

REPORT TO CONGRESS

ON AMERICAN INDIAN AND ALASKA NATIVE HEAD START FACILITIES



2020



ADMINISTRATION FOR
CHILDREN & FAMILIES

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Executive Summary

Congressional Reporting Requirement

This report is provided in response to the mandate by Congress in the Head Start Act, section 650(b), as amended (the Act). The Act requires that the Secretary of the U.S. Department of Health and Human Services submit to the Committee on Education and Labor of the U.S. House of Representatives and the Committee on Health, Education, Labor and Pensions of the U.S. Senate, at least once during every 5-year period a report concerning the condition, location, and ownership of facilities used or available to be used, by Indian Head Start agencies including Alaska Native Head Start agencies.

To meet the congressional reporting requirement, data collection on the status of facilities for this report began in Fiscal Year (FY) 2019. Facilities may change throughout the year for various reasons including to better meet the needs of the tribal community, due to a grant termination or relinquishment, and due to a disaster. Therefore, the status of facilities in this report represent a point in time in FY 2019 and, for alignment purposes, any supplementary data is also reported on FY 2019.

American Indian and Alaska Native Head Start Agencies and Funded Enrollment

The Head Start program promotes school readiness by providing comprehensive health, education, nutrition, socialization, and other developmental services for children from birth to age 5 and pregnant women. In FY 2019, a total of 155 American Indian and Alaska Native (AI/AN) grant recipients were funded by the Office of Head Start (OHS). These AI/AN grantees were funded to serve 23,208 enrollees, of which 18,344 (79 percent) were preschool-age children (ages 3 to 5 years) served in Head Start programs and 4,864 (21 percent) were infants, toddlers, and pregnant women served in Early Head Start programs. The AI/AN funded enrollment accounted for 2.7 percent of the total funded enrollment in Head Start and Early Head Start (hereafter collectively referred to as Head Start).

American Indian and Alaska Native Head Start Facilities and Program Options

At the time data collection began in FY 2019, there were 530 AI/AN Head Start facilities located throughout the United States. Of these, 527 were centers, which may include modular units, primarily used to provide Head Start services to children and their families. About 93 percent of children enrolled in these centers received services in center-based classroom settings, while the remaining 7 percent received services in home-based settings. The home-based program option delivers the full range of program services through visits with the child's parents, primarily in the

child's home and through group socialization opportunities. Home visitors are often located in the center when not conducting home visits and may utilize the center for group socialization activities. The number of classrooms/groups of children served in these centers ranges from one to 24. About three-fourths of AI/AN Head Start centers consist of one to three classrooms/groups of children. These centers may include administrative offices to support the oversight of program operations.

The remaining three AI/AN Head Start facilities are family childcare homes, which are used to operate a family childcare program option. In this program option, a family childcare provider provides the full range of program services in their home or other family-like setting.

Location, Ownership, and Condition of AI/AN Head Start Facilities

The 155 AI/AN Head Start grant recipients provided Head Start services across 26 states. Of the 530 AI/AN Head Start facilities used to provide program services, about 45 percent were owned by the programs. The remaining facilities were primarily rented or leased from other entities or donated to the grant recipient for the delivery of Head Start program services. A few grant recipients used classrooms located within a public school to provide program services, which the AI/AN grant recipient was able to use as part of a collaboration or partnership with their local education agency.

OHS conducted a voluntary web survey to obtain information on the condition of AI/AN Head Start facilities. The web survey was completed for 295 (56 percent) of the 530 AI/AN Head Start facilities. Among those who responded, AI/AN Head Start grant recipients indicated the following condition of their facilities:

Condition	Percent of Facilities
Poor facility in need of major renovation across most areas and could potentially be decommissioned.	9%
Fair facility with multiple areas needing major or minor renovation. The facility might be nearing its full-use lifecycle.	27%
Average facility that is fully operational with a regular maintenance schedule. It could use a few minor renovations.	33%
Good facility that is fully operational with a regular maintenance schedule. No need for renovations.	24%
Excellent , like new facility.	7%

Because the survey was voluntary and self-reported, OHS does not know the extent to which the responding group represents the full set of AI/AN Head Start grant recipients.

However, about 36 percent of grant recipients who did respond to the survey reported their facilities to be in either poor or fair condition. The following issues were raised with these facilities, in order of prevalence:

- External and internal structural components of the facility need to be repaired or replaced, primarily roofing, plumbing, and the heating, ventilation, and air conditioning (HVAC) system.
- Parking lot needs improvement to address safety or inadequate space concerns and inadequate or damaged fencing and sidewalks.
- Cracking or bulging floors inside the facilities.
- Inadequate or outdated safety features of the facility, including fire alarm and cameras.
- Kitchens need to be renovated to better meet the nutritional needs of children served.
- Doors and windows need to be replaced due to deterioration.
- Playgrounds need improvements to better handle the surrounding environment.
- Bathroom surfaces and plumbing need repairs.

AI/AN Head Start grant recipients indicated that, in some instances, not fully addressing facility issues have caused other facility issues to emerge, including pipes bursting during harsh weather, presence of mold and pests, and safety hazards. A few grant recipients raised concerns about the foundation of their facility. Grant recipients described facility issues leading to numerous short-term repairs that may be less cost-effective than a major renovation or replacement of certain facilities.

OHS continues to encourage AI/AN Head Start grant recipients to submit applications for one-time funding on the Head Start Enterprise System (HSES) when facilities require renovations and repairs related to health and safety. However, OHS makes it clear that one-time awards are not guaranteed and are contingent on the availability of funds to support such projects.

