knowledge, and the Indigenous Nations and cultures they will be working with and/or bringing appropriate prior work experience with Tribes and communities.

- The TA team should include a diverse set of skills and ECE experience, bringing a deep understanding of needs and opportunities at the Tribal or community levels, state level, and federal level.

- TA providers need to engage in reflection on their positionality, reflexivity, and Indigenous relationality to help build trusting relationships with Indigenous Nations and communities.

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- TA providers need to be willing to listen and learn from the Indigenous Nations and communities and understand that technical assistance involves taking the time to get to know communities to be able to serve their needs.

- TA providers should respect and privilege Indigenous Knowledge and understand that this Knowledge comes from countless generations and that integrating this Knowledge with Western approaches to ECE is vital instead of trying to push Western ECE approaches onto Indigenous Nations.

In our experience, the following specific TA strategies have been effective:

Start with building strong relationships. Effective TA for Tribal communities relies on a strong, participatory relationship, with TA providers acknowledging and learning from the assets and knowledge of the community. Indigenous knowledge should be privileged in these relationships and be central to TA offered.

Partner with Tribal communities to identify needs. In our experience, the most effective TA strategies support Tribes/partners in first identifying what they need (e.g., universal, targeted, intensive) and understanding their ultimate goals. Once needs are identified, TA providers can work with Tribal communities to develop a plan that addresses the appropriate level of support for that community. There is no one-size-fits-all approach to TA: services meet communities where they are and help them develop a strategic plan for achieving the goals they set.

Provide TA that is asset-based and privileges Indigenous Knowledge. Each Indigenous community brings a unique set of assets and strengths. TA should be tailored to build on those strengths. TA must value each community's Knowledge, culture, and activities – such as the Knowledge carried by Elders, the importance of Indigenous languages, storytelling as a way of teaching, and subsistence practices. In our experience, activities that include engagement through cultural activities and events as a place to talk about programming can be powerful.

Provide TA that recognizes Indigenous culture as a protective factor. Aspects of Indigenous [culture that have been shown to be a protective factor](#) include: enculturation and Indigenous identity formation, traditional activities and games, relationships with the land (including subsistence and traditional foods), social connectedness (including family, intergenerational relationships, Elders, and the community), Native languages, and spirituality and ceremony. It is important to note these factors and how they can be used to raise resilient and healthy Indigenous children.

House resources in a common location so they can be used later. Provide resources that are freely available to a broad audience and easy to access at any time. For example, ACF houses a variety of resources and opportunities in a central location and makes past events available as [recorded trainings](#). This allows partners to fit trainings into their own schedules and find resources as needs arrive.

Provide opportunities for peer learning, Indigenous communities benefit from sharing ideas and problem-solving common challenges with their peers in other locations. Effective TA creates opportunities for communities to visit other sites, build relationships with other communities, and

join with other communities around a common goal. Although most powerful in person, effective peer learning and relationship building can also happen in virtual formats.

Invest in regional TA efforts that can be brought together for a national-level learning. For example, ANA has an Alaska TA center, a center serving Hawaii and the Pacific Islands, an Eastern U.S. center, and a Western U.S. center. This model is very useful, particularly as Alaska and Hawaii and the Pacific Islands have unique needs. There are strong regional opportunities to exchange knowledge across cultures that may share similarities as well as across communities drawing on similar types of grants and TA needs (e.g. due to geography, transportation, and community size). In addition to regional work, having a national effort that engages all the TA centers will support engagement with federal policy and shared issues. A national topic-specific TA center on ECE could be very useful in helping to translate research to practice. The ANA NLCC topic-based TA Native language center is an example of an organization that has both a regional and a topic-based center. Having a topic-based center allows them to feed information to all regions, who can then adapt the information to best meet the needs of those in their specific region.

The needs are different in different types of communities, and TA efforts must be tailored to and responsive to those needs (3.5)

Indigenous Nations and communities are diverse and, due to this diversity, TA efforts must be tailored to and responsive to each community's needs. For example, geography is widely varied across communities, and some Indigenous communities are spread out across a large land base like the Navajo Nation, lacking consistent intranet infrastructure, running water, and sewage. Other communities are like those in rural Alaska, are not accessible by road and also lack running water, sewage systems, and good internet connectivity. Still others, like Hawaii, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands are island peoples, who often live in rural or hard-to-reach areas with high costs of food and other goods that must be delivered, such as building materials. Geography alone creates different community needs around infrastructure, internet, transportation, qualified workers, etc. In addition to living in rural areas, there are many Indigenous people living in urban areas. These populations have different needs from reservation, rural, and remote communities. Many urban Indigenous People are seeking to connect with their cultures and languages. It may be difficult for urban ECE providers to find people qualified to teach Indigenous culture and languages in their classrooms due to cultural experts living on the reservation or in rural areas.

As TA providers, it is key to listen to each community to identify their needs. In addition to geography, Indigenous Peoples have diverse histories with colonization, slavery, land grabbing, federal policies, state policies, and contemporary social, political, economic, and ecological situations. Communities have different experiences that may have been traumatic, requiring certain practices to not retraumatize the community. Some communities have had their land taken and do not have rights to subsist on the land they lived on for millennia prior to colonization. Communities also differ in size, which may play a role in their capacity to implement ECE centers, programing, and hiring and retaining staff. Further, Indigenous Peoples have different languages, cultures, and ways of life. All these factors are very important to note and pay attention to when working with communities and building relationships.

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Because communities have different needs and priorities, TA providers need to not only be aware of these differences but also must be responsive to differing needs and priorities and be able to serve the vast diversity in the 574 federally recognized Tribes, numerous state-recognized Tribes, and many other Indigenous communities. Recognizing the different geographies, capacities, infrastructures, and social, political, economic, and ecological situations of these Peoples and Nations is very important when making decisions about how to best serve a community. Remembering that climate change, resource extraction, and waste also disproportionately affect many Indigenous communities should remind providers of the vulnerability and resilience of Indigenous Tribal Nations.

This endeavor requires TA expertise on a vast and wide variety of issues and aspects of life to serve Indigenous communities. Such diversity of needs requires a diversity of services on which each community can draw upon and TA expertise in navigating and supporting the communities. For example, a Tribal Nation managing a large program/service only available to Tribal members is very different from a setting with Tribal and non-Tribal members in a rural area, which in turn differs from a setting with Tribal and non-Tribal members in an urban area.

Thank you again for this opportunity to comment on *Technical Assistance Needs and Priorities on Implementation and Coordination of Early Childhood Development Programs in American Indian and Alaska Native Communitie*s. If you have any questions or would like more information, please contact Elizabeth Jordan at Child Trends (ejordan@childtrends.org; 240-719-8199).

Sincerely,

/s/

Carol Emig
President

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