

# REQUEST FOR INFORMATION: Meeting the Child Care Needs in Tribal Nations

**Docket Number: ACF-2023-0004**  
**January 2, 2024**

---

**Submitted to:**

Office of Child Care, Administration for  
Children and Families, U.S. Department of  
Health and Human Services  
Attention: Megan Campbell  
[OCCTribal@acf.hhs.gov](mailto:OCCTribal@acf.hhs.gov)

**Submitted by:**

Mathematica  
1100 First Street, NE, 12th Floor  
Washington, DC 20002-4221  
Phone: (202) 484-9220  
Fax: (202) 863-1763

**This page has been left blank for double-sided copying.**

## **REQUEST FOR INFORMATION: Meeting the Child Care Needs in Tribal Nations**

Docket Number: ACF-2023-0004

January 2, 2024

### **Submitted to:**

Office of Child Care, Administration for Children and Families, U.S. Department of Health and Human Services

Attention: Megan Campbell

OCCTribal@acf.hhs.gov

### **Submitted by:**

Mathematica

1100 First Street, NE, 12th Floor

Washington, DC 20002-4221

Phone: (202) 484-9220

Fax: (202) 863-1763

**This page has been left blank for double-sided copying.**

## Contents

CCDF Administration .....	1
E. Early Childhood and Related Systems Coordination .....	1
I. Reporting Requirements .....	3
J. Quality Activities in Tribal Child Care.....	3
K. Tribal and State Coordination of CCDF Programs .....	4
Improving Families’ Access to Child Care.....	4
L. Consumer Education .....	4
M. Eligibility .....	6
Increasing Child Care Supply in Tribal Communities.....	6
N. Early Childhood Workforce .....	6
O. Eligible Child Care Providers .....	7

**This page has been left blank for double-sided copying.**

## Comment on Request for Information on Meeting the Child Care Needs in Tribal Nations

The Child Care and Development Fund (CCDF) sponsored by the Office of Child Care (OCC) is a critical program that aims to increase the capacity of Tribal child care and early childhood development programs. It also strives to support long-term, high-quality care delivery for Native American children and their families. CCDF presents an opportunity for ongoing collaboration among OCC, Tribal Lead Agencies, early childhood development providers, and Tribal communities to promote robust and culturally responsive program models that integrate Indigenous knowledge, practices, and languages across various early childhood programs.

Mathematica’s response to this request for information provides recommendations to strengthen CCDF by making the program more collaborative, tailored, and accessible for Tribal communities. For more than 50 years, Mathematica has worked with federal agencies, grant recipients, foundations, community organizations, and other community entities—including Tribal Lead Agencies, families, and early child care practitioners—to evaluate the effectiveness of existing programs in partnership with Tribal, state, and local agencies. Our response was prepared by Mathematica staff who are Tribal citizens and draws on our experience providing training and technical assistance for Tribal child care programs, promoting Tribal sovereignty in federal programs, coordinating early childhood programs, and promoting innovation in grant operations to provide insights and recommendations for changes to CCDF that uphold Tribal sovereignty and center the unique ideas, voices, and needs of Tribal communities.

### CCDF Administration

#### E. Early Childhood and Related Systems Coordination

Multifaceted barriers interfere with Tribal Lead Agencies coordinating CCDF with other early childhood programs, such as Head Start, preschool funds offered through state or local resources, and home visiting, as well as with other related programs. These barriers impede the seamless integration of funding streams to achieve culturally appropriate and high-quality early childhood settings. Based on our work with Tribal providers and supportive agencies, we have identified several specific barriers and challenges to integration:

- **Fragmented funding streams.** Different programmatic funding streams often operate under distinct guidelines, regulations, and reporting requirements. This fragmentation creates administrative complexities that hinder coordinating and aligning resources seamlessly.
- **Differing program priorities and objectives.** Each early childhood program has unique priorities, goals, and evaluation criteria, making it challenging to align these objectives with Tribal program goals and cultural values.
- **Limited flexibility in using funds.** Restrictions on fund usage, such as earmarked allocations or rigid spending guidelines, can limit the adaptability of funds to meet specific Tribal needs or integrate cultural elements into early childhood settings.
- **Data-sharing and reporting challenges.** Inconsistent data collection methods and reporting requirements across programs make it difficult to synchronize data-sharing efforts and ensure comprehensive tracking of outcomes and impacts.