Otherwise, grant recipients must budget for ongoing maintenance and repairs within their annual operational funding. In the past few years, OHS has been able to support AI/AN facility projects through increases in Head Start appropriations.

Available Training and Technical Assistance Support for Facilities

The Early Childhood Learning and Knowledge Center (ECLKC) offers online facilities support to all Head Start grant recipients, including AI/AN grant recipients.¹ Materials provided on ECLKC address planning, budgeting for, and implementing facility activities, such as purchase, construction, and major renovation. Additionally, these materials support grant recipients in assuring that their facilities are safe, healthy learning environments that support the delivery of program services while also emphasizing the importance of ongoing inspection and maintenance of those facilities.

The National Center on Program Management and Fiscal Operations (NCPMFO) coordinates the efforts of the Fiscal Consulting Initiative (FCI). The initiative focuses on providing intensive fiscal technical assistance to grant recipients identified as having chronic systemic fiscal issues

¹ <https://eclkc.ohs.acf.hhs.gov/facilities>.

that affect the effective and efficient operation of their Head Start program. A cadre of OHS-vetted fiscal consultants, comprised of certified public accountants and auditors, provide the fiscal technical assistance. From 2015 to 2020, the FCI has provided comprehensive technical assistance to 59 AI/AN grant recipients. Additionally, the FCI has provided fiscal cluster trainings to Region XI throughout the country from 2017 to 2020 on key fiscal topics (i.e., cost principles, facilities management, cost allocation, and audits).

Also, Region XI has the dedicated support of a real property consultant through the Real Property and Facilities Initiative (RPFI) to support regional staff in addressing facility-related issues.

Report

Congressional Reporting Requirement

This report is provided in response to the mandate by Congress in the Head Start Act, section 650(b), as amended (the Act). The Act requires that the Secretary of the U.S. Department of Health and Human Services (HHS) submit to the Committee on Education and Labor of the U.S. House of Representatives and the Committee on Health, Education, Labor and Pensions of the U.S. Senate, at least once during every 5-year period:

a report concerning the condition, location, and ownership of facilities used or available to be used, by Indian Head Start agencies including Alaska Native Head Start agencies and Native Hawaiian Head Start agencies.

Presently, none of the six Head Start or Early Head Start grant recipients in Hawaii are Native Hawaiian organizations. Some are community action agencies and others are private, nonprofit organizations. The Head Start grant recipients in Hawaii provide services to eligible children without distinction of Hawaiian or any other ancestry. Therefore, this report does not cover the condition, location, or ownership of facilities in Hawaii as there were no entities designated as Native Hawaiian Head Start agencies.

To meet the congressional reporting requirement, data collection on the status of facilities for this report began in Fiscal Year (FY) 2019. Facilities may change throughout the year for various reasons including to better meet the needs of the tribal community, due to a grant termination or relinquishment, and due to a disaster. Therefore, the status of facilities in this report represent a point in time in FY 2019 and, for alignment purposes, any supplementary data is also reported on FY 2019.

Background on Head Start

The Head Start program is authorized by the Act, as amended by The Improving Head Start for School Readiness Act of 2007 (Pub. L. 110-134) on December 12, 2007 (42 U.S.C. 9801 et seq.). Head Start is a national program within HHS and the Administration for Children and Families (ACF) that serves primarily low-income children ranging in ages from birth to 5 years and their families. To help enrolled children achieve their full potential and promote school readiness, Head Start provides children with comprehensive health, nutrition, and education services; their parents receive family support and social services.

Head Start programs are required to provide opportunities for parents of enrolled children to be active participants in the program. Parents receive training and education that foster their understanding of and involvement in the development of their children. They contribute to the development, conduct, and governance of local programs through participation in policy councils

and parent groups. All Head Start services are designed to promote the development of children, to enable parents to fulfill their roles as their children's first teachers and primary care givers, and to move the family toward self-sufficiency.

Background on American Indian and Alaska Native Head Start

All AI/AN grant recipients are grouped into Region XI, which is based in Washington, DC, and administered by the Office of Head Start (OHS) from this central location. AI/AN Head Start programs were first funded in 1965 with 43 grant recipients across 14 states. In FY 2019, there were a total of 155 Indian tribes funded by OHS to provide AI/AN Head Start services to local communities. The term "Indian tribe" is defined by section 637 of the Act as "any tribe, band, nation, pueblo, or other organized group or community of Indians, including any Native village described in section 3(c) of the Alaska Native Claims Settlement Act (43 U.S.C. 1602(c)) or established pursuant to such Act (43 U.S.C. 1601 et seq.), that is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians." The total funding received by AI/AN programs was approximately \$320.5 million in FY 2019, not including funds for training and technical assistance.

The Act and Head Start regulations allow for up to 10 percent of the children enrolled in non-AI/AN Head Start programs to come from families that exceed the low-income guidelines. The over-income allowance is higher for AI/AN Head Start grant recipients at 49 percent, if the following conditions are met:

- The tribal program has served all eligible pregnant women or children who wish to be enrolled from Indian and non-Indian families living within the approved service area of the tribal agency
- The tribe has resources within its grant, without using additional funds from HHS intended to expand Early Head Start or Head Start services, to enroll pregnant women or children whose family incomes exceed low-income guidelines or who are not otherwise eligible
- At least 51 percent of the program's participants meet an eligibility criterion in 45 CFR 1302.12(c) (i.e., one of the four criteria listed above related to family income at or below poverty, public assistance, homelessness, or foster care)

About 28 percent of children enrolled in AI/AN programs were enrolled using the over-income eligibility category as the primary type of eligibility. These children are expected to be provided with opportunities to participate in the full range of Head Start activities with their peers and to receive needed special education and related services.

