



Design Options, Priorities, and Considerations for a National Native Languages Survey

Final Report

June 2024

Diana Gates (Čiruʔəhá-ka-ʔ), Lizabeth Malone, Kathleen Feeney, Lauren Tingey, Nancy Clusen, Johnny Willing, Clare Bradshaw (Okáxpá, ʕʌʒʌʒʌ), and Giovanna Bautista Rodriguez

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The Administration for Native Americans (ANA) within the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS) is responsible for designing and implementing a survey to understand the status of all Native American languages spoken in the United States. ANA has undertaken this project in partnership with ACF's Office of Planning, Research, and Evaluation (OPRE) to plan and engage with community partners to learn about what to ask and how to survey Tribal Nations and Native American language communities about their language status. In partnership, OPRE and ANA awarded a contract called *Survey on Use of All Native American Languages in the United States* to Mathematica and Miami Environmental and Energy Solutions (MEES), a Tribal 8a business, to formulate the survey and design options.

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I. Executive Summary

Each Native language embodies a living repository of ancestral wisdom, cultural identity, and a unique worldview intricately woven into the fabric of their societies. Together, the resilience of this linguistic diversity continues to shape the rich culture of Tribal Nations and Native American language communities, including Native Hawaiians and Pacific Islanders, across the United States. Beyond resilience, the efforts of Tribal Nations and Native American language communities to preserve, restore, and celebrate their languages (Lyon 2017) has been characterized as *survivance*: the idea that language revitalization is not solely about combatting language loss, but about asserting sovereignty, reclaiming historical agency, and healing the damage caused by centuries of colonization, destructive federal policies, and forced assimilation (Hermes et al. 2012; Lyon 2017; McCarty 2018; Reyhner et al. 2004).

Language revitalization holds profound significance for Tribal Nations, Native Hawaiian, Pacific Islander, and Native American language communities, serving as a protective factor that safeguards cultural heritage and fosters community well-being. Revitalizing Native languages invigorates entire knowledge systems and ways of relating with the world. By reclaiming and revitalizing their languages, Native communities reclaim essential elements of their identities, disrupt cultural shaming, and instill cultural pride. This affirmation of cultural identity not only promotes individual and collective well-being but also breathes life back into other cultural practices, such as storytelling, music-making, and foodways. Moreover, language revitalization confronts damaging narratives that portray Native peoples as in need of external intervention. By emphasizing the inherent strengths and resilience of Native communities, language revitalization initiatives offer a proactive and empowering approach to strengthening Native cultures, upholding Tribal sovereignty, and promoting self-determination.

The Durbin Feeling Native American Languages Act of 2022 (Durbin Feeling Native Languages Act of 2022) established federal support for a national survey on the revitalization, maintenance, and use of all Native American languages in the United States. The Administration for Native Americans (ANA) within the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS) is responsible for designing and implementing a survey to understand the status of all Native American languages spoken among American Indian and Alaska Native Tribes, Native Hawaiian and Pacific Islander communities, and distinct Native American language communities in the United States.¹ Thereafter, ANA will administer the survey every five years using a learning-oriented approach: an iterative process to learn from experience and improve the effort over time. It will be critical for the federal government to allocate sufficient resources to implement the survey in a way that centers a learning-oriented approach and honors community voices. With this investment, future survey data will inform continuing interagency efforts and policies to better support efforts to revitalize Native languages.

The current survey design project is a first step in this endeavor. ANA has undertaken this project in partnership with ACF's Office of Planning, Research, and Evaluation (OPRE) to plan and engage with community partners to learn about what to ask and how to survey Tribal Nations and Native American language communities about their language status. In partnership, OPRE and ANA awarded a contract to

¹ We define Native American language communities further in Section III (*Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*).

Mathematica and Miami Environmental and Energy Solutions (MEES), a Tribal 8a business, to formulate the survey and design options. The project has three objectives:

1. **Community engagement.** An intentional outreach and engagement process that cultivated relationships with Elders and other experts in Native linguistics, language acquisition, and language reclamation.
2. **Survey development.** An initial survey drafted and then revised based on public comments and community input.
3. **Design, data collection, and analysis approaches.** A plan outlining design considerations for a national survey following culturally congruent approaches to promote high response rates.

Ultimately, the goal of the survey is to be a *national census* of Native languages, meaning each Tribal Nation and Native American language community would be invited to respond to the survey. Because data would be reported at the community level, outreach efforts will identify at least one representative to respond to the survey on behalf of each participating entity (in other words, each participating Tribal Nation and Native American language community).

Native voices have guided every aspect of survey and design plan development thus far. As part of this project, ACF, Mathematica, and MEES formed a Community Working Group (CWG) to provide feedback on the design of the initial drafts of the survey, public comments received, the revised survey, and the design of plans for engaging communities in survey administration. The CWG met from December 2023 to June 2024.² Following all CWG engagements, Mathematica and MEES hosted meaning-making sessions with expert project consultants from the Myaamia Center at Miami University and the University of Oklahoma to help synthesize, organize, and apply feedback from the CWG directly to action steps for the survey and design plan.³ In addition, ANA hosted and participated in various opportunities to meet with and gather input from Tribal leaders, Native organizations, and community members, both before and during the project's contract period. ANA gathered and shared information through ACF Tribal consultations and listening sessions from June 2023 through February 2024 that have informed the survey development and design planning. A Notice of Public Comment on a draft set of survey questions and administrative questions was open from March 8 to April 8, 2024.⁴ A summary of input is available by contacting ANA at anacomments@acf.hhs.gov.

Respectful engagement with Tribal Nations and Native American language communities requires diverse modalities that elevate sovereignty and self-determination and establish clear, transparent, and mutually agreed upon protocols for data collection, management, and future use.⁵ In Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American*

² We present a list of members in the acknowledgements who shared their knowledge and insights and engaged in discussions to elevate priorities for the survey and considerations for survey implementation.

³ We include our expert project consultants in the acknowledgements who have expertise in Native linguistics, language acquisition, and language reclamation.

⁴ We present a list of all opportunities for community input received through April 2024 in Appendix A.

⁵ One example of a federal effort that has set a precedence for consultations with Tribal Nations was the effort to develop of the 2020 Census, which engaged both federally (see U.S. Census Bureau 2017a) and state-recognized Tribal Nations (see U.S. Census Bureau 2017b) in informing updates to the 2020 Census form and implementation.

Language Communities for a National Survey), we outline three essential pillars to recommend to the future survey team⁶ for respectful engagement with Tribal Nations and Native American language communities:

Pillar 1. Agreement to Participate. Establishing an agreement to participate in the survey between the Nation or community and the federal government.

Pillar 2. Local Research Review. Ensuring local research review entities have approved the protocol for survey administration.

Pillar 3. Data Stewardship Committee. Establishing a Data Stewardship Committee to advise on and guide all aspects of data use, interpretation, and dissemination of findings.

Successful administration of a national Native American language survey requires more time to build community relationships. Current Congressional authorization of appropriations are insufficient to conduct a full survey and to do so with significant participation by Tribal Nations and Native American language communities. This is because of the history of destructive federal policies and unethical and exploitative research practices conducted by the government, medical and academic institutions, which have led to deep-seeded distrust of federal research activities with Tribal Nations and Native communities. More specifically, practices that include not obtaining informed consent, withholding information, using data outside of approved research protocols, and extreme cases such as using of dangerous chemicals and medical procedures that caused disease, disability, and death, have understandably created suspicion and cynicism about whether any federally funded research can be trusted and beneficial at the community level. More time is needed to build trusting relationships and preview and test the survey before the full survey is ready for full implementation. The time and effort needed to prepare for national implementation is not intended to delay or deter federal funding of language revitalization, maintenance, and use efforts that are critically needed. As confirmed by the numerous Tribal Nations and Native American language communities that have provided input and advised on best practices on the draft survey and design plan, the future survey administration should follow these best practices. This presents a valuable opportunity to reframe how federal research is conducted with transparency, reciprocity, and in true partnership.

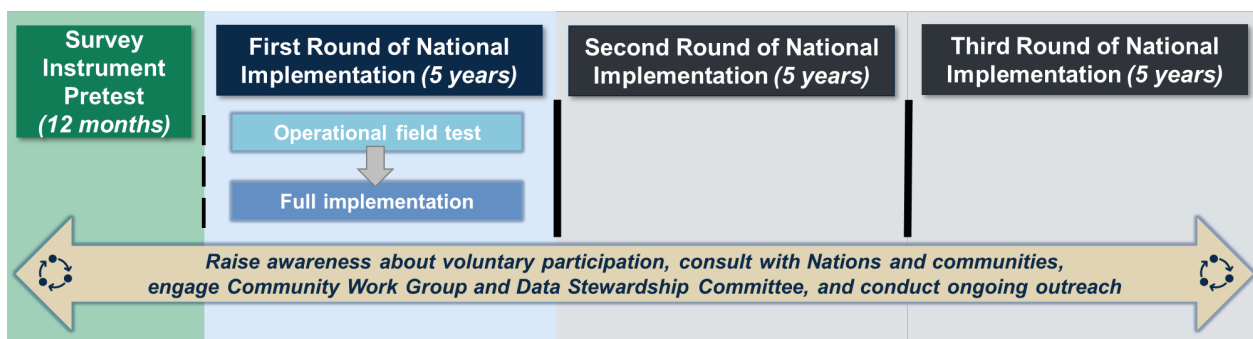
The national implementation of this voluntary data collection effort will be administered under five-year cycles, but additional design work should be conducted after the end of this contract to support the first round of national implementation. In Section V (*Recommendation for Additional Design Preparation to Finalize Content and Procedures for Successful National Implementation*), we identify two key phases that need to occur to support successful implementation using a learning-oriented approach: a survey instrument pretest and an operational field test. As outlined in Exhibit I.1, the draft survey instrument should be pretested the year *before* launching the first round of data collection, and the first round of national implementation should begin with a two-year operational field test phase. Both a survey instrument pretest and an operational field test would provide valuable insight into the variabilities, length of time, and culturally appropriate investment in community outreach and engagement needed in the future. This kind of iterative, learning-oriented approach has been used in similar work to understand Indigenous languages used in Australia (the National Indigenous Languages

⁶ We refer to the future implementers of a study as “the future survey team” throughout this plan.

Survey [NLS]), which began with extensive field testing and has iteratively refined its survey instruments and data collection procedures—in consultation with Indigenous communities—over multiple rounds (see subsection V.A, within Section V, *Recommendation for Additional Design Preparation to Finalize Content and Procedures for Successful National Implementation*).

- Pretesting the survey instrument with a small number of Tribal Nations and Native American language communities will allow the future survey team to refine and streamline the survey instrument to align content with key learning priorities while minimizing participant burden.
- Field testing the survey operations in a limited number of Tribal Nations and Native American language communities will allow the future survey team to understand cultural receptivity and community congruence, build trusting relationships, and establish culturally and scientifically rigorous protocols required to gather data needed to complete the survey.