- **Resource and capacity constraints.** Limited resources and capacity within Tribal Lead Agencies to navigate the complexities of blending, braiding, and layering funds across multiple federal programs pose significant challenges.
- **Lack of collaborative frameworks.** The absence of formalized mechanisms for inter-agency collaboration and coordination can hinder effective communication, joint planning, and resource pooling among different programs.

To address these barriers and enhance the coordination of funding streams for culturally appropriate and high-quality early childhood settings, we recommend that OCC focus on iterative solutions that prioritize capacity-building of Tribal Lead Agencies and collaborative partnerships in the following ways:

- Provide **targeted capacity-building support and technical assistance** to Tribal Lead Agencies to navigate administrative complexities, manage funds effectively, and promote inter-agency collaboration. Tribal agency and community feedback on frequently encountered challenges should inform targeted capacity-building support and technical assistance. Topics for targeted technical assistance can include, for example, navigating the braiding of CCDF and Temporary Assistance for Needy Families funding or integrating CCDF funding for the training and education for child care workers with employment case management efforts.
- Encourage the development of **culturally responsive program models** that prioritize the integration of Indigenous knowledge systems, languages, and cultural practices into the curriculum. Programs that uplift Indigenous pedagogies promote storytelling, traditional arts, ceremonies, language immersion, teachings from Elders or community knowledge keepers, land-based learning, and fostering a strong sense of identity and belonging among children.
- **Invest in systems and protocols that facilitate comprehensive data integration and sharing across programs**, ensuring a unified approach to tracking outcomes and impacts. Having to report identical or similar data to multiple federal agencies leads to duplication of efforts for Tribal early childhood programs, consuming valuable time and resources. Programs often operate with limited staff and resources. The additional administrative burden of reporting the same data to multiple entities can strain the capacity of these programs, diverting their focus from direct services for children and families.
- **Foster collaborative partnerships and establish formalized frameworks for communication and joint planning** among federal agencies, Tribal entities, and community partners to enhance coordination efforts and meet specific, evolving Tribal needs. Creating formalized frameworks around reported challenges or technical assistance focuses could simultaneously advance OCC's capacity-building and collaborative goals for CCDF.

Operational support improvements should be responsive to emerging barriers experienced by Tribal Lead Agencies and informed by ongoing communication and collaborative partnerships with Tribal communities. Clear guidance and targeted support should promote braiding federal funding streams and inter-agency efforts, rather than fragmented requirements inhibiting such efforts. Further, comprehensive data integration support and technical assistance can alleviate the strain that CCDF requirements pose on capacity and enable Tribal Lead Agencies to focus on promoting culturally responsive models across early childhood programs.



## I. Reporting Requirements

**For Tribal communities in the United States, data sovereignty holds immense significance as it relates to their inherent right to control and manage their data, information, and knowledge.** The current reporting requirements might not align with Tribal data sovereignty principles, which emphasize the right of Tribes to govern and control their data. The forms might not sufficiently respect Tribal autonomy in determining data collection, management, and sharing processes. In the realm of government reporting requirements such as the Administration for Children and Families (ACF)-700 and ACF-696T forms, challenges related to data sovereignty arise when these standardized reporting mechanisms fail to align with Tribal principles, practices, and preferences regarding data governance. The requirements can impose rigid structures that do not accommodate Tribal autonomy, leading to potential misrepresentation or insufficient collection of Tribal-specific information.