The diversity of languages, traditions, and heritage existing in AI/AN cultures are reflected and encouraged in AI/AN Head Start programs. When OHS revised the Head Start Program Performance Standards in 2016, a new provision was added that for the first time made it explicit that programs serving AI/AN children may integrate efforts to preserve, revitalize, restore, or

maintain tribal language into their education services.² About 4 percent of children served in AI/AN Head Start or Early Head Start programs lived in a household that primarily spoke a language other than English, with most of these families speaking a Native North American/Alaska Native language.

Tribal Sovereignty and Consultations

Tribes have the legal right to manage their own affairs, govern themselves internally, and engage in legal and political relationships with the Federal Government and states. As sovereign governments, the tribes have the power to do the following:³

- determine their own form of government;
- define the conditions of membership in the tribes;
- regulate domestic relations among tribal members;
- prescribe rules of inheritance for reservation property not in trust status;
- levy taxes on members and persons doing business with members or on tribal lands;
- regulate property under tribal jurisdiction;
- control the conduct of members by tribal ordinances; and
- administer justice among tribal members.

Federally recognized American Indian tribes and Alaska Native villages participate in legal government-to-government relationships with the United States of America. This unique relationship has been substantiated through treaties, legislation, Supreme Court decisions, and executive orders. As of 2020, there are 574⁴ federally recognized tribes, and the tribes have a combined service population of approximately 1.9 million AI/ANs.⁵

Tribes in the United States have their own distinctive cultures, languages, and identities. No single federal criterion establishes a person's identity as an AI/AN. Rather, tribal membership is determined by the enrollment criteria of the tribe. Tribal enrollment criteria are set forth in Tribal constitutions, articles of incorporation or ordinances, and vary from tribe to tribe.

The Act at section 640(1)(4) requires HHS to conduct tribal consultation sessions. The sessions are conducted in accordance with the HHS's Tribal Consultation Policy.⁶ In 2019, OHS planned six tribal consultation sessions for the purpose of better meeting the needs of AI/AN children and

² Refer to 45 CFR §1302.36.

³ See <https://www.bia.gov/frequently-asked-questions>.

⁴ See <https://www.federalregister.gov/documents/2020/01/30/2020-01707/indian-entities-recognized-by-and-eligible-to-receive-services-from-the-united-states-bureau-of>.

⁵ U.S. Department of the Interior, "Tribal Nations," <https://www.doi.gov/tribes/>.

⁶ The U.S. Department of Health and Human Services Tribal Consultation Policy is available at <http://www.hhs.gov/sites/default/files/iea/tribal/tribalconsultation/hhs-consultation-policy.pdf>.

families and for discussing funding allocations, distribution formulas, and other issues that were affecting the delivery of Head Start services.

At the consultations, tribe-elected officials and other authorized representatives of tribal governments had the opportunity to provide input on the development of policies or regulations, the interpretation of existing regulations, and other policies or procedures that affected Indian tribes. Table 1 lists the locations in which consultations were held in 2019.

Table 1: 2019 Tribal Consultations

Date	Location
June 18–20, 2019	Rocklin, California
June 27, 2019	Scottsdale, Arizona
July 10–11, 2019	Spokane, Washington
August 20–22, 2019	Denver, Colorado
September 16, 2019	Temecula, California

AI/AN Head Start grant recipients raised some concerns about the facilities used for Head Start program services during tribal consultations, including the aging of facilities, lack of funding to renovate facilities, difficulty with construction and renovation of facilities due to remote locations, the deterioration of facilities due to harsh weather, and general infrastructure concerns. OHS continued to encourage AI/AN Head Start grant recipients to regularly monitor their facilities to ensure they are safe for both children and staff and to implement systems for addressing the maintenance and renovation needs of physical environments using Head Start funds. Additionally, OHS continued to encourage AI/AN Head Start grant recipients to submit applications for one-time funding on the Head Start Enterprise System (HSES) when facilities require renovations and repairs related to health and safety. However, OHS was clear that one-time awards are not guaranteed and are contingent on the availability of funds to support projects. In the past few years, OHS has been able to support AI/AN facility improvement projects through increases in Head Start appropriations. For example, increased appropriations for Early Head Start Expansion and Early Head Start-Child Care Partnerships have supported AI/AN facility improvements in 2015, 2017, and 2019.

Four reports were developed to reflect comments and recommendations of AI/AN leaders and representatives that participated in the tribal consultations with comments and responses from OHS. The tribal consultation reports are available online on the Early Childhood Learning and Knowledge Center (ECLKC) at <https://eclkc.ohs.acf.hhs.gov/state-collaboration/article/tribal-consultation-reports>.

Data Sources

HSES is the primary electronic system used by OHS to support the administration of Head Start grants. Location and ownership data of Head Start facilities are available through existing OHS data collections in HSES.

The Program Information Report (PIR) collects information on the services, staff, and population served, and it is submitted by all Head Start grant recipients on an annual basis into HSES. The primary purpose of the PIR is to make data available on select foundational elements of local Head Start programs to a broad audience. This congressional report includes data from the PIR to provide additional context on services provided in AI/AN Head Start facilities.

For this report, OHS also conducted a voluntary web survey to obtain information on the condition of AI/AN Head Start facilities.⁷ The web survey was completed by 295 of the 530 (56 percent) AI/AN Head Start facilities.

Data collection for this report began in FY 2019 and since facilities are subject to change throughout the year, the status of facilities represents a point in time in FY 2019.