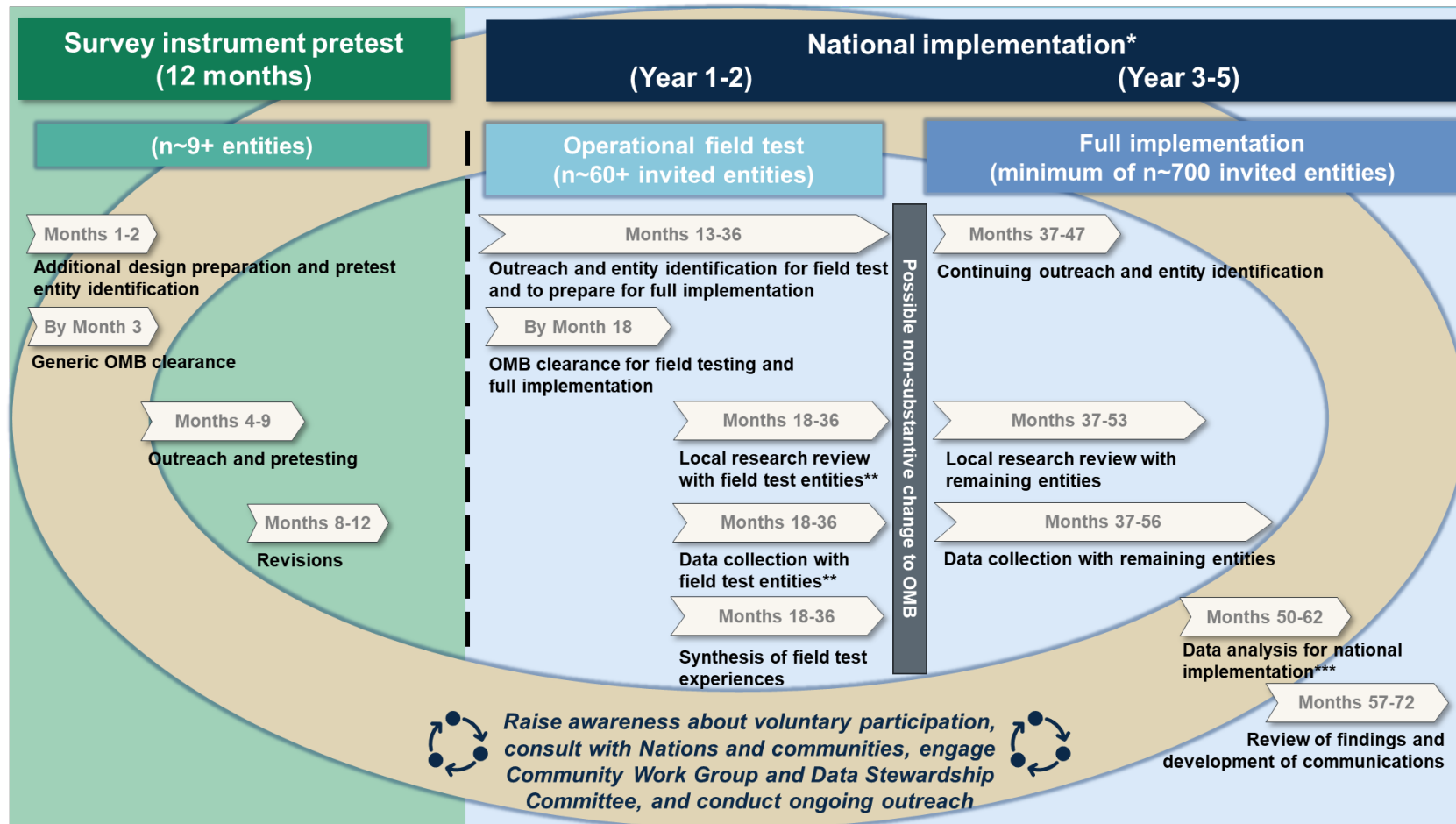
Exhibit I.1. Timeline overview for first three rounds of national implementation



This proposed plan delineates survey priorities and considerations about how to implement the survey. The proposed plan follows a learning-oriented approach, a process that will build relationships and trust between the federal government and Tribal Nations and Native American language communities, expand knowledge about federal efforts underway, and refine survey content and approaches over time. It also reflects ACF's [Roadmap for Collaborative and Effective Evaluation in Tribal Communities](#).

The steps and possible timeline needed to finalize the survey content and administration design and then implement the final survey design for the first round of national implementation is presented in Exhibit I.2. Using a learning-oriented approach to inform all future work, later rounds of national implementation after the first round should begin with intentional time to review and pretest changes as needed. Potential steps and timeline for later national implementation rounds are outlined in Exhibit I.3. Finally, additional details and considerations about these steps and timelines are described in Exhibit I.4.

Exhibit I.2. Potential process timeline of survey preparation and implementation activities for first round of national implementation



* There may be a minimum 760 entities invited to participate in the voluntary data collection for the national implementation across the field test and full implementation.

** Local research reviews and data collection efforts will continue for any field test entities as needed alongside the remaining entities from full implementation.

*** Survey data provided by participants during the field test and full implementation efforts will be combined for analysis and reporting as a single round of data.

Exhibit I.3. Potential process timeline of future rounds of national implementation

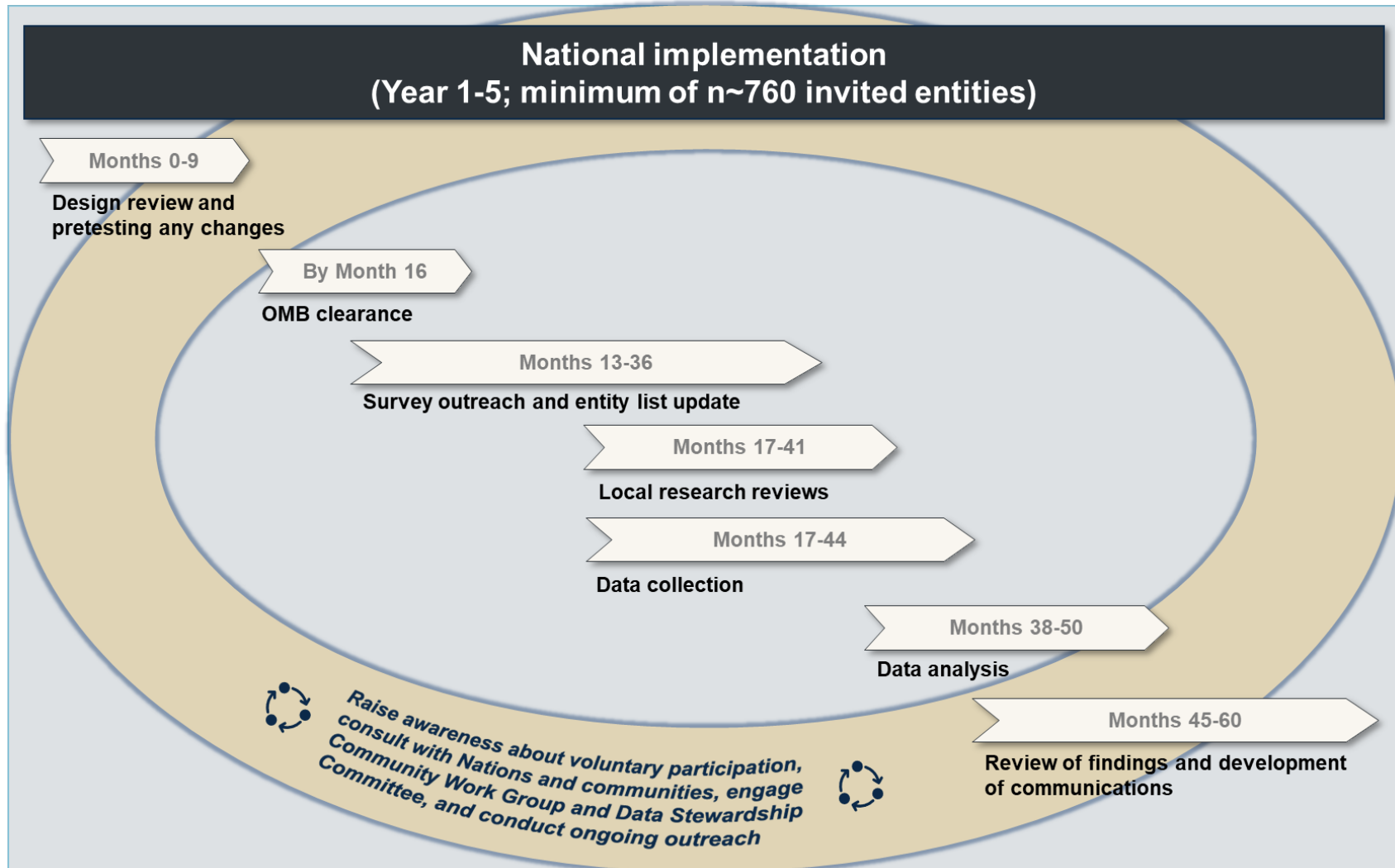


Exhibit I.4. Considerations for steps and timelines in national implementation cycles

Consideration	Timeline	Suggestion
Identifying Tribal Nation or Native American language community contacts	This process will vary in specific requirements and the time needed	The federally recognized Tribal Nations have a list to begin outreach and confirmation of the current government leadership. State-recognized Tribal Nations have points of contact noted on websites. For Native American language communities, organization websites may provide contacts. Indian Health Boards and Tribal Epidemiology Centers have connection with communities that could allow for the identification of representatives. ANA also has information for grant applicants and TA recipients. ANA can make this information available to a future survey team to identify the appropriate contacts.
Allow time and collaboration for establishing an agreement to participate	This process will vary in specific requirements and the time needed	Conduct advanced outreach to Tribal communities and organizations serving Tribal communities. This will include identifying opportunities to present and discuss the survey and data collection efforts at various venues and events. Identify the appropriate representatives for the community and make initial connection via multiple sources. Anticipate multiple rounds of follow up outreach and the likely potential of turnover in identified representatives.
Learn and follow the local research requirements	This process will vary in specific requirements and the time needed	The future survey team should discuss with the government which communities they will travel to for ongoing engagement activities; this decision will likely vary by community and be based on the quality and frequency of prior communications, requirements of local research review, community location and available resources.
Form a data stewardship committee	This process will vary in specific requirements and the time needed	Items to consider for forming the committee include (1) who will establish and operate the committee, (2) how many members should it comprise, (3) what kind of representation is critical to advise on data use, (4) how to identify members, and (5) if committee members will receive compensation for their engagement.
Data Collection	Timeline will mirror local review processes, with a minimum of 3 months past completion of that step	Establishing a trusted relationship with partners will help with engaging early and often with communities. For follow up efforts, we recommend the future survey team reach out to participating entities through a variety of methods, offer various survey modes, and provide tokens of appreciation.

