

6. Correspondence – ACF-OHS-IM-24-03 Affirming the Use of Indigenous Knowledge to Meet Curricula and Assessment Requirements in American Indian and Alaska Native Head Start Programs

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-OHS-IM-24-03	2. Issuance Date: 09/17/2024
	3. Originating Office: Office of Head Start	
	4. Key Words: American Indian and Alaska Native; AIAN; Curriculum; Assessment; Indigenous Knowledge; Cultural Practices; Culture and Language	

INFORMATION MEMORANDUM

TO: American Indian and Alaska Native Head Start Agencies

SUBJECT: Affirming the Use of Indigenous Knowledge to Meet Curricula and Assessment Requirements in American Indian and Alaska Native Head Start Programs

INFORMATION:

The Administration for Children and Families (ACF), Office of Head Start (OHS) partners with Tribes and Tribal organizations to administer the Head Start program for children ages birth to 5 and their families. Through nation-to-nation relationships, OHS engages in open discussions with Tribes to understand how to support their Head Start programs. Through this nation-to-nation dialogue, including consultations, listening sessions, and ACF's Tribal Advisory Committee (TAC), Tribal leaders have emphasized the importance of Indigenous Knowledge, language, and culture in designing Head Start programs.

A central purpose of American Indian and Alaska Native (AIAN) Head Start programs is to enhance opportunities for young children and their families to engage in Native cultural activities, and to expand opportunities for exposure to Native languages. Native language and culture cannot be separated from Indigenous Knowledge.

In December 2022, the White House Office of Science and Technology Policy (OSTP) with the White House Council on Environmental Quality (CEQ) released [guidance](#) to federal agencies on incorporating [Indigenous Knowledge](#) into federal research, policy, and decision making. The inclusion of Indigenous Knowledge in Head Start programming, including curricula and developmental assessments, is vital to Tribal children, families, and communities. OHS stands in reverence for Tribes as they determine how language, culture, and traditional practices are embedded in AIAN programs. Tribes must determine the curriculum and assessments that will meet the priorities of their communities.

This Information Memorandum identifies how AIAN Head Start programs can meet the requirements of the Head Start Program Performance Standards (the Performance Standards)

related to curricula and assessment in ways that center Indigenous Knowledge and Tribal sovereignty.

Centering Native Language, Culture, and Traditions in AIAN Head Start Programs

AIAN Head Start programs affirm that [positive identity development grounded in Native culture and language](#) can serve as a foundation to health and well-being in early childhood and beyond and programs play a key role in supporting Tribal communities' goals for childhood development.

Centering Native language, culture, and traditions in Tribal education programs is critically important to children's development and long-term success. Tribal leaders have emphasized that grounding children in their culture, language, traditional practices, and land-based learning supports their sense of self and socio-emotional development. Tribal leaders, teachers, and program staff have shared with ACF that passing down cultural inheritance to young children requires time spent outside of the classroom and the support and expertise of elders, cultural teachers, and land specialists. Thus, many Tribes view their Head Start programs as a key strategy in transmitting cultural knowledge and preserving and revitalizing the Native language during the formative years of a child's life.

Tribal leaders have shared with ACF that historical actions taken by the U.S. Government, especially [Indian boarding schools](#), disrupted the intergenerational transmission of language, culture, and traditions. ACF has also heard that the continued imposition of western educational models impedes Tribes' ability to immerse young children in land-based and Native language-based learning that is essential to cultural healing and continuity in Tribal communities. Indigenous practitioners emphasize that engagement in cultural practices and traditions in Tribal communities serves as protective factors and healing practices — for young children and adults alike — against the impacts of current manifestations of historical trauma caused by colonization and past harmful U.S. policies. ACF seeks to support Tribes by highlighting flexibilities around curricula and child assessments that support Native language, culture, and healing.

Applying Indigenous Knowledge to Meet Head Start Curricula and Child Assessment Requirements

The Performance Standards outline requirements for using curricula and child assessments in Head Start programs and include flexibility for Native language preservation and revitalization efforts.