Funded Enrollment

To promote school readiness, OHS funded 155 AI/AN Head Start grant recipients to provide comprehensive health, education, nutrition, socialization, and other developmental services to 23,208 enrollees, which accounts for 2.7 percent of the total funded enrollment in Head Start. This funded enrollment includes 18,344 children ages 3 to 5 served in Head Start programs (79 percent) and 4,864 infants, toddlers, and pregnant women served in Early Head Start programs (21 percent).

The funded enrollment of AI/AN grant recipients ranged from 12 to 1,426 slots per grant recipient, with most grant recipients having between a 50 and 200 funded enrollment. The average center-based classroom size of an AI/AN Head Start preschool program serving children ages 3 to 5 was 17 slots compared to the national average of 16 slots; the average center-based classroom size of an AI/AN Early Head Start programs serving infants and toddlers was eight slots compared to the national average of seven.

American Indian and Alaska Native Head Start Facilities and Program Options

In FY 2019, there were 530 AI/AN Head Start facilities located throughout the United States. Of these facilities, 527 were centers, which may include modular units, primarily used to provide Head Start services to children and their families. About 93 percent of children enrolled in these centers received services in center-based classroom settings, while the remaining 7 percent received services in home-based settings. The home-based program option delivers the full range of program services through visits with the child's parents, primarily in the child's home

⁷ See OMB Control Number 0970-0534 for information collection.

and through group socialization opportunities. Home visitors are often located in the center when not conducting home visits and may utilize the center for group socialization activities.

The number of classrooms/groups of children served in AI/AN Head Start centers ranges from one to 24. About three-fourths of AI/AN Head Start centers consist of one to three classrooms/groups of children. AI/AN Head Start centers may include administrative offices to support the oversight of program operations.

The remaining three AI/AN Head Start facilities are family childcare homes, which are used to operate a family childcare program option. In this program option, a family childcare provider provides the full range of program services in their home or other family-like setting.

The count of facilities represents a point in time in FY 2019 since facilities may change throughout the year for various reasons, including intentional facility changes to better meet the needs of the tribal community, terminations, relinquishments, and facility changes due to a disaster.

Head Start Facility Requirements

The learning environment within a Head Start facility must be conducive to learning and adapted to the different stages of development of the children served. Grant recipients must ensure children are kept safe at all times. Facilities where children are served, including areas for learning, playing, sleeping, toileting, and eating are required to:

- meet licensing requirements;
- be kept clean and free of pests;
- be free from pollutants, hazards, and toxins that are accessible to children and could endanger children's safety;
- be designed to prevent child injury and free from hazards;
- be well lit, including emergency lighting;
- be equipped with safety supplies readily accessible to staff;
- be free from firearms or other weapons that are accessible to children;
- separate toileting and diapering areas from areas for preparing food or children's activities; and
- be kept safe through an ongoing system of preventative maintenance.⁸

A grant recipient must keep all facilities purchased or constructed in whole or in part with Head Start funds in good repair in accordance with all applicable federal, state, and local laws, rules and regulations, including Head Start requirements, zoning requirements, building codes, health and safety regulations, and childcare licensing standards.⁹

⁸ Refer to 45 CFR §1302.47.

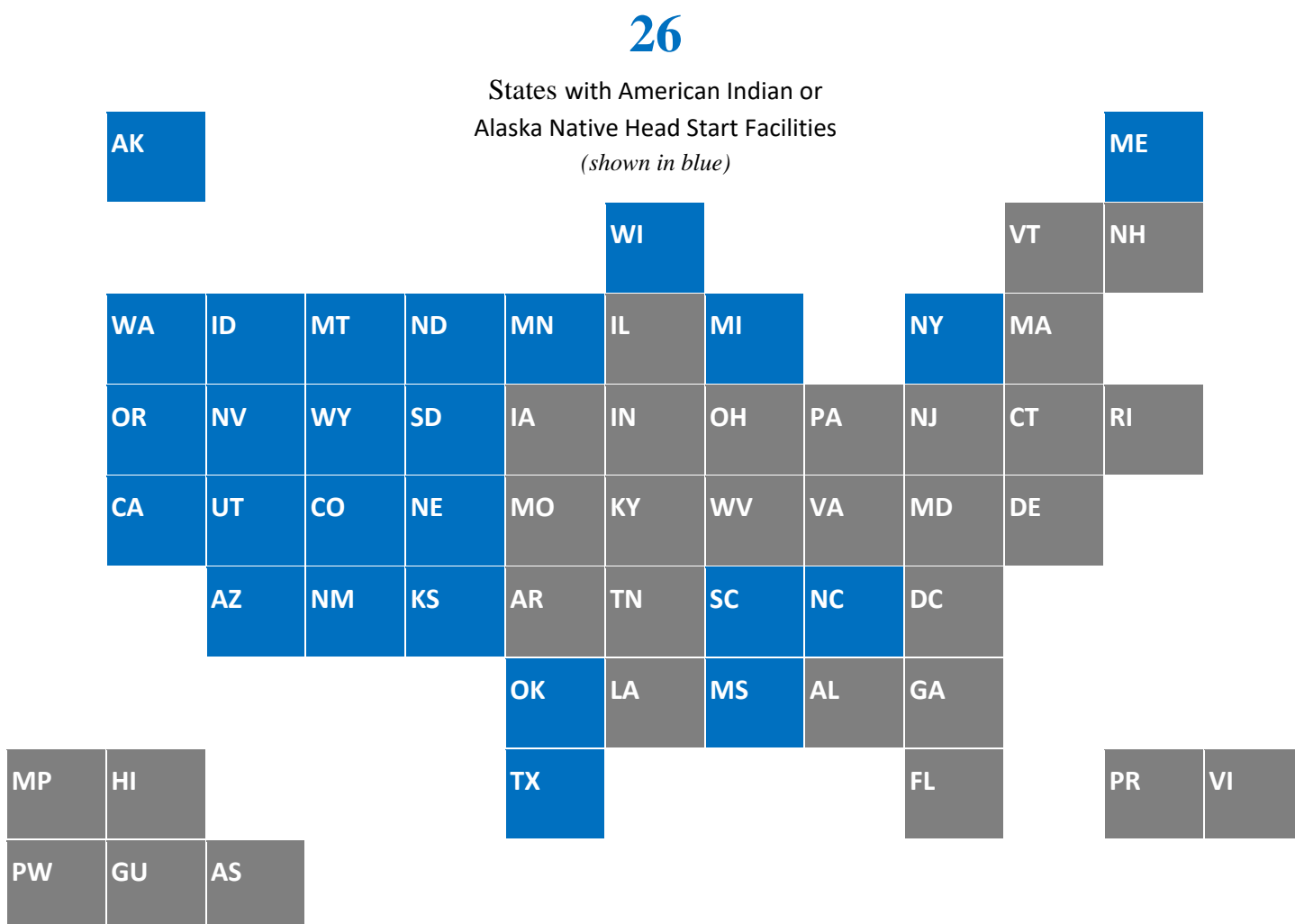
⁹ Refer to 45 CFR §1303.52(c).