Consideration	Timeline	Suggestion
Sharing Findings	Analysis preparation and interpretation may require 6-12 months. Review of findings and products may require 10-15 months. Activities can begin prior to the end of data collection.	Determine early the analytic approach and products with CWG and Data Stewardship Committee input. Allow sufficient time for participating entity review (such as Tribal Council or government approval of written comments), with a minimum of three months.

This proposed plan presents more information on all of these topics in a separate section, as listed below. Following this list, we provide information on key terms used and acronyms referenced throughout.

The plan will further highlight the following:

- Section II: Understanding the current landscape of Native American language use through a national survey and making the case for increased federal investment in language revitalization and maintenance
- Section III: Defining language communities in accordance with the Durbin Feeling Native Languages Act of 2022 and identifying which Tribal Nations and Native American language communities are entities to complete the survey
- Section IV: Engaging Tribal Nations and Native American language communities, outlining pillars and community participatory research principles to respect Tribal sovereignty and self-determining communities and continued engagement throughout with a Community Work Group and a committee to support data stewardship
- Section V: Conducting a pretest of the draft survey content and starting the first national implementation with an operational field test with a smaller set of entities before full implementation of the survey to learn more about creating a comprehensive list of Tribal Nations and Native American language communities, conducting outreach and trust-building activities, gaining local permissions and approvals, administering the survey, reviewing the data, and applying lessons learned to final survey and design plan
- Section VI: Describing the survey content and administrative characteristics, the representatives who should complete the survey, and future survey design (with a draft survey as an attachment to this plan)
- Section VII: Working with participating entities to collect the data, describing the roles of the future survey team with outreach partners, data confidentiality protections, approaches to achieve high completion rates, and data file preparation
- Section VIII: Ensuring a strengths-based approach in learning from the data provided, with considerations for analysis and ways to communicate and share findings
- Section IX: Closing reflections

Key Terms

Terms	Definitions
Native American language community	A group of people with a shared identity or interest who come together to learn, communicate, collaborate, and share resources. A language community must have two characteristics: (1) a governance or organizational infrastructure and (2) a connection to at least one Native American community.
Durbin Feeling Native Languages Act of 2022	This act sets to improve interagency coordination for purposes of supporting revitalization, maintenance, and use of Native American languages.
Learning-oriented approach	An iterative process to learn from experience and improve over time
Community Working Group (CWG)	A group comprised of those invested in language reclamation and who will represent the interest of Tribal Nations and language communities. These individuals may be community members, linguists, Elders, Tribal leaders, academics and/or grass-roots organizers. The CWG will provide feedback on the draft survey, public comments received, the revised survey, and plans for engaging communities in survey administration.
Agreement to Participate Pillar	A central pillar to this work that involves the Tribal Nation or community engaging in an agreement with the federal government to participate in the survey.
Local Research Review Pillar	A central pillar to this work that involves ensuring local research review entities have approved the protocol for survey administration.
Data Stewardship Committee Pillar	A central pillar to this work that establishes a data stewardship committee to advise on and guide all aspects of data use, management, interpretation, and dissemination of findings.
Pretesting	Process that will identify and recruit purposive sample, prepare protocols, facilitate semi-structured interviews, review, and synthesize feedback, and apply changes to survey
Field testing	Process that will identify and recruit purposive sample, prepare multimode survey, conduct outreach and trust-building activities, gain local permissions and approvals, administer multimode survey, review data, and synthesize lessons learned and apply to final survey and design plan

Acronyms

ACF	Administration for Children and Families
ANA	Administration for Native Americans
ANC	Alaska Native Corporations
BIA	Bureau of Indian Affairs
CATI	computer-assisted telephone interview
CCU	cross-cultural understanding
CWG	Community Working Group
HHS	U.S. Department of Health and Human Services
IRB	Institutional Review Board
IHS	Indian Health Service
ITC	Inter-Tribal Councils
MEES	Miami Environmental and Energy Solutions
NILS	National Indigenous Languages Survey
OMB	Office of Management and Budget
OPRE	Office of Planning, Research, and Evaluation
PII	personally identifiable information
TCU	Tribal colleges and universities
UIO	urban Indian organizations

II. Understanding the Current Landscape of Native American Language Use Through a National Survey and Making the Case for Increased Federal Investment in Language Revitalization and Maintenance

Loss of Native languages in the United States started more than 400 years ago and is the result of Euro-American colonization and destructive federal government policies and practices. The suppression of Native languages began with the arrival of European explorers and intensified during the era of American colonization. Numerous federal policies have been aimed at eradicating Native people, such as the forced removal of Native children to attend boarding schools,⁷ forced displacement of Tribal Nations and Native American communities to under-resourced reservation areas inhospitable to traditional farming practices, and assimilation programs such as the allotment period which entailed dividing up a collectively-held land base into individual parcels resulting in dramatic reductions in Native land holdings and termination of Tribal sovereignty. In Hawai'i, decades of American colonization that suppressed language and cultural practices preceded the illegal overthrow of the sovereign Hawaiian government. Banning the Hawaiian language in schools directly contributed to its decline (Wilson 2014). In the Pacific territories, the imposition of English as the dominant language in education and governance has led to the erosion of traditional languages over generations. In Alaska, the United States displaced Alaska Natives to gain access to natural resources, like oil and gold, and significantly disrupted traditional subsistence economies, like whaling and salmon fishing by driving them close to extinction. These cumulative efforts, designed to destroy the continuation of communal living, kinship structures, cultural identity, and language use have all led to a significant decline in the use of Native languages. The ongoing trauma of language loss as felt by all Indigenous communities persists today, and sows collective suspicion around federal data collection efforts such as these, with concerns about how the data may be used to further eradicate Native people, cultural heritage, traditional knowledge systems, family structures, and community well-being (Birney et al. 2019; Gantt n.d.; Lawson 2013; Meza 2015). Historical discrimination and societal perceptions have stigmatized Native languages, further accelerating language loss (Birney et al. 2019).

Federal policies have led to noticeable cultural shifts in which generations over time have prioritized dominant languages to access educational and economic opportunities. This has contributed to the decline of Native languages because they are seen as less practical for daily life. Further, language revitalization is intertwined with the preservation of cultural practices, histories, and identities. As these practices diminish for related reasons, the use of the associated language also declines (Gantt n.d.). Many Native languages are spoken by a small or declining number of people, often within a single community, or even a single family. This small speaker base makes the language particularly vulnerable to language loss, as there might be too few people to transmit the language to future generations. Relatedly, generational shifts regarding passing language down from older to younger generations, whether due to perceived lack of usefulness or threat of discrimination or stigma, can

⁷ More information on Native American boarding schools can be found in the Department of the Interior's Federal Indian Boarding School Initiative Investigative Report at https://www.bia.gov/sites/default/files/dup/inline-files/bsi_investigative_report_may_2022_508.pdf.

threaten the survival of a language. Furthermore, the COVID-19 pandemic disproportionately affected Tribal Nations and Native American language communities, especially Elders, who often serve as primary language speakers and cultural knowledge bearers (Centers for Disease Control and Prevention 2020).

Tribal Nations, Native American language communities, linguists, educators, community leaders, and activists have made concerted efforts to revitalize endangered languages (Lutz n.d.). Community collaboration, a return to honoring Indigenous ways of knowing, and reestablishing or strengthening intergenerational linguistic and cultural transmission form the basis of current revitalization efforts (Hinton 2013). These efforts often involve creating language-learning materials, establishing immersion programs, documenting linguistic knowledge, and fostering language use within daily life and cultural activities (Hinton 2013). Immersion programs, language nests (immersion preschools where children learn the language from Elders), and intergenerational learning spaces have emerged as vibrant threads of revival (Hinton 2013; Paskus 2013). In Hawaii, the Hawaiian language revitalization movement has made significant strides, with the establishment of Hawaiian language immersion schools and initiatives to integrate the language into various aspects of daily life. Communities have embraced technology in innovative ways to create interactive language apps, online courses, and multimedia resources that engage learners across generations and outside their home territory (Brinklow 2021). Collaborations with linguists and educators have fostered collaborative relationships in which linguistic expertise merges with community-driven wisdom (Bischoff et al. 2018).

A national survey on the status of all Native American languages could provide several benefits to current language revitalization efforts. The survey could provide communities with a realistic picture of their language situation. It could aid in understanding the extent of language endangerment and plan for future revitalization initiatives. For Tribal Nations and Native American language communities that have already created strategic plans, this survey could serve as an additional tool to reassess and restrategize language revitalization goals and efforts every five years. It is imperative that the survey administration process should emphasize building relationships and trust as primary goals. Numerous collaborators on this survey effort stressed the critical importance of using existing networks to build trust and exploring ways to maximize the utility of collected data beyond immediate survey objectives. One way they suggested doing so was by aligning the questions asked in the survey with requirements for grants and other funding opportunities so that communities can use data collected for the survey in those applications.

On the federal level, this survey will help identify unmet needs that Tribal Nations and Native American language communities face in revitalizing and sustaining their languages and identify interagency issues and inefficiencies that create barriers to access funding and support. As outlined in the Native American Languages Act of 1990, "It is the policy of the United States to preserve, protect, and promote the rights and freedom of Native Americans to use, practice, and develop Native American languages." If a study were to compare the amount of Congressional appropriations spent on eradicating Native languages versus supporting Native language revitalization, the disparity would be vast (Yamane and Phillips 2022). This survey will serve as a commitment to this form of redress, and we will approach it emphasizing the nation-to-nation relationship between the United States and Tribal Nations, as outlined in nearly 400 treaties.

III. Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey

Community input highlight

Community input across several engagements emphasized that Tribal Nations and Native American language communities are diverse, and language preservation, use, and maintenance efforts are highly contextual to each Nation and community. Language preservation efforts in a single Nation or community may be supported by multiple organizations. Additionally, some organizations may support multiple Nations and communities in their language efforts. ▲

In this section, we describe how to create a comprehensive list of entities that reflects Tribal Nations and Native American language communities. Covering all entities that are eligible to participate is critical in producing a fuller picture of Native American languages. In this section, we define what type of entities to invite to participate in the national survey and how to identify a complete list of those entities. **We estimate a minimum of 760 entities** (Tribal Nations and Native American language communities, Exhibit III.1) **will be part of the national survey; however, we outline work the future survey**

team will need to conduct to determine the final number (discussed in more detail further in this section). Because the level of representation reported in the survey is at the Tribal Nation or community level, we will also describe the process of identifying community representatives in Section V (*Recommendation for Additional Design Preparation to Finalize Content and Procedures for Successful National Implementation*).

Exhibit III.1. Estimated counts of Tribal Nations and Native American language communities

Type of Entity	Count
Federally recognized Tribal Nations	574
State recognized Tribal Nations	66
Alaska Native Corporations	13
Native Hawaiian and Pacific Islander language communities	10
Additional Native American language communities	At least 100
Estimated total number of entities	Minimum of 760

Identifying Tribal Nations and Native American language communities requires a thoughtful and thorough approach.

What is needed: Identify a comprehensive list of Native American language communities that have an organizational infrastructure and connection to a Tribal Nation or Native American community.