Efforts to address data sovereignty concerns should involve fostering partnerships based on mutual respect between federal agencies and Tribal entities. We suggest three approaches:

- Engaging in meaningful consultation and collaboration with Tribal Nations in developing and implementing data-related policies and reporting requirements
- Recognizing and accommodating diverse Tribal perspectives and approaches to data governance and management
- Supporting capacity-building initiatives that empower Tribal communities to develop their data infrastructure and governance mechanisms

## J. Quality Activities in Tribal Child Care

There are several drivers of child care quality in Tribal communities, along with associated challenges. We have identified the following challenges:

- **Cultural disconnection.** The imposition of non-Indigenous practices or lack of culturally responsive approaches in child care settings can lead to cultural disconnection, which can undermine the cultural identity and well-being of Indigenous children.
- **Geographic location.** The remote or rural locations of many Tribal communities mean the communities often face challenges in accessing quality child care due to limited availability, transportation issues, securing adequate infrastructure, and qualified staff.
- **Limited collaboration and coordination.** Fragmented services and a lack of coordination between Tribal governments, federal agencies, and state lead agencies can hinder efforts to develop comprehensive and sustainable child care solutions.

Based on these challenges, we recommend enhancing OCC's existing support of the drivers of quality child care already existing within communities:

- **Flexibility to tailor services in culturally responsive way is a primary driver of child care quality.** Tribes have diverse and rich cultural beliefs that make the Tribes unique. Incorporating Indigenous values, traditions, and languages within child care settings is crucial for maintaining cultural continuity and providing a culturally sensitive environment for children.

- **Continuity of care and stability enhance child care quality.** Encouraging stable relationships between caregivers and children; minimizing turnover; and ensuring consistent, nurturing environments are essential for optimal child development.
- **Professional development and training.** Investing in training programs that emphasize cultural competency and understanding of the specific needs of Indigenous children is important for child care quality.
- **Community involvement and family engagement are primary sources of child care quality.** Strong community involvement, including collaboration with Tribal Elders, leaders, and families, plays a pivotal role in ensuring that child care programs align with the community’s needs and values. Involving families in children’s care and education and providing support services that address their needs and challenges contribute to a holistic approach to child care quality.

#### **K. Tribal and State Coordination of CCDF Programs**

How state agencies administer CCDF requirements can significantly affect how Tribal Lead Agencies manage their Tribal CCDF programs and meet the needs of Native children and families. To support Tribal child care, we recommend meaningful, regular, and robust consultation with Tribal officials and elevating the focus on culturally responsive services for Native children.

**Although federal mandates require states to consult and collaborate with Tribal governments, the effectiveness and depth of this collaboration can vary.** Not proactively engaging in meaningful consultation with Tribal officials can hinder the alignment of state CCDF requirements with the cultural context and needs of Native communities. Guidance and quality assurance checks from the federal level to ensure meaningful and robust consultation occurs are needed.

**More than 70 percent of Native children live outside of their Tribal Nation’s service area and potentially receive child care from providers accepting CCDF support from the state. In these cases, Native children might not receive culturally responsive services.** Ensuring culturally responsive services for Native children in all child care centers funded by CCDF, not just those located in Tribal service areas, is crucial for children’s holistic development. Developing and enforcing cultural sensitivity guidelines that specifically outline the requirements for culturally responsive care—and incorporating culturally relevant materials, practices, and activities into the curriculum—could be a helpful first step. Similarly, encouraging active involvement from Native communities in developing and evaluating child care programs will ensure their input can significantly shape services to better meet the needs of Native children.