The interior and exterior architectural design of Head Start facilities vary, but all facilities used for center-based program services must have at least 35 square feet of usable indoor space per child available for the care and use of children (exclusive of bathrooms, halls, kitchen, staff rooms, and storage places) and at least 75 square feet of usable outdoor play space per child.

Locations

The 155 AI/AN Head Start grant recipients operate 530 Head Start facilities across 26 states. The vast majority of the 26 states are towards the west of the United States, as shown in Figure 1.

Figure 1: Map of States with American Indian/Alaska Native Head Start Facilities



AI/AN facilities include Head Start preschool programs serving children ages 3 to 5 years old and Early Head Start programs serving infants, toddlers, and pregnant women. Arizona, Oklahoma, and Alaska have the greatest number of AI/AN facilities.

Table 2: American Indian/Alaska Native Head Start Facilities by State and Program Type

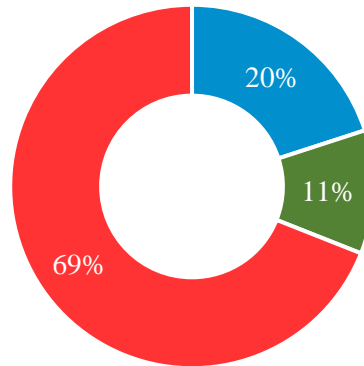
State	Both HS and EHS	HS Only	EHS Only	Total
AZ	5	63	7	75
OK	9	49	17	75
AK	20	45	4	69
NM	6	39	1	46
SD	11	27	3	41
MT	5	27	6	38
WA	6	15	6	27
MN	12	9	3	24
CA	5	13	3	21
WI	6	12	1	19
ND	1	15	1	17
NV	0	14	0	14
MI	8	4	0	12
OR	2	7	0	9
MS	4	2	1	7
WY	0	4	3	7
UT	0	6	0	6
ID	2	2	1	5
NE	0	3	1	4
ME	0	3	0	3
NY	0	3	0	3
KS	2	0	0	2
NC	1	1	0	2
TX	0	2	0	2
CO	0	1	0	1
SC	0	1	0	1
Total	105	367	58	530

Note. EHS = Early Head Start; HS = Head Start.

About 69 percent of AI/AN Head Start facilities only provide Head Start preschool program services for children ages 3 to 5 years old; about 11 percent only provide Early Head Start program services for infants, toddlers, and pregnant women; and 20 percent provide both program services.

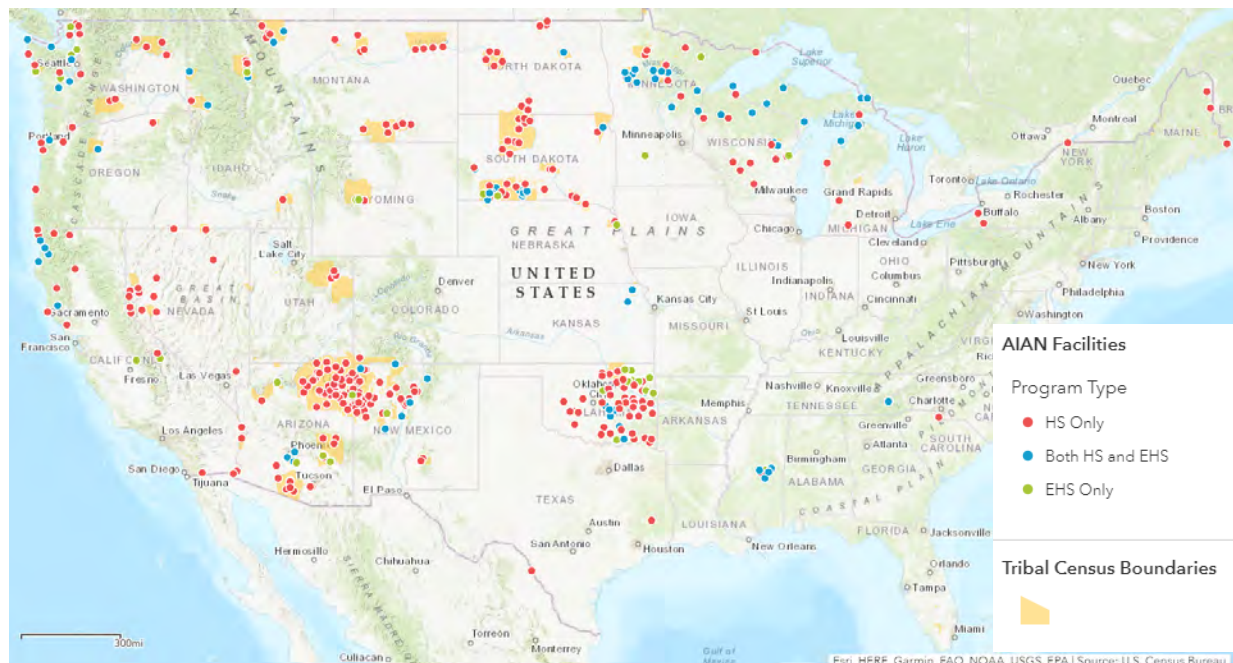
Figure 2: American Indian/Alaska Native Head Start Facility Program Type