What it means for national implementation: Covering all entities that are eligible to participate results in a fuller picture of Native American languages. This phase will require 6 to 12 months.

Phase: Identifying entities

Key Activities:

- Design and construct a database for gathering eligible entities
- Populating the database with known eligible entities
- Outreach to identified Tribal Nations and Native American language communities to determine if there are additional language communities that they are aware of and that are not yet included
- Confirming that the list is comprehensive from a linguistic perspective
- Deduplicating entities before data collection
- Identifying Tribal Nation or Native American language community contacts

Timeline Factors:

- The list of entities will be built before survey outreach
- As a result of outreach, the list of entities will be refined and amended, including adding language communities
- Deduplication should occur before the start of data collection ▲

A. Defining language community

In keeping with the Durbin Feeling Native Languages Act of 2022 and to achieve a comprehensive landscape of the status of Native American languages within Tribal Nation and Native American language community settings, we first must define what type of language communities we should invite to participate. The Durbin Feeling Native Languages Act of 2022 references (1) Tribes and (2) Native American language communities that can be interpreted as a community interested in doing language revitalization efforts, even if not engaged in language revitalization efforts (as an unmet need).

The Durbin Feeling Native Languages Act of 2022 also makes clear the survey should focus on connection to a Tribal Nation or Native American language community as compared to groups of individuals with no community connections but who have an interest and engagement in language acquisition. This definition excludes language learners without a connection to a community, such as those learning through an education app, and excludes language learners without organizational structure, such as independent individual learning. We provide a definition of Native American language community in Box III.1.

Box III.1. What is a Native American language community?

A Native American language community is a group of people with a shared identity or interest who come together to learn, communicate, collaborate, and share resources. A language community must have two characteristics:

- (1) a governance or organizational infrastructure and
- (2) a connection to at least one Native American community. ▲

B. Creating a comprehensive list of language communities

Tribal Nations are the foundation of the comprehensive list of language communities. A comprehensive list also needs to include other entities that meet the legislation's definition of Native American language communities, including Native Hawaiian and Pacific Islander language communities. Because no single list of these entities exists, the future survey team will need to build a comprehensive list that reflects all Tribal Nations and Native American language communities. What follows is a road map for future efforts by the future survey team to construct a list of eligible entities.⁸

1. Tribal Nations

We take an expansive view of Tribal Nations and include federally recognized, state-recognized Tribal Nations, and Alaska Native Corporations (ANCs). Across Tribal Nations and ANCs, the national survey could include about 653 Native American language communities. Constructing the comprehensive list for this endeavor starts with Tribal Nations, and we recommend including three sources:

1. All federally recognized Tribal Nations as defined by the Bureau of Indian Affairs (BIA); there are currently 574 federally recognized Tribal Nations as of January 8, 2024.^{9, 10}
2. All Tribal Nations recognized by states; 13 states currently have state-recognized Tribal Nations, and within these states there are a total of 66 state-recognized Tribal Nations. Of the 13 states, five (Delaware, Georgia, Maryland, New Jersey, and Vermont) have only state-recognized Tribal Nations; the rest have a mix of federally and state-recognized Tribal Nations (National Conference of State Legislatures 2020).¹¹
3. Like Tribal Nations, it is important to specifically include ANCs as a source of Native American language community organizations. The [Alaska Native Claims Settlement Act](#) enacted in 1971 created 12 Alaska Native regional private, for-profit corporations owned by Alaska Native "shareholders." The 13th corporation consists of Native Alaskans who do not reside in Alaska and is in Seattle, Washington. All ANCs can participate in Tribal 8(a) programs, and federal government terms often equate ANCs to Tribal Nation governments.

Exhibit III.2 shows a map of all states and Pacific Island territories and indicates the presence of federally recognized Tribal Nations, state-recognized Tribal Nations, federal and state recognition, or no recognition (see Appendix B.1 for a list of the number of Tribal Nations, by state). For example, Arizona has only federally recognized Tribal Nations, Georgia has only state recognized Tribal Nations, New York has both federal and state recognized Tribal Nations, and Hawaii has no recognized Tribal Nations. This

⁸ The future survey team will need to design a database that can document and track all Native American language communities and potentially document connections between and among communities, such as in a relational database.

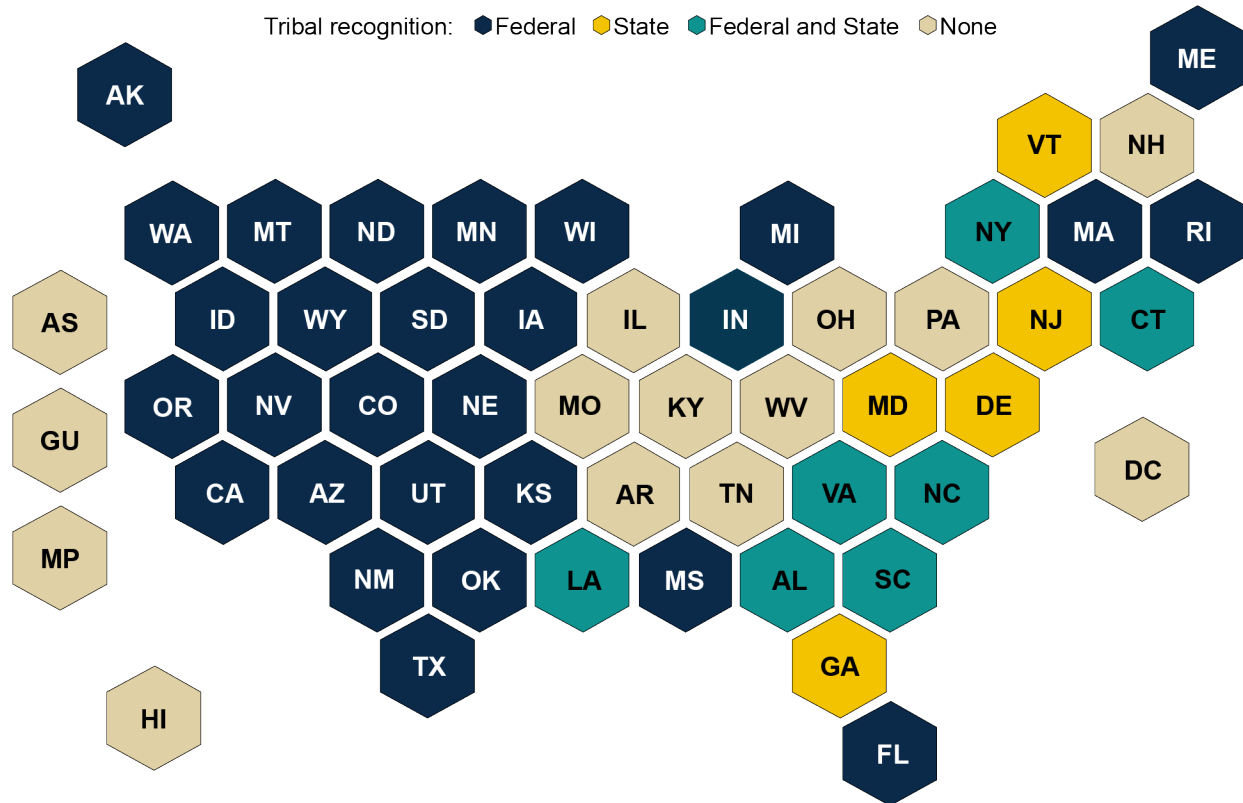
⁹ We recommend using the [Bureau of Indian Affairs: Tribal Leadership Directory](#).

¹⁰ We do not include communities that have submitted a letter of intent to petition for federal recognition, which currently number more than 400. The intent letter varies in what is documented and does not have a clear connection to the proposed definition of Native American language communities for those interested in or conducting language revitalization efforts.

¹¹ We recommend that future efforts should include visiting official state websites where state recognition exists to support comprehensive list building. See appendix B.1 for a list of the number of Tribal Nations, by state.

map demonstrates that relying on Tribal Nations alone will miss communities where Native American language efforts are happening.

Exhibit III.2. Presence of federal and state recognition of Tribal Nations in states and Pacific Island territories



AS=American Samoa, GU=Guam, MP=Northern Mariana Islands

Source: National Conference of State Legislatures 2020. Accessed April 4, 2024

2. Native Hawaiian and Pacific Islander language communities

Native Hawaiian and Pacific Islander groups include (1) Hawaiians in Hawaii and in the Hawaiian diaspora; (2) Samoans in American Samoa and the Samoan diaspora; (3) Chamorus (Chamorros) in Guam, the Northern Mariana Islands, and the diaspora; (4) Saipan Carolinians in the Northern Mariana Islands and the diaspora; and 5) a small community of Tokelauans with ancestral connections to Swains Island. The future survey team will identify Native Hawaiian and Pacific Islander language communities differently because there are no Tribal organizations to speak for the community. Members of the CWG provided about a dozen examples of Native Hawaiian and Pacific Islander language communities.

- For Native Hawaiian language communities, entities could include *Hawaiian language college Ka Haka 'Ula O Ke'elikōlani; language consortia; the University of Hawaii system; other universities; the Office of Hawaiian Affairs in their role supporting education through Hawaiian language medium and focused charter schools; the Office of Hawaiian Education of the Hawaii Department of Education; Kamehameha Schools, a private school system serving Native Hawaiians; and other private schools serving Native Hawaiians.*

- For Samoan communities, representatives could include *American Samoa Community College and the American Samoa Department of Education*.
- For Chamorus, representatives could include the *Chamorro Language Commission; Chief Hurao Academy, a Chamoru immersion school in Guam; and the Guam Department of Education*.

In addition, because 46.7 percent of Native Hawaiians do not live in Hawaii (U.S. Census Bureau 2023), language communities can exist on the continental U.S. And like Native Hawaiians, there are large populations of Chamorus, Samoans, and Saipan Carolinians, outside their islands, particularly in Arkansas, California, Hawaii, Nevada, Texas, Utah, and Washington. Many of these Native Hawaiians and Pacific Islanders have developed organizations to maintain their cultures and languages. To complete the list of language communities, the listing process should include a process that identifies Native Hawaiian and Pacific Islander language communities outside their traditional or current territories. The process should identify trusted leaders in the communities who could identify language communities that meet the definition outlined earlier (Box III.1).

3. Additional Native American language communities

Beyond Tribal Nations and Native Hawaiian and Pacific Islander language communities, other organizations could have representatives or could identify potential representatives of Native American language communities. We estimate a minimum of 100 language communities beyond Tribal Nations and Native Hawaiian and Pacific Islander language communities.¹²

There are 24 regional **Inter-Tribal Councils** that could coordinate language communities or work as an organizer of language communities' efforts (National Congress of American Indians 2020; see Appendix B.2).