Under [45 CFR §1302.36](#), AIAN programs may integrate efforts to preserve, revitalize, restore or maintain the Tribal language for children into program services. Such language preservation and revitalization efforts may include full immersion in the Native language for most hours of planned class operations. Per this section, exposure to English in the Head Start program is not required if the child's home language is English and if the program wishes to fully use the Native language.

Specifically, to satisfy the curricula requirements under [45 CFR §1302.32](#), the Performance Standards require that center-based and family child care programs implement developmentally appropriate and research-based curricula that are based in scientifically valid research with a standardized training procedure. This guidance affirms that by applying Indigenous Knowledge to developing, adapting, and implementing curricula, AIAN Head Start recipients meet the requirement that curricula are research-based and scientifically valid.

While the regulations do not mandate a particular curriculum, the Performance Standards require that it be sufficiently content-rich to promote measurable progress toward development and learning goals outlined in the [Head Start Early Learning Outcomes Framework \(ELOF\): Ages Birth to Five](#). Tribes have the discretion to determine that the best way to make progress toward ELOF domains is by centering culture and language. The ELOF is designed to allow Tribal early childhood programs to use their community's traditional cultural skills, values, beliefs, language, and lifeways to address the domains or state and Tribal early learning guidelines.

OHS encourages AIAN programs to explore [Making It Work](#) materials for guidance and inspiration. The [pilot program examples](#) showcase seven AIAN programs — Cherokee Nation Early Childhood Unit Head Start; Grand Traverse Band of Ottawa and Chippewa Indians Head Start; Inter-Tribal Council of Michigan, Inc., Head Start, Pokagon Band of Potawatomi; Sault Tribe of Chippewa Indians Head Start and Early Head Start; Rincon Band of Luiseño Indians Head Start; Sisseton Wahpeton Oyate of the Lake Traverse Reservation Head Start; and Walatowa Head Start, Pueblo of Jemez — who effectively:

- Implement cultural learning experiences in early childhood settings
- Connect Tribe-specific traditional cultural skills, values, beliefs, and lifeways to school readiness goals
- Create cultural lessons that engage families and communities
- Document children's progress
- Match children's interests and needs to create individualized lesson plans for each child and small groups

The Performance Standards require curricula to have an organized scope and sequence that include plans and materials for developmentally appropriate learning experiences. Programs may design their own curricula or make significant adaptations to curricula with support from an external early education curriculum or content area expert. AIAN grant recipients may use an individual or group that the Tribe has determined to hold subject matter expertise in Indigenous Knowledge, language, or culture to satisfy the curricula adaptation requirements in 45 CFR § 1302.32(b) for an external early childhood education curriculum or content area expert. While this person or group cannot be a regular staff member of the Head Start program, they may be internal to the Tribal community and could serve as an Indigenous language expert, cultural teacher, or Tribal elder.

This guidance affirms that Tribes should determine which assessment instruments are developmentally, culturally, and linguistically appropriate for children in their communities, as well as the training and qualifications for individuals conducting assessments.

To satisfy the requirements under [45 CFR §1302.33\(b\)](#), AIAN Head Start programs must conduct standardized and structured assessments for each child that provide ongoing information to evaluate the child's developmental level and progress in outcomes aligned to the goals described in the ELOF. AIAN Head Start agencies may elect to conduct observation-based or direct child assessments and can determine how to operationalize progress toward the goals in the ELOF. Such assessments must result in information that the Tribe or Tribal organization determines is useful for teachers, home visitors, and parents and be conducted with sufficient frequency to allow for individualization within the program year. The Making It Work materials can help AIAN Head Start agencies determine how their assessment tool aligns with curricula that is rich in cultural and language activities.

AIAN Head Start agencies must regularly use relevant findings from the child assessments, along with informal teacher observations and additional information from family and staff, to:

- Determine a child's strengths and needs
- Inform and adjust strategies to better support individualized learning and improve teaching practices in center-based and family child care settings
- Improve home visiting strategies in home-based models

Tribes and Tribal organizations administering the Head Start program have considerable flexibility in determining how to use the information from child assessments to support teaching and learning. This includes using Indigenous knowledge to determine how best to support the child. As a result of the information gathered — if warranted and with direct guidance from a mental health or child development professional and a family's consent — a program must refer the child to the local agency responsible for implementing the Individuals with Disabilities Education Act (IDEA) for a formal evaluation to assess eligibility for services under IDEA. As described in the Performance Standards at [45 CFR §1302.45\(a\)\(4\)\(i\)](#), mental health providers may include traditional practitioners recognized by the Tribe.