■ Head Start Only ■ Early Head Start Only ■ Both Head Start and Early Head Start



The following collection of maps provides a more detailed view of the location of the 530 AI/AN Head Start facilities operated by the 155 AI/AN Head Start grant recipients. The maps provide both a national overview of the facilities across the contiguous United States and a more detailed view of geographic areas with a high number of centers, including in Alaska, Arizona, Oklahoma, and the Great Plains region. Updated program service location datasets are available to download on ECLKC at <https://eclkc.ohs.acf.hhs.gov/about-us/article/head-start-center-location-datasets>.

Figure 3: American Indian/Alaska Native Head Start Facilities in the Contiguous United States



Note. EHS = Early Head Start; HS = Head Start.

Tribal census boundaries, provided by the U.S. Census Bureau, are small, relatively permanent statistical subdivisions of a federally recognized American Indian reservation. They are nested within reservation boundaries but may cross state and county boundaries. Tribal governments update most boundaries prior to each decennial census through the Tribal Statistical Areas Program. If a tribal participant is not available, the Census Bureau updates the boundaries.

Figure 4: American Indian/Alaska Native Head Start Facilities in Alaska

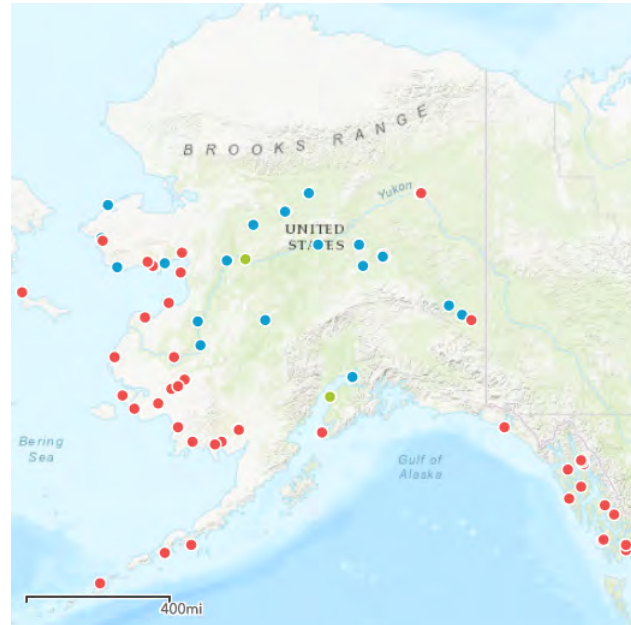


Figure 5: American Indian/Alaska Native Head Start Facilities in Arizona and New Mexico