Urban Indian organizations (UIOs), nonprofit organizations located in urban centers are another possible source of connection to Native American language communities. Some of these centers administer urban Indian health program and related activities. According to the 2020 Census, 87 percent of those who identify as American Indian or Alaskan Native alone or in combination live outside of Tribal statistical areas. Therefore, the 41 UIOs, which are in 22 states throughout the U.S., could be an important source to identify language communities outside of reservations and other trust lands. Some of these centers, as well as additional urban-based nonprofit organizations that do not administer urban Indian health programs, offer program services more broadly to Indigenous-identified individuals, including Native Hawaiians and Pacific Islanders. These organizations could also be included in the list of eligible entities.

We also recommend including formal language programs offered by **Tribal colleges and universities (TCUs)**. TCUs are both integral and essential to their communities, creating environments that foster American Indian culture, languages, and traditions. TCU Native language programs are in the communities where people speak these languages. There are 32 fully accredited TCUs, with one formal candidate for accreditation. Located mainly in the Midwest and Southwest, TCUs service about 30,000 full-

¹² 24 regional Inter-Tribal Councils, 41 Urban Indian organizations, 32 fully accredited Tribal colleges and universities (TCUs), with one formal candidate for accreditation, and several non-TCU colleges and universities.

and part-time students. According to fall 2010 enrollment data, 8.7 percent of Native college students were attending one of the 32 accredited TCUs. Native students composed 79.1 percent of the combined total enrollment of these institutions (Integrated Postsecondary Education Data System, 2023). Similarly, some **non-TCUs** might also have language programs that are consistent with our definition of a language community, such as the University of Alaska, the University of Hawaii, and Northeastern State University. The future survey team should evaluate and include these institutions on a case-by-case basis.

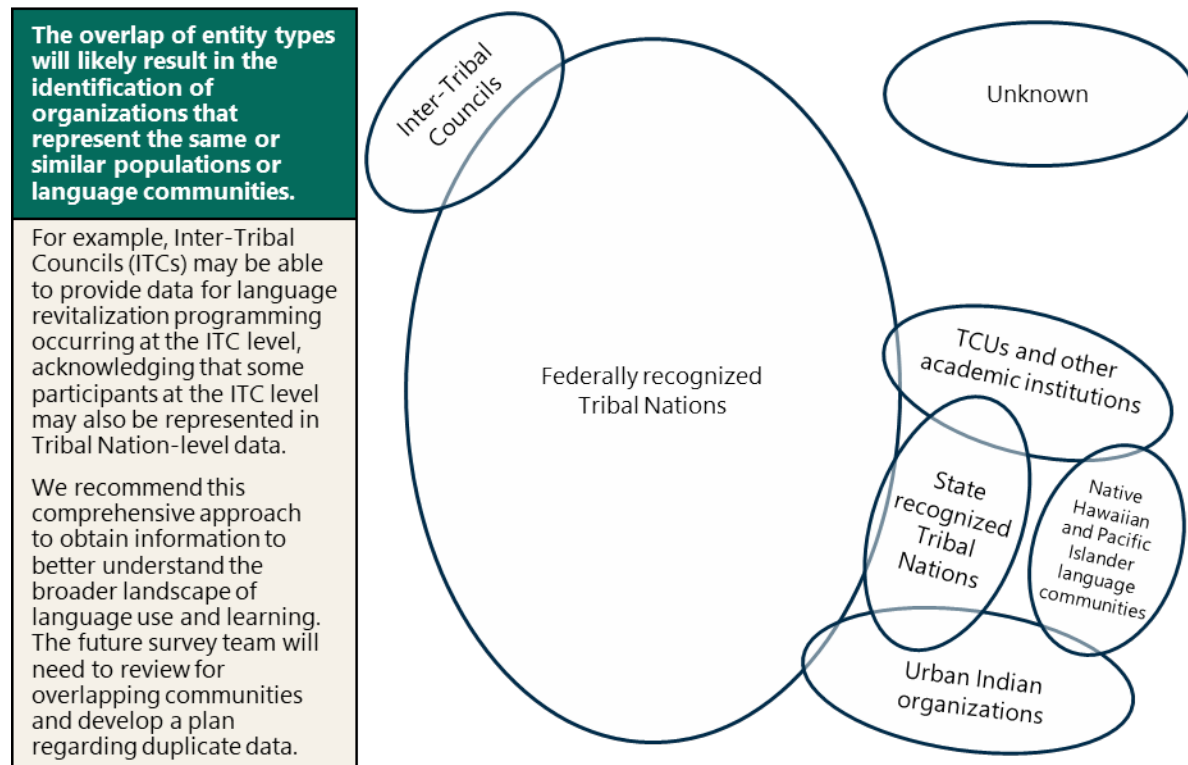
Although likely covered by sources described elsewhere, ***any list of possible language communities should include Tribal Nations and Native American language communities that have applied to ANA or are receiving ANA technical assistance (TA) for language immersion, revitalization, and maintenance and social and economic development projects.*** These Native American language communities are active, engaged language communities, and the future survey team should be certain to include them.

3. Dealing with overlapping communities and deduplicating

The previously described listing process will likely identify organizations that represent the same or similar populations or language communities. For example, Inter-Tribal Councils (ITCs) might be able to provide data for language revitalization programming occurring at the ITC level, acknowledging that Tribal-level data might also represent some participants at the ITC level. We recommend this comprehensive approach to obtain information to better understand the broader landscape of language use and learning. However, the list that is employed by the future survey team for the survey should ideally contain only one entity for each language community. Before collecting data, the future survey team should attempt to remove duplicates of an entity (that is, deduplicate), using the available contact data to the extent possible. After data collection, we recommend developing processes to manage any remaining multiple responses from essentially the same entity and create decision rules for combining data or developing other techniques for reporting, such as multiplicity weights.

4. Maximizing language community coverage

The lists and sources of language communities outlined before might still not be comprehensive of all Native American language communities (Exhibit III.3). Therefore, the listing process should include outreach to identified Tribal Nations and Native American language communities to determine if there are other language communities that they are aware of and that are not yet included. The listing process could ask Tribal and community leaders “Who are your neighbor Tribal Nations that are not yet acknowledged? Who are your neighbors working on language revitalization efforts or language education?” This outreach effort will increase the coverage of all language communities. Further, it will engage Tribal Nations in the effort to locate language communities, provide transparency to the process for location, and could build cooperation and trust in the data collection efforts to follow. Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*) elaborates on this topic.

Exhibit III.3. Populations for the survey

Note: The size of the ovals represents the approximate relative known sizes of each group (not to exact scale) and the way each of the populations overlap.

5. Listing process learning oriented approach

Finally, we recommend a step to confirm that the list is comprehensive from a linguistic perspective. CWG members recommended comparing a list of North American Native languages to the list of Tribal Nations and Native American language communities developed using the process described earlier. Ethnologue¹³ is a source of languages of the world and maintains a list of North American Native and Pacific Islander languages. Comparing to Ethnologue evaluates the coverage of all possible languages and could expose languages without a previously identified language community. If a language without an identified Tribal Nation or Native American language community is discovered, then we recommend additional engagement, outreach, and networking to identify if a Tribal Nation or Native American language community can report on the language.

We recommend that the process of listing be an ongoing effort to improve quality and coverage. After the survey is complete, we recommend that the future survey team include a process of evaluating the listing for coverage, accuracy, completeness of contact, and other information, and identifying limitations

¹³ Ethnologue (<https://www.ethnologue.com/>) is a catalog of the 'metadata' of language—information about how languages are used around the world, who uses them, where and for what purpose. Ethnologue is a trusted reference work on the language ecologies of the world, utilized across a broad range of disciplines and serving universities, nonprofit organizations, government agencies, and commercial companies.

of the listing, including timeliness. This evaluation should also describe how to update the listing process for future surveys.

C. Identifying Tribal Nation or Native American language community contacts

As part of the listing process, the future survey team will document the Tribal Nation or Native American language community leaders to begin the engagement process. The federally recognized Tribal Nations have a list to begin that outreach and confirmation of the current government leadership. State-recognized Tribal Nations have points of contact noted on websites. For Native American language communities, organization websites may provide contacts. Indian Health Boards and Tribal Epidemiology Centers have connection with communities that could allow for the identification of representatives. ANA also has information for grant applicants and TA recipients. ANA can make this information available to a future survey team to identify the appropriate contacts. For any entity, these contacts reflect the leadership that will determine the review and approval process needed. As described next in Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), this process reflects the data sovereignty and self-determination of Tribal Nations and Native American language communities. The representative who might complete the survey will still have to ensure appropriate review by their Tribal Nation or Native American language community entity. Section IV also describes the process of identifying the representatives who will complete the survey among participating entities.

IV. How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey

Community input highlight

Community input across several engagements pointed out that federal policies aimed at eradicating Native people—such as boarding schools, forced displacement, and assimilation programs—caused a significant decline in language usage. Survey efforts must be respectful, include authentic engagement from Native communities, and appreciate the urgency and complexity of Native language preservation.

In this section, we describe the overarching principles of sovereignty and self-determination that should guide the process of engaging Tribal Nations and Native American language communities in a national survey. Tribal Nations are sovereign and have jurisdiction over activities conducted in their communities and with their citizens. Native American language communities are self-determining and have the right to make decisions about their communities and community members. Both Tribal Nations and Native American

language communities have the right to decide if and how data are collected in their community and what happens with the data. Tribal Nations and Native American language communities will have different requirements and protocols for allowing the study to collect data from their citizens and community members. Upholding sovereignty, self-determination, and the rights of Tribal Nations and Native

Respectful engagement with Nations and communities requires several modes of continuing engagement.

What is needed: Elevation of sovereignty and self-determination to establish clear, transparent, and mutually agreed upon protocols for data collection, management, and future use.

What it means for national implementation: Creating awareness, establishing relationships, and sustaining trust necessitate patience, flexibility, and time. This phase will require 6 to 12 months for outreach before engaging in review and approvals for 6 to 24 months. ▲

Phase: Respectful engagement

Key Activities:

- Raise awareness of the survey through widespread advanced outreach
- Identify appropriate representative(s) and make initial contact
- Learn what is required for local research review and approval and conduct Tribal consultation
- Deepen trust and relationship building through ongoing engagement
- Establish an agreement to collaborate on the survey (Agreement to Participate Pillar)
- Complete the requirements for local research review and approval (Local Research Review Pillar)
- Form a data stewardship committee (Data Stewardship Committee Pillar)

Timeline Factors:

- While we have provided estimates, the time required for these activities will be variable
- The Agreement to Participate, Local Research Review and Data Stewardship Committee Pillars should be in place before data collection begins

American language communities to determine if and how we can collect, store, manage, access and use data in the future will be critical for respectful engagement and achieving the goals of this national survey. The future survey team administering this survey should operate under this guiding principle throughout the project.

A. Key considerations and insights into respectful and ongoing engagement

Continuation of the Community Working Group (CWG)

We propose that the existing CWG, whose members have served as invaluable partners throughout the survey development and design process, be invited to continue to play a role in providing oversight and guidance on respectful research engagement practices, community assurances, and outreach strategy. Additional outreach and invitations to new members could also occur depending on which existing CWG members decide to continue their participation and those that do not. Moving forward, the CWG should serve as an essential conduit between ANA and Tribal Nations and Native American language communities, ensuring respectful research engagement practices, community assurances, and an outreach strategy guide the work.