### **Improving Families’ Access to Child Care**

#### **L. Consumer Education**

Requirements related to consumer education information for programs at Tribal Lead Agencies are critical elements that ensure families and the general public have adequate information to make informed decisions. However, in their current form these requirements pose several logistical and programmatic challenges to delivering effective services. These requirements might not align with culturally relevant contexts or communication preferences of Tribal communities, and current

processes exacerbate capacity resource constraints at Tribal Lead Agencies. For example, consumer education information requirements for Tribal Lead Agencies include the following:

- Tribal Lead Agencies can **face resource constraints**, such as limited staffing or funding, which **can impede their capacity to effectively develop and disseminate comprehensive consumer education materials to families**.
- Consumer education materials mandated by federal **requirements might not always align with the cultural context, languages, or learning styles of Tribal communities**, making it challenging to develop information that resonates with these populations.
- **The volume or complexity of required information can overwhelm families**, potentially leading to difficulties in understanding the details of Tribal CCDF programs and eligible providers. In addition, ensuring the accessibility of information in terms of language, literacy levels, and formats can pose challenges.
- **Identifying the most appropriate and effective means of communicating essential information about Tribal CCDF programs and eligible providers to families and the general public can be challenging**. It requires understanding preferred communication channels within Tribal communities (use of digital tools, like Facebook, Zoom, or group texting) and ensuring information reaches all segments of the population. Achieving this level of tailored dissemination planning is difficult given the vastly varying contexts of Tribal Lead Agencies.

To address these challenges and align the consumer education information requirements with CCDF's goals, we recommend engaging communities as early as possible in the development of consumer education resources that center accessibility and provide tailored information. These resources should use community networks to disseminate resources. Potential solutions include the following:

- **Developing streamlined and culturally relevant consumer education materials** that succinctly outline key aspects of Tribal CCDF programs and eligible providers. These materials should consider the specific needs, languages, and cultural values of Tribal communities.
- **Providing information in multiple formats (written, visual, and oral) and languages** can enhance accessibility and ensure families with diverse literacy levels and communication preferences can access and understand the information.
- **Involving families and community partners in developing consumer education resources** can ensure the materials are relevant, understandable, and address the actual needs and concerns of families participating in Tribally administered child care subsidy programs.
- **Drawing on existing community networks**—such as Tribal councils, cultural centers, or community events—as effective channels for disseminating consumer education information will help to reach a broader audience.

By focusing on these strategies, Tribal Lead Agencies can enhance the transparency of their programs, promote informed decision-making among families, and foster greater engagement and participation within their communities. Seeking direct feedback from families participating in Tribally administered child care subsidy programs about existing consumer education resources can also provide valuable insights into the resources' effectiveness in promoting transparency and supporting informed parental choices.

## M. Eligibility

Several changes could enhance eligibility requirements to improve and expand access to treatment for Tribal Nations and communities. Based on our work with Tribal providers and supportive agencies, we recommend the following:

- **Enhance eligibility criteria to foster better coordination between Tribal CCDF programs and other early care and education initiatives.** Streamlining eligibility requirements across different programs might facilitate easier integration and coordination. Some examples might include automatic enrollment for programs that qualify and the ability to submit eligibility requirements from organizations that already have information readily available to reduce burden.
- **Adjust eligibility requirements to improve access and expand opportunities for Tribal Nations and communities to access child care and early learning services.** This might involve reevaluating income thresholds, geographic considerations, and family needs specific to Tribal communities.
- **Recognize and respect Tribal sovereignty to shape eligibility requirements.** Providing Tribal Lead Agencies greater authority in determining their own eligibility criteria within the framework of federal guidelines can better empower Tribal Nations to design programs that best serve their communities. Involving Tribal communities in the review and revision of eligibility criteria is also essential. Seeking input from Tribal leaders, Elders, families, and affected groups ensures that any changes reflect the needs and aspirations of the communities being served.