Assessments must be valid and reliable for the population and purpose for which they will be used, including by being conducted by personnel that the Tribe deems qualified and trained (45 CFR §1302.33(c)). The AIAN Head Start program must determine that the assessment is age, developmentally, culturally, and linguistically appropriate, and appropriate for children with disabilities, as needed. If a program serves a child who speaks a language other than English at home, it is required to use qualified bilingual staff, contractors, or consultants who know and understand the child's language and culture and have sufficient skill level in the home language to accurately administer the assessment and record and understand the child's responses, interactions, and communications.

Protecting Indigenous Knowledge in Tribal Communities

As stated in the OSTP guidance, Indigenous Knowledge is unique to a Tribe or Native community and might be recorded or maintained in a variety of forms, some of which are not accessible to or understood by individuals outside of the Tribal community.

In keeping with this guidance, OHS acknowledges that Tribal leadership and program administrators will be solely responsible for confirming that curricula are scientifically valid based on Indigenous Knowledge, and that age, developmentally, culturally, and linguistically appropriate assessments are conducted by qualified and trained personnel. During monitoring, when determining whether an AIAN Head Start grant recipient has complied with curricula and assessment requirements, OHS will rely on statements from Tribal leaders, elders, governing boards, and Policy Councils.

Tribes have different conventions and traditions related to passing down Indigenous Knowledge, culture, and language. This includes norms related to writing down language or sharing with individuals external to the community. Thus, OHS will not require Tribes to share their curriculum, assessments, or evaluations if the Tribe self-certifies that their curriculum and assessment tools are research-based and scientifically valid according to their Tribal definitions of these terms.

Funding to Support Indigenous Knowledge in AIAN Programs

OHS knows that centering Native language, culture, and traditions in AIAN Head Start programs has financial implications and encourages programs to consider various funding mechanisms for support. Recipients can use their base grant funds to support their efforts in this area, such as paying wages for a third person in the classroom who is a fluent speaker or a language teacher but does not have to meet the training and educational requirements for teachers or assistant teachers.

AIAN Head Start recipients can consider the following options:

- Submit a **budget revision or Change in Scope application** to update current funding to better align with program priorities.
- Apply to use **quality improvement funds** for activities consistent with [Sec. 640\(a\)\(5\)\(A\)\(i–iii\)](#) of the Head Start Act. For example, AIAN programs can use these funds to:
 - Employ qualified staff to promote the language skills and literacy growth of children
 - Develop or support staff training on adapting curricula or effectively using assessment tools
 - Ensure physical environments are conducive to effective program services that center Native language, culture, and traditions
- Use **training and technical assistance (TTA) funds** in accordance with plans to address needs that are specific to their local program. Examples of TTA include:
 - Providing language teaching training
 - Improving learning environments
 - Developing curricula or using an external evaluator
 - Helping parents support their child's literacy skills at home
- Learn about the [Tribal Colleges and Universities Head Start \(TCU-HS\) Partnership Program](#). Per [Sec. 648\(g\)](#) of the Head Start Act, it is intended to support Tribal colleges and universities to implement efforts to strengthen career pathways and degree attainment

for Head Start staff, in partnership with AIAN Head Start agencies. TCU-HS funds help to address the employment needs of Tribal Head Start programs while being responsive to the cultures and languages of Native Tribes through a “growing our own” approach.

- Apply for **one-time program improvement funds** if needs cannot be supported by the agency’s budget or other resources. One-time funds may be used to support non-recurring expenses such as developing, purchasing, or adapting a curriculum, or commissioning cultural artifacts or materials for lessons. These requests are prioritized and approved based on funding availability. Grant recipients should reach out to their program specialist to discuss a one-time funding request.