Respectful engagement in research practices. The CWG will offer insights into best practices for engaging with Tribal Nations and Native American language communities, including approaches to building trust, honoring cultural protocols (such as opening spaces with prayer and prioritizing Elders in physical spaces and conversations), providing resources to facilitate supportive data collection activities (such as referral to resources and support groups given the sensitive nature of the data to be collected) and fostering meaningful partnerships. Their input will help ensure the future survey team conducts research activities in a manner that prioritizes community needs and preferences.

Develop and communicate community assurances. The CWG will help develop and communicate assurances to communities regarding data confidentiality and the use of survey findings. By working closely with the CWG, ACF can address community concerns and provide reassurances that we will respect their rights and interests throughout the survey process.

Develop an outreach strategy. The CWG will collaborate on developing an outreach strategy that effectively reaches and engages the diverse Tribal Nations and Native American language communities. Each stage of the survey administration process should consider their knowledge of local contexts, communication channels, and community dynamics.

B. Establishing three essential pillars for respectfully engaging with Tribal Nations and Native American language communities

In this section, we outline **three essential pillars for respectfully engaging with Tribal Nations and Native American language communities**: (1) establishing an agreement to participate in the survey between the Nation or community and the federal government, (2) ensuring local research review entities have approved the protocol for survey administration, and (3) establishing a data stewardship committee to advise on and guide all aspects of data use, interpretation, and dissemination of findings. We describe the pillars, key steps to follow, and considerations to plan survey administration relative to each pillar.

Pillar 1. Agreement to participate (6-12 months)

The purpose of establishing an agreement of participation between the Tribal Nation or Native American language community and the federal government is to clearly state the roles and responsibilities of each involved party. The agreement should be specific regarding what each party agrees to as part of the collaborative data collection effort. To uphold the principle of sovereignty, an agreement of participation should delineate rules around all aspects of data management, such as collection, storage, analysis, and future access. The process to develop the agreement should be flexible and allow tailoring to the needs of and any necessary assurances required by the community. For example, a Tribal Nation might agree to participate only if it receives its data after the study, or it might require redacting its data from the national data set after analysis is complete. Another consideration for developing an agreement of participation is the time needed for both federal interests and Tribal Councils to provide input into the agreement. A relevant example for consideration is an agreement of collaboration developed by the American Indian and Alaska Native Head Start Family and Child Experiences Survey study team between Mathematica and each participating Region XI Head Start program (Appendix C).

The process to develop an agreement of participation begins with raising awareness of the survey and conducting initial outreach and connection with communities. Although this process will vary in specific requirements and the time needed, following these two key steps will be essential for upholding the value of sovereignty in this pillar of work.

- *Raise awareness.* A first step will be to raise awareness of the survey efforts by conducting advanced outreach to Tribal communities and organizations serving Tribal communities. This will include identifying opportunities to present and discuss the survey and data collection efforts at various venues and events. Considerations for presenting information about the survey could include at ACF Tribal consultations, HHS Secretary's Tribal Advisory Committee, ACF Tribal Advisory Committee, survey information webinars hosted through ANA, grant recipient meetings, and conferences hosted by national and regional organizations working on behalf of Tribal communities such as the National Indian Health Board and the National Congress of American Indians. The future survey team could develop an informational sheet that describes the survey and distribute it at these events and discussion groups hosted to answer questions. The output from this step will raise awareness of the survey across communities and organizations at a national level.
- *Conduct outreach and make initial connections.* A second step will be to identify the appropriate representatives for the community and make initial connection. The future survey team can begin by contacting those listed on the relevant community list, such as the BIA list for federally recognized Tribal Nations, state government websites listing state-recognized Tribal Nations, state lists, or organization websites. The future survey team can also connect with the organizations listed in subsection III.B (within Section III, *Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*) to identify appropriate community representatives. The team should make connection via multiple sources, including email, phone calls, and secondary contacts; the future survey team should anticipate needing multiple follow-ups as posted lists might not be up to date). During outreach and initial connection, the future survey team should be prepared to do the following:

1. Acknowledge that exploitation, cultural insensitivity, and the collection of sacred recordings and texts without permission have characterized the history of research and data collection of Native American languages.
2. Describe the survey in detail, including that it will not collect any form of document, recording, or language text, nor will it collect culturally sensitive information or intellectual property. To reiterate, the survey's goal is to gather information about the language use, language learning, and unmet needs in the community.
The output from this step will be to build trust and relationships with communities that will set an important foundation for continued engagement necessary for survey administration.

Pillar 2. Local research review (6-24 months)

The second pillar is to learn about and follow all local research review requirements needed to administer the survey. Some communities will require review of the research protocol from an institutional review board (IRB), either their own or an oversight IRB to which they defer (this may be the IRB of a TCU or another University with which the community partners on research endeavors). Research projects conducted at IHS facilities serving a Tribal Nation that has its own IRB must have the approval of both the Tribal IRB and the IHS IRB (either national or the respective Area Office IRB). For example, in the Head Start Health Managers Descriptive Study, both the IHS national and all Area Office IRBs conducted the review. Research conducted at IHS facilities managed by Tribal Nations with their own IRB and federal-wide assurance require approval of only the Tribal IRB. Protocols approved by Tribal Research Review Committees that do not meet the formal requirements of 45 CFR 46 for an IRB should also be forwarded to the IHS IRB for approval. This generally takes the place of the Council Resolution or approval letter from an authorized Tribal health official that would ordinarily be required. Some Tribal IRBs serve a dual role as both a Tribal IRB and an IHS Area Office IRB (such as Navajo Nation's IRB).

Some Tribal Nations and Native American language communities might require review by multiple entities (for example an IRB plus other local entities). Examples of local entities that can conduct research review and approval include Tribal Councils, Tribal Advisory Boards, Tribal attorneys, and regional health boards. ANA will have to determine what local research review requires, including the following considerations:

- What materials are required in addition to the research protocol and accompanying research-related documents, such as letters of support or certificates of confidentiality?
- Who will be the local representative for the research protocol? Some Tribal governing bodies require Tribal members to present requests for approval, whereas others require the principal investigator to be a member of the local community.
- What is the process for seeking local research review? Some Tribal governing bodies and Tribal IRBs require a sequence of prior approvals before they can issue a final approval. For example, the Navajo IRB requires review and approval by local chapter houses (which meet bimonthly) and regional agency councils (which meet quarterly) before review and approval by the IRB can occur.
- What is a typical timeline for local research review and what challenges might ANA anticipate during the process? Sometimes local entities cannot achieve a quorum and have to postpone meetings for months, especially during election cycles.

Conduct ongoing engagement. After making an initial connection, the future survey team will work to develop their relationship with the community and gain a deeper understanding of what the local research review will require. This could include traveling to the community to engage in learning conversations to discuss the community's thoughts and preferences around the topics covered in the survey. Conversations will likely include how the government will use the data and how the results from the survey will directly benefit the community. The future survey team could also conduct ongoing engagement by meeting with Tribal leadership, representatives of the Tribal Nation's IRB, and attending meetings of local research review entities as an observer. The future survey team will discuss with the government which communities they will travel to for ongoing engagement activities; this decision will likely vary by community and be based on the quality and frequency of prior communications, requirements of local research review, community location and available resources.

The process to determine what is necessary for local research review will vary in specific requirements, time needed and the extent to which in-person travel to the community is necessary (for example some IRBs meet virtually whereas others require in-person participation). Not all entities will require an in-depth local research review process; some entities, such as UIOs or ITCs might be able to respond to the survey without these processes. There is great variability in the needs between and among Tribal Nations and Native American language communities, which is one reason a field test is a strategic first iteration of survey administration (discussed further in Section V, *Recommendation for Additional Design Preparation to Finalize Content and Procedures for Successful National Implementation*). To uphold Tribal sovereignty, the future survey team should seek local research review approval in parallel with OMB clearance required for administration of the national survey. The future survey team will learn about what is required for local research review through outreach, initial connection and ongoing engagement activities as well as through formal Tribal consultation as mandated by the Durbin Feeling Native Languages Act of 2022.

Pillar 3. Forming a data stewardship committee (throughout life of project)

As mandated in the Durbin Feeling Native Languages Act of 2022, a report will compile the results of the survey to share with Congress. The study will not publicly share the data collected—that is, the information and estimates reported by specific Tribal Nations or Native American language communities; rather, the future survey team will incorporate the results into a summary. For example, the summarized results might say, "Of the Tribal Nations and Native American language communities that responded, [##] percent reported having a language immersion program for pre-K students." To ensure this process is respectful and upholds the principle of sovereignty, the third pillar of work is to form the data stewardship committee, whose purpose is to ensure the Tribal Nations and Native American language communities that participate in the survey maintain ownership and stewardship of their own data now and in the future. The committee will put the needs and assets of the participating communities at the forefront and operate in a manner informed by the impact of colonization on Native languages and guided by Tribal participatory research approaches. Other federal data collection efforts have modeled this best practice, and it is central to ACF's road map for collaborative and effective evaluation in Tribal communities (Tribal Evaluation Workgroup 2013).

Ongoing input of the data stewardship committee ensures ACF applies a clear and transparent process to decisions made about data use, including developing an agreement of participation, interpreting,

protecting and sharing data, secondary data analysis, creating a data repository, how the future survey team will directly consult participating communities on the results, and how the final report will present findings and be disseminated with the public. The data stewardship committee will also be critical to navigating decisions around issues and complications with the data collection efforts. Examples of this include if communities want to revoke their data after it has been collected, or if a language community doesn't get along with the Tribal government/language program and one entity wants to participate but the other doesn't. The data stewardship committee will ensure that both anticipated and unforeseen challenges will be addressed in a way that upholds Tribal sovereignty and the best interests of participating entities. The committee will also advise on how the data is interpreted during the analysis phase as well as how it is communicated and shared (discussed further in Section VIII, *What Are the Considerations and Ways for Communicating and Sharing Findings?*).

ANA will consider several steps in forming the committee, including (1) who will establish and operate the committee, (2) how many members should it comprise, (3) what kind of representation is critical to advise on data use, (4) how to identify members, and (5) if committee members will receive compensation for their engagement. ANA could consider forming a working group to advise on the formation and operation of this committee. Because the committee is not already in place, current federal plans do not include archiving data for secondary analysis.

Establishing data access agreements. The committee will work with the government to determine if others outside of the future survey team conducting the survey will be provided access to the data. If the government and committee agree that is the case, the committee will establish clear protocols and guidelines for their unique access and responsibilities, included but not limited to storing, sharing, and using survey data. These protocols will prioritize protecting Indigenous knowledge and respecting Tribal sovereignty. The committee will also collaborate with Tribal Nations and Native American language community representatives to develop data access agreements that prioritize community needs and preferences. These agreements will outline the terms and conditions for accessing survey data, including provisions for cultural protocols and data sovereignty.