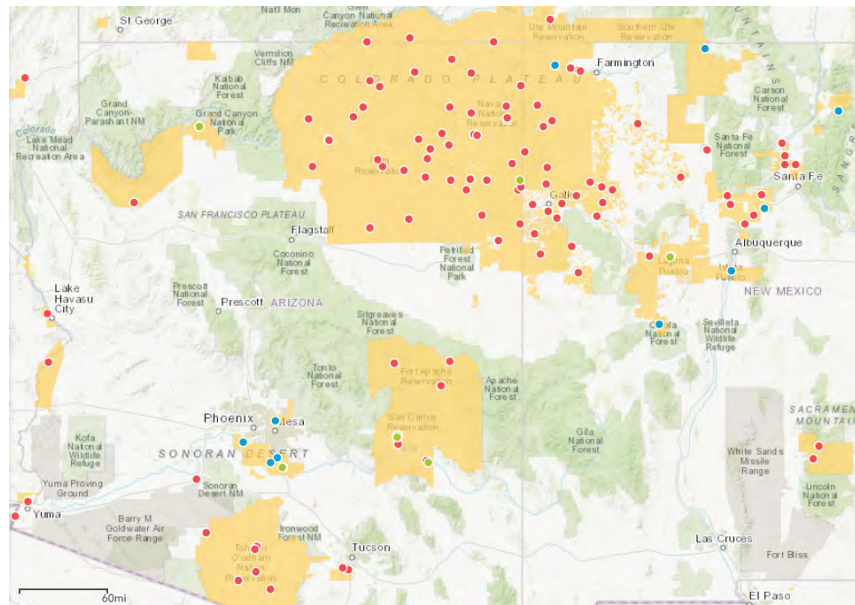


Figure 6: American Indian/Alaska Native Head Start Facilities in Oklahoma

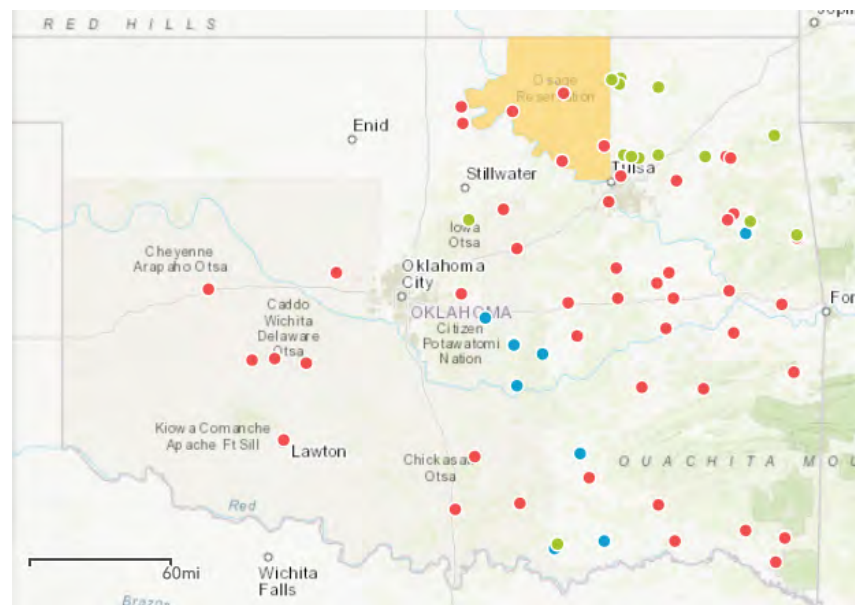
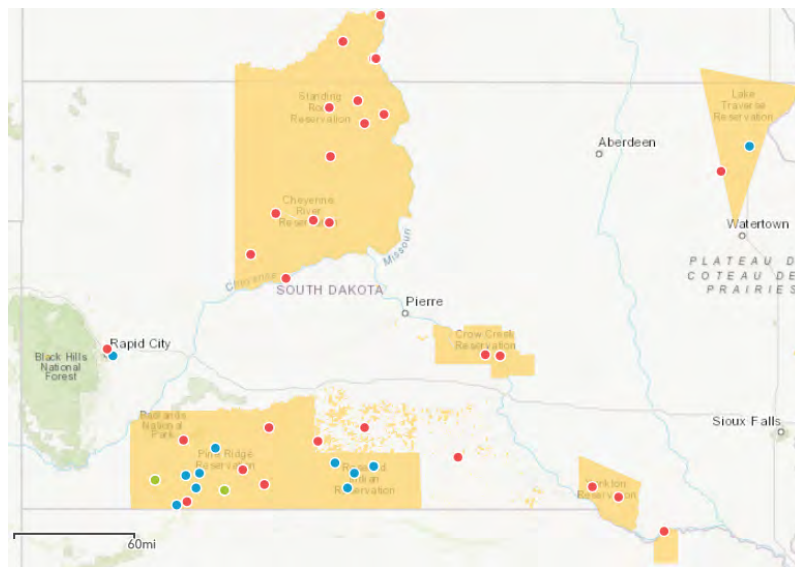


Figure 7: American Indian/Alaska Native Head Start Facilities in South Dakota



Many AI/AN facilities are not located within tribal census boundaries, as the majority of the AI/AN population (78 percent) across the United States lives outside of tribal lands. Additionally, not every federally recognized tribe has a reservation. At the same time, most counties across the United States with relatively higher proportions of AI/AN populations tend to be in close proximity to tribal lands.¹⁰

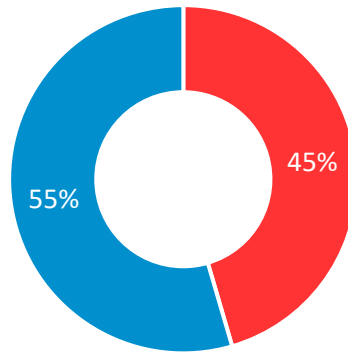
Ownership

Of the 530 AI/AN Head Start facilities used to provide program services, about 45 percent were owned by the program. The remaining facilities were primarily rented or leased from other entities or donated to the grant recipient for the delivery of Head Start program services. A few grant recipients used classrooms located within a public school to provide program services that the AI/AN grant recipient was able to use as part of a collaboration or partnership with their local education agency.

¹⁰ U.S. Census Bureau, “2010 Census Shows Nearly Half of American Indians and Alaska Natives Report Multiple Races,” January 25, 2012. https://www.census.gov/newsroom/releases/archives/2010_census/cb12-cn06.html.

Figure 8: Ownership of American Indian/Alaska Native Head Start Facilities

■ Yes, Owned by the Program ■ No, not Owned by the Program

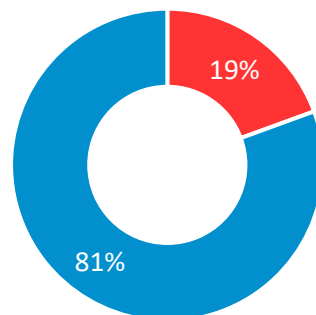


A facility acquired under a grant results in the AI/AN Head Start facility being vested in the grant recipient, subject to the condition that the grant recipient use the facility for the authorized purpose of the program. The grant recipient may not dispose of or encumber the title except as provided under federal statutes. When federal funds are used to purchase or renovate a facility, including leased facilities, grant recipients must file a Notice of Federal Interest.¹¹

Of the 530 AI/AN centers, 103 centers (19 percent) have federal interest. The majority of centers, 427 centers (81 percent), operate without federal interest.

Figure 9: American Indian/Alaska Native Centers with and without Federal Interest

■ Yes, Facility has Federal Interest ■ No Federal Interest



¹¹ Refer to 45 CFR §1303.46.