## Increasing Child Care Supply in Tribal Communities

### N. Early Childhood Workforce

ACF's mission is to advance an early childhood sector that meets the developmental needs of, and creates equitable opportunities for, children and families. This includes supporting systems that attract, prepare, support, and retain a qualified and diverse workforce. President Biden's Executive Order on Increasing Access to High-Quality Care and Supporting Caregivers also calls for increasing wages and benefits for staff, increasing provider payment rates, and improved access to mental health supports for the workforce. CCDF provides significant flexibility for Tribal Lead Agencies to prioritize CCDF funds for the workforce. Many Tribal Lead Agencies have informed OCC about frequent internal challenges to increasing CCDF Tribally Operated Center teacher, director, and staff wages and/or in retaining qualified CCDF staff.

**N2. Qualifications.** Challenges in recruiting and retaining qualified staff are prevalent, often due to limited resources, lower wages, and lack of career advancement opportunities within Tribal CCDF programs. High turnover rates within the child care workforce, especially in remote or rural Tribal communities, pose significant challenges in maintaining consistent care and establishing trusting relationships with children and families.

**Some CCDF requirements might not fully consider the unique circumstances of Tribal Lead Agencies, leading to challenges in meeting specific workforce qualifications.** Requirements that do not account for cultural competencies or recognize untraditional education pathways hinder education, training, recruitment, and retention efforts, and should be revised or removed. An effective workforce in Tribal communities must understand and respect cultural traditions,

languages, and values. Qualifications should include training on cultural sensitivity and engagement with Tribal communities.

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

### **O. Eligible Child Care Providers**

When reviewing current requirements on eligible providers, we recommend that OCC consider impacts on Tribal sovereignty and the need for culturally sensitive definitions and criteria. Rigid requirements can restrict Tribal autonomy and culturally significant caregiving roles within Tribal communities. Current eligible provider requirements pose several specific barriers:

- **The definition of eligible providers might be limited** and might not fully align with the unique family structures and caregiving arrangements within Tribal communities. This can limit the inclusion of culturally relevant caregiving models or traditional child care practices that are prevalent in Tribal settings.
- While allowing for relative providers in the context of family relationships, **certain limitations in the definition** (for example, living in separate residences) **might not accurately reflect the communal living arrangements and caregiving structures commonly seen in Tribal communities.**
- The requirements, if not flexible enough, might undermine Tribal sovereignty by imposing federal definitions and limitations on provider eligibility. This can **restrict Tribal autonomy in recognizing and defining caregiving roles within their communities.**

Changes to the eligible provider requirements should uphold Tribal sovereignty through flexible criteria and increased autonomy of Tribal Lead Agencies to identify eligible providers according to their specific cultural and community values. Imposing strict federal definitions through eligible provider requirements can inhibit opportunities to meaningfully engage Tribal communities in shaping criteria that reflect their specific priorities and values. As criteria become increasingly community-driven and tailored, the eligible provider model becomes more effective. To better support Tribal CCDF programs and uphold Tribal sovereignty, we recommend that OCC pursue the following changes to the eligible provider requirements:

- **Increase flexibility in the definition of eligible providers** to accommodate traditional caregiving structures and acknowledge the cultural nuances within Tribal communities.
- **Expand the definition to acknowledge and include communal caregiving practices,** which are prevalent and culturally significant in many Tribal communities.

- **Grant Tribal Lead Agencies more authority to define and determine eligible providers** based on their unique cultural values, family structures, and community needs without stringent federal limitations.
- **Engage Tribal communities in the process of shaping provider eligibility criteria,** ensuring that the criteria reflect community values, traditions, and family structures.

The proposed changes can empower Tribal Lead Agencies to implement more culturally responsive and community-driven child care programs that align with Tribal values; promote self-determination; and honor the rich history, ancestral wisdom, and diversity of caregiving practices within Tribal communities. Ultimately, this approach can better support the goals of Tribal CCDF programs while respecting and upholding Tribal sovereignty.

---

**Mathematica Inc.**

Our employee-owners work nationwide and around the world.

Find us at [mathematica.org](https://mathematica.org) and [edi-global.com](https://edi-global.com).



Mathematica, Progress Together, and the “spotlight M” logo are registered trademarks of Mathematica Inc.