Advising on transparency around future data linkages. The decision not to make the first administration of the survey available in a data set for secondary analysis acknowledges the sensitive nature of the data collected and the need to prioritize community trust and confidentiality. However, it is essential to plan for the five-year cycle of survey administrations and consider the implications and challenges associated with revisiting communities for additional data collection.

V. Recommendation for Additional Design Preparation to Finalize Content and Procedures for Successful National Implementation

Community input highlight

Language is a repository for cultural heritage, which acts as a safeguard for that community's wisdom, worldview, and identity. Therefore, survey efforts, including content, administration, and Nation and community engagement approaches, should clearly explain how data obtained from the survey will be analyzed and used by the federal government. ▲

As this is a diverse population, design preparation efforts should ensure the survey content and administration procedures work for as many Tribal Nations and Native American language communities as possible for a successful national implementation of the voluntary survey. Following a learning-oriented approach, we propose two activities to continue the survey and design development needed to learn from experience to improve this survey effort. The first phase is a

survey instrument pretest of the draft survey, which was developed based on public comment to an item set, to improve wording clarity and understand the burden associated with completing the survey. The second phase, once a refined survey is ready, will be an operational field test to better understand the timeline and level of effort needed to conduct the survey activities and to build trust with Tribal Nations and Native American language communities. We highlight throughout this plan activities that would benefit from field testing—including identifying Nations and communities to invite to the survey, building relationships and trust with Nations and communities to ensure the Agreement to Participate and Local Research Review Pillars can be upheld, continuing survey development, and establishing culturally and scientifically rigorous protocols vetted through the Pillar of a Data Stewardship Committee. In this section, we describe the survey instrument pretest and operation field test (which will be the starting phase of the first national implementation with a smaller set of entities). We outline the potential sample characteristics to include diverse perspectives in this future work, key activities and timeline for a survey instrument pretest and operational field test, and future considerations for designing these testing efforts.

Tribal Nation and Native American language community-defined successful survey administration requires significantly more input and investment before it begins.

What is needed: Iterative process for additional design preparation through a survey instrument pretest (focused on refining items for clarity and cultural and community congruence) followed by an operational field test as part of the start of national implementation with the refined survey. Operational field test to follow full protocol for outreach, entity identification, OMB clearance, local research review, and data collection. Field test experiences will allow an opportunity to build relationships and trust with Nations and communities through the Agreement and Local Research Review Pillars and establish culturally and scientifically rigorous protocols through the Data Stewardship Committee Pillar. Synthesis of field test experiences will inform the remaining national implementation for the first round.

What it means for national implementation: More information is needed on whether the current Congressional timelines and appropriations are sufficient to conduct this survey in a way a significant number of Tribal Nations and Native American language communities would agree to participate. Following best practice, an iterative process with a survey instrument pretest followed by national implementation featuring an operational field test will help to build trust in the survey, identify organization supports needed to participate, and reduce the variability, length of time, and financial investment of respectful outreach and engagement as outlined by Nations and communities in this plan.

Phase: Outreach and entity identification; OMB clearance; Local research review; Data collection

Key Activities:

- Survey instrument pretest: design preparation for survey items to pretest, pretest entity identification (with a purposive sample), generic OMB clearance, outreach and pretesting (through semi-structured interviews), and revisions to survey instrument
- Operational field test: outreach and entity identification (with a smaller set of entities from national implementation), full OMB clearance for field test and full implementation, local research review, data collection (using multimode survey), and synthesis of field test experiences applied to implementation with remaining entities

Timeline Factors:

- Pretest will require 1 year, assuming generic OMB clearance.
- Assuming the five-year survey cycle, an operational field test could serve as first 2-year process for the national implementation, providing opportunities to learn from experiences and improve upon for the remaining years and subsequent rounds of the survey. ▲

A. Precedence and justification for further testing

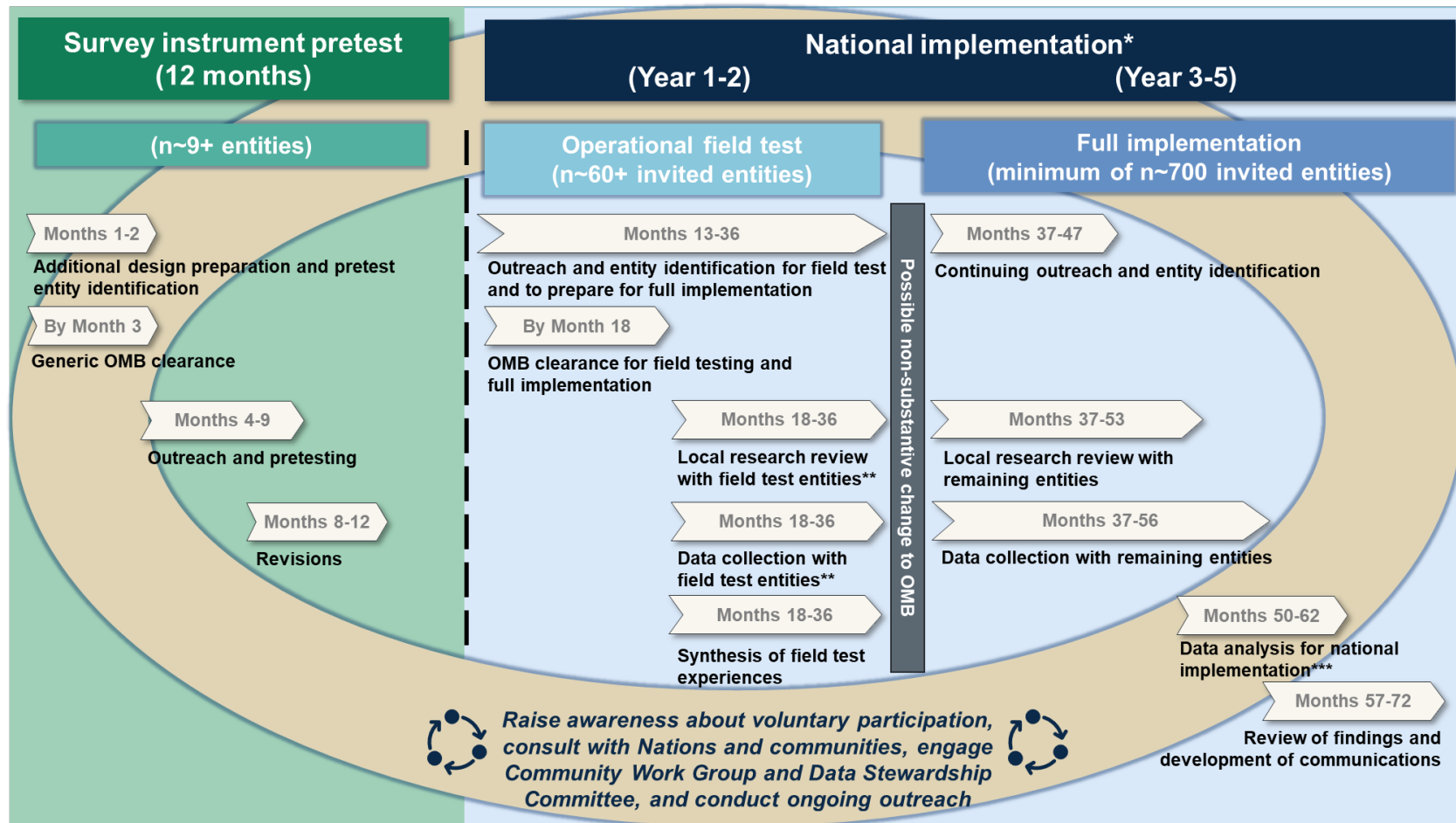
Piloting new instruments or instruments used in other context is a standard research practice. Parallel work in Australia (the National Indigenous Languages Survey [NILS]) followed an iterative process, beginning with a broad scope and field test (NILS1), implementing a national survey with NILS2, and evolving now with NILS4 with deeper community involvement (Australia Institute for Aboriginal and Torres Strait Islander Studies team personal communication 2024; Marmiomi et al. 2014). Lessons shared on this work highlight the need for preliminary testing of instruments and procedures alongside community relationship-building. Within the U.S., early efforts toward a national study of Head Start programs in Region XI (those operated by federally recognized Tribal Nations or consortia of Tribal

Nations) started with piloting of existing instruments used in the Head Start Family and Child Experiences Survey.¹⁴

As a federal effort, testing instruments and procedures before implementation can highlight efforts to maximize the data collection success as part of the review for clearance by OMB. Pretesting activities can ensure newly created or adapted items (from individual to community levels) capture the information to meet the survey's objectives. These activities also can demonstrate community support and engagement for the proposed approaches to collecting data. Exhibit V.1 presents a timeline and overview of key steps for pretesting and field testing as part of the first round of national implementation.

¹⁴ For more information, refer to the work conducted by the American Indian and Alaska Native Head Start Research Center at <https://coloradosph.cuanschutz.edu/research-and-practice/centers-programs/caianh/projects/past-work/aianhsrc#ac-multi-site-region-xi-pilot-study-of-the-family-and-child-experiences-survey-2>. This work informed further design and piloting efforts for the first round of the American Indian and Alaska Native Head Start Family and Child Experiences Survey ([American Indian and Alaska Native Head Start Family and Child Experiences Survey \(AIAN FACES\) | The Administration for Children and Families \(hhs.gov\)](#)).

Exhibit V.1. Potential process timeline of survey preparation and implementation activities for first round of national implementation



* There may be a minimum 760 entities invited to participate in the voluntary data collection for the national implementation.

** Local research reviews and data collection efforts will continue for any field test entities as needed alongside the remaining entities from full implementation.

*** Survey data provided by participants during the field test and full implementation efforts will be combined for analysis and reporting as a single round of data.

B. Purposive sampling for pretest and field test phases

To support learning ahead of full implementation, the pretest and field test phases will focus on a sample of Tribal Nations and Native American language communities purposively selected. Each effort differs in focus—survey content in pretesting versus the full process in field testing—that priorities for the characteristics of the sample will vary to focus on those that might relate to measures of interest (in pretesting) or may affect data collection processes (in field testing). Exhibit V.2 provides an initial list of potential characteristics, whether to consider them for pretest and/or field test efforts, and potential sample sizes. As these characteristics must be known at the time of sample selection, identifying communities will be purposive through existing data sources and working with ANA based on language grant applications.