The requirements of 45 Code of Federal Regulations (CFR), section 1303, cover all arrangements through which a grant recipient uses Head Start funds to purchase, construct, or make major renovations (totaling \$250,000 or more) to a facility. Under 45 CFR, section 1303.46, there must be a Notice of Federal Interest in the official property records for the jurisdiction where the facility is or will be located, when:

- a grant recipient uses federal funds to purchase real property or a facility, excluding modular units, appurtenant to real property,
- when a grant recipient uses federal funds in whole or in part to construct a facility, or
- when a grant recipient uses federal funds to renovate a facility that it, or a third party, owns.

If a grant recipient uses federal funds in whole or in part to purchase a modular unit or to renovate a modular unit, the grant recipient must post the notice of federal interest, in clearly visible locations, on the exterior of the modular unit and inside the modular unit.

Conditions

The conditions of facilities were provided through a voluntary grant recipient survey by 295 (56 percent) of the 530 AI/AN Head Start facilities. Table 3 shows how AI/AN grant recipients indicated the following condition of their facilities.

Table 3: American Indian/Alaska Native Head Start Facilities by Condition

Condition	% of Facilities
Poor facility in need of major renovation across most areas and could potentially be decommissioned.	9%
Fair facility with multiple areas needing major or minor renovation. The facility might be nearing its full-use lifecycle.	27%
Average facility that is fully operational with a regular maintenance schedule. It could use a few minor renovations.	33%
Good facility that is fully operational with a regular maintenance schedule. No need for renovations.	24%
Excellent , like new facility.	7%

About 36 percent of facilities were reported to be in either poor or fair condition. The following issues were raised with these facilities, in order of prevalence:

- External and internal structural components of the facility need to be repaired or replaced, primarily roofing, plumbing, and the heating, ventilation, and air conditioning (HVAC) system.
- Parking lot needs improvement to address safety or inadequate space concerns and inadequate or damaged fencing and sidewalks.

- Cracking or bulging floors inside the facilities.
- Inadequate or outdated safety features of the facility including fire alarm and cameras.
- Kitchens need to be renovated to better meet the nutritional needs of children served.
- Doors and windows need to be replaced due to deterioration.
- Playgrounds need improvements to better handle the surrounding environment.
- Bathroom surfaces and plumbing need repairs.

AI/AN Head Start grant recipients indicated that not fully addressing facility issues has caused other facility issues to emerge, including pipes bursting during harsh weather, presence of mold and pests, and safety hazards across the facility. A few grant recipients raised concerns with the foundation of the facility. Grant recipients described facility issues leading to numerous short-term repairs that may be less cost-effective than a major renovation or replacement of certain facilities.

The deterioration of facilities due to age continues to be a concern raised by AI/AN Head Start grant recipients. In 2015, we estimated that, by 2020, 25 percent of AI/AN Head Start facilities will have aged at least 40 years since the original date of construction. In addition to age, AI/AN Head Start grant recipients continue to report severe weather as a catalyst of facility issues.

OHS continues to encourage AI/AN Head Start grant recipients to submit applications for one-time funding on the HSES when facilities require renovations and repairs related to health and safety. However, OHS makes it clear that one-time awards are not guaranteed and are contingent on the availability of funds to support such projects. Otherwise, grant recipients must budget for ongoing maintenance and repairs within their annual operational funding. In the past few years, OHS has been able to support AI/AN facility projects through increases in Head Start appropriations.

Available Training and Technical Assistance Support for Facilities

The ECLKC offers online facilities support to all Head Start grant recipients, including AI/AN grant recipients.¹² Materials provided on ECLKC address planning, budgeting for, and implementing facility activities, such as purchase, construction, and major renovation. Additionally, these materials support grant recipients in assuring that their facilities are safe, healthy learning environments that support the delivery of program services, while also emphasizing the importance of ongoing inspection and maintenance of those facilities.

The National Center on Program Management and Fiscal Operations (NCPMFO) coordinates the efforts of the Fiscal Consulting Initiative (FCI). The initiative focuses on providing intensive fiscal technical assistance to grant recipients identified as having chronic systemic fiscal issues that affect the effective and efficient operation of their Head Start program. A cadre of OHS-

¹² <https://eclkc.ohs.acf.hhs.gov/facilities>.

vett ed fiscal consultants, comprised of certified public accountants and auditors, provide the fiscal technical assistance. The FCI, from 2015 to 2020, has provided comprehensive technical assistance to 59 AI/AN grant recipients and has assisted them in implementing changes to their practice to improve their financial management systems.

In addition, from 2018 to 2020, enhanced FCI technical assistance has been provided to two AI/AN grant recipients that have nuanced and intricate fiscal system issues. This collaborative work consists of multiple engagements, frequent communication, and the provision of technical support via NCPMFO fiscal specialists, FCI consultants, Region XI grant recipient specialists, Regional Office program specialists, and the Office of Grants Management grant specialists. NCPMFO staff includes several individuals with facilities expertise who are able to support the development and delivery of facilities-specific training and materials.

Finally, the FCI has provided fiscal cluster trainings to Region XI throughout the country during the last 3 years of the 5-year project period, from 2017 to 2020. These trainings were conducted in tandem by NCPMFO fiscal specialists and FCI consultants on key fiscal topics (i.e., cost principles, facilities management, cost allocation, and audits) to the AI/AN community. These trainings were primarily for leadership in the programs, as well as grant recipient officials and fiscal staff.

Region XI has the dedicated support of a real property consultant through the Real Property and Facilities Initiative (RPFI). The purpose of the RPFI is to support regional staff in addressing facility-related issues in their Regions.

OHS will continue to make available and provide training and technical assistance support for AI/AN facilities to support grant recipients in providing safe and healthy learning environments to all the children and families served.