In addition to Head Start funds, OHS reminds AIAN programs of other federal funding opportunities to consider. For example, these three programs are facilitated by the [Administration for Native Americans](#):

- **Native Language Preservation and Maintenance (P&M) Program:** Provides funding for projects to support assessments of the Native languages in an established community, as well as the planning, designing, restoration, and implementing of Native language curriculum and education projects to support a community's language preservation goals.
- **The Esther Martinez Immersion (EMI) Program:** Formerly called the Esther Martinez Initiative, supports the development of self-determining, healthy, culturally and linguistically vibrant, and self-sufficient Native American communities. Grant funding is awarded in accordance with the Esther Martinez Native American Languages Preservation Act of 2006. The initiative provides funding to support up to five-year projects being implemented by Native American Language Nests, Survival Schools that provide at least 500 hours of immersion instruction in a Native language.
- **Social and Economic Development Strategies (SEDS) Program** supports community-based projects that promote social and economic well-being and self-sufficiency for American Indians, Alaska Natives, Native Hawaiians, and Native American Pacific Islanders. SEDS projects are diverse, and the funding is flexible to support early childhood development, Native arts and culture, families and parents, youth development, and more.

Relevant Resources

[Making It Work: Implementing Cultural Learning Experiences in American Indian and Alaska Native Early Learning Settings for Children Ages Birth to 5](#)

These materials help AIAN programs connect Tribe-specific traditional cultural skills, values, beliefs, and lifeways to school readiness goals; create cultural lessons that engage families and communities; document children's progress using the program's ongoing child assessment process; and match children's interests and needs to create individualized lesson plans for each child and small groups. Making It Work can be used with any curriculum.

[Tribal Language Revitalization Report](#)

This report — based on visits to programs and discussions with Tribal leaders, program staff, and parents — provides information about efforts to revitalize Tribal languages in Head Start programs. It focuses on preparing and developing a revitalization strategy, implementing

language learning for children and adult learners, and building community support. Program examples and teaching tips are provided, along with a list of resources.

[Implementing a Curriculum with Fidelity: Questions and Answers](#)

This resource addresses common questions about ways to implement a curriculum with fidelity while being responsive to the cultural and linguistic backgrounds of children and families.

[ACF-IM-HS-15-02 Native Language Preservation, Revitalization, Restoration, and Maintenance in Head Start and Early Head Start Programs](#)

OHS's support for teaching Tribal languages to children in AIAN Head Start programs is clarified and affirmed in this Information Memorandum.

[Curriculum Consumer Report](#)

This tool provides review summaries and ratings of comprehensive infant and toddler, preschool, and home-based curricula to help programs assess relevance to the Performance Standards. The curricula listed in the report have been pre-screened for relevance but are not endorsed by OHS.

[Tribal Research Center on Early Childhood Development and Systems \(TRC\)](#)

The TRC provides leadership and collaboration to promote excellence in community-based research and evaluation of ACF early childhood and family economic well-being initiatives that serve Tribal communities. Settings include Tribal home visiting programs, early care and education center-based programs, home-based and family child care providers, Head Start Preschool and Early Head Start programs, and Temporary Assistance for Needy Families programs.

[Indigenous Early Learning Collaborative \(IELC\)](#)

A national institute, IELC serves an intellectual home for Indigenous early learning and development communities of practice. It provides an opportunity to engage, learn, and access material and resources to inform locally designed community-based inquiry, programs, co-learning and evaluation, and strategies for sustaining high-quality early learning opportunities for Native children and families.

[Native American Language Resource Center \(NALRC\)](#)

NALRC is a virtual hub from the Office of Elementary and Secondary Education that provides access to a wide variety of Native language services and products. It features comprehensive guidance, resources, and best practices for early childhood providers, K–12 schools, institutions of higher education, Tribal agencies, and their authorizing agencies.

OHS looks forward to continued partnership with Tribes to promote Indigenous Knowledge, culture, and language in Head Start programs. Thank you for your work on behalf of Head Start children and families in Tribal nations and communities.

Sincerely,

/Khari M. Garvin/

Khari M. Garvin
Director
Office of Head Start