Exhibit V.2. Potential community characteristics for purposive sampling for survey testing efforts

Community characteristic	Preliminary definition or examples	Pretesting	Field testing
Entity type ^a	Six key types: 1) Tribal Nations for American Indian and Alaska Native (to include Alaska Native Corporations), 2) UIO, 3) ITC, 4) TCU, and 5) Native Hawaiian or Pacific Islander organizations conducting language programs	X At least one participant per entity type	X At least one participant per entity type
Community population size	Identify Nations or communities of varying population sizes using input sources like My Tribal Area from the US Census Bureau		X Monitor for variation
Geographic region location	Up to 12 geographic regions: Alaska, Hawaii and the Pacific Islands, and regional groupings of the 48 contiguous states (see subsection VIII.B)		X At least four participants per region
Language status	Identify Nations or communities from varying language statuses (active language users, no current active users, rebuilding language) using input sources such as the American Community Survey and ANA internal data	X At least two participants per status type	
Language initiatives	Identify Nations and communities with different language initiatives (language programs, immersion schools, departments, centers, and archives)	X At least two participants per initiative type	
Language-learning efforts	Identify different stages of efforts (such as planning, beginning, and continuing) through ANA grant and training and TA requests		X At least one participant per effort type

Note: Participant refers to a Tribal Nation or Native American language community.

^a See Section III (*Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*) for definition of the population by these entity types

ITC = Inter-Tribal Council; TCU = Tribal College or University; UIO = Urban Indian organization.

C. Survey instrument pretest activities

To date, the survey has not been pretested or completed in its current form to confirm inclusiveness and clarity of the wording across the diverse population being invited to complete the survey. A first step, before an operational field test, would be to conduct a **survey instrument pretest** for clarity and learning about the burden required of representatives (to gather data needed, which may exist in various sources or need to be collected, and to complete the survey based on that data). We propose semi-structured interviews with representatives to walk through the survey items and existing data sources. Pretesting can provide information on how respondents interpret items, what words or phrases might be confusing or inappropriate for this survey effort, and which items might also benefit from a more qualitative approach for deeper discussion. Findings from the pretest will inform revisions to the survey and any potential future qualitative case study design work (discussed further in Appendix D).

Additionally, pretesting serves as another opportunity to begin raising awareness about and building trust around the upcoming national implementation effort. Including more voices from different Tribal Nations and Native American language communities in the development and construction of the survey will generate a sense of partnership and collaboration with those entities that participate in the pretest efforts.

1. Purposive sampling for pretest entities

We recommend that the purposive sampling for pretesting considers the sample characteristics described in Exhibit V.2 to bring in diverse perspectives and to navigate through key content in the survey (discussed further in subsection VI.A, within Section VI, *What Topics Does the Survey Cover and How Will the Survey Be Administered?*). We recommend a minimum of nine participants (or entities) for the pretest that include:

- At least one participant who represents each of the six entity types (with additional remaining slots prioritized for Tribal Nations, potentially that differ in other characteristics),
- At least two participants who represent each of the three main language statuses (those with active language users, those without current active users, and those that are in the process of rebuilding their language), and
- At least two participants who represent each type of language initiative that is highlighted in Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*) of the current survey draft (language programs, immersion schools, departments, centers, and archives).

This sampling strategy should allow for all pathways through the survey to be pretested. If the future survey team wishes to further expand the sample, the activities would require OMB clearance, which could possibly be conducted under an ACF generic clearance, if available, as results would not be made public.

2. Key activities for pretest

The pretest focus will be on the survey instrument, requiring design of interview protocols. It will also include entity identification, outreach and pretesting data collection, and review of the results to inform revisions to the survey instrument. Assuming the CWG has already been established (as recommended in

subsection IV.A, within Section IV, *How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), the future survey team will collaborate with the federal partners and the CWG to prepare a semi-structured interview protocol. The future survey team will also need to identify or train staff to facilitate the interviews (discussed further in subsection VII.A, within Section VII, *Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation*). On a rolling basis, the future survey team can work with the federal partners and CWG to identify entities and make connections with potential participants that express interest in supporting the pretest, and work to schedule the interviews. After the interviews are conducted, the future survey team will review and synthesize the information received and work with the federal partners and CWG to apply revisions to the survey.

D. Operational field test activities

With a finalized survey after the pretest, the national implementation would begin with an operational field test to examine the full design protocol—outreach, entity identification, OMB clearance, local research review, and data collection—with a smaller set of entities. Beginning purposively with a smaller number of entities will allow the future survey team to learn more about timelines and needs to ensure a significant number of invited Tribal Nations and Native American language communities are willing and able to participate.

1. Key activities for field test as part of national implementation

This effort would begin with building the list to identify Tribal Nations and Native American language communities. It would also include advance contact and outreach and securing approvals to learn about the assurances needed, protocols, and timelines. Following Tribal Nation and community protocols, these steps are needed before moving to identifying representatives within a community as a potential survey respondent. Implementing data collection procedures will test the survey functionality for communities with multiple respondents or languages, the need for different modes of administration, effort to complete the survey, and the future survey team's follow-up efforts to promote robust response rates. As the beginning of the first round of national implementation, the recommended approaches are discussed in Section VI (*What Topics Does the Survey Cover and How Will the Survey Be Administered?*). The purpose of starting with a smaller set of entities with an operational field test to determine the appropriate time and supports needed reflecting the diversity in entities and variation in capacity in representatives' time and data availability. This effort would require full OMB clearance; we propose ACF obtain clearance for all potential entities to invite for the national implementation upfront to minimize impact on budget and schedule between the operational field test and full implementation. A period of time would be devoted to synthesize the field test experiences to determine any refinements in outreach and data collection approaches (with a potential non-substantive change to OMB if needed). Based on those lessons learned, the future survey team will then continue implementation with the remaining entities (or full implementation).

This effort would begin with building the list to identify Native American language communities in a subset of geographic regions. The future survey team will purposively select a subset of geographic areas that encompass diverse types of Native American language communities. The geographic regions selected should ideally include federally and state-recognized Tribal Nations, TCUs and non-TCUs, and

UIOs, and include one of the Pacific Island territories, as well as potentially identifying Pacific Island communities on the mainland. To evaluate the listing process implementation, the future survey team should select a large enough subset of areas so that the team encounters most of the challenges facing the full study. It is also critical that the future survey team put in sufficient effort to create a comprehensive list of entities by implementing all listing processes (as described in Section III, *Identifying Tribal Nations and Native American Languages to Engage for a National Survey*, above) in the selected geographic regions. The future survey team will need to design a database that can document and track all Tribal Nations and Native American language communities in the field test and potentially document connections between and among communities, such as in a relational database. We recommend that the future survey team include a process of evaluating the listing for coverage, accuracy, completeness of contact, and other information, and identifying limitations of the listing, including timeliness. This evaluation should also describe how to update the listing process and database design for the full study.

Similar to the pretest phase, the future survey team will collaborate with the federal partners and the CWG to finalize outreach and survey materials and procedures for the field test as part of the national implementation. Identifying and training all future survey team staff who will participate in field test activities will need to occur ahead of the field test's launch. Additionally, the future survey team should also prepare tracking documents that allow the team to capture successes and challenges to learn from each step of the fielding effort. Factors to understand include documenting what approvals are needed and how long do they take; what modes field test participants use and where and why they use them; and how long it takes respondents to prepare for and complete the survey, as well as any coordination between respondents if there are multiple for a single participating entity (described further in subsection VI.D, within Section VI, *What Topics Does the Survey Cover and How Will the Survey Be Administered?*). Within the two-year parameter, an operational field test will also inform subsequent rounds of national implementation if longer time is needed for these steps. In the first round of national implementation, local research reviews and data collection efforts will continue for any field test entities as needed alongside the remaining entities invited for full implementation. Survey data provided by participants during the field test and full implementation efforts will be combined for analysis and reporting as a single round of data.

2. Purposively identifying a smaller set of entities to start

To conduct the full scale of survey activities, we recommend beginning with at least 50 Tribal Nations and Native American language communities. The purposive sampling for the field test should differ from pretesting given the focus on building trust and testing operational and logistical procedures. As presented in Exhibit V.2 to ensure a wide range of perspectives, we recommend that the purposive sample includes:

- At least one participant that represents each of the six entity types, acknowledging that there may be 'unknown' types that are identified in the list-building process, and
- At least four participants from each of 12 geographic regions (building on existing ANA TA relationships if possible),
- At least one participating entity that represents each of three language learning efforts (planning, beginning, and continuing).

While not an explicit characteristic for sampling, we propose community population size be varied and monitored by the future survey team. This characteristic may help to understand if there are differences in the capacity and data sources available to complete the survey.

Field test participants will be selected from the list to be built as part of this work. The future survey team can work with the federal partners and CWG to identify and make connections with trusted outreach partners (a role further described in subsection VII.A, within Section VII, *Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation*), who in turn can support the team in identifying potential participants to invite for the field test. As part of the survey outreach, there may be rolling identification of entities (as described in Section III, *Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*) which means that the number of participants could increase (for estimating purposes one could assume one-fifth may identify another community in the list building stage or approximately 10 additional entities for outreach). In following the local review process, if a Tribal Nation or Native American language community chooses not to participate, they will not be replaced for field testing purposes. As part of the national implementation, remaining entities will be invited as part of the full implementation.

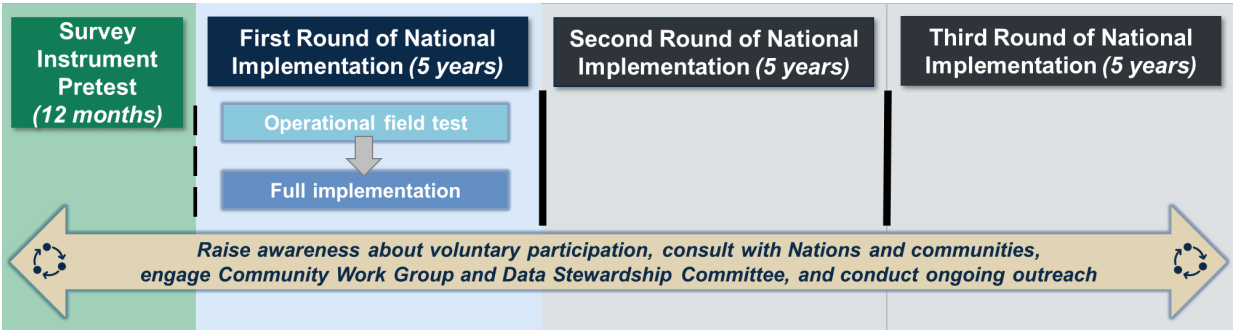
3. Learning from the field test to improve approach for remaining entities

Similar to the pretesting effort, the future survey team should review and synthesize the information learned during the field test—both as it relates to the fielding process and the outreach and survey materials themselves—and work with the federal partners and CWG to apply revisions before the full implementation within the first round.

E. The value of using a learning-oriented approach for continuous improvement

The pretesting and field test are two key activities supporting the first round of national implementation. Throughout these efforts, ANA may continue to raise awareness about the efforts to ensure Native voices are at the forefront of this work and aimed toward benefits for the communities. The lessons learned in the field test will inform how to conduct a census—reaching out to every Tribal Nation and Native American language community—to meet the Durbin Feeling Native Languages Act of 2022 goal. As shown in Exhibit V.3, the first round of the national survey is not the end of the learning. Policy and community needs will change over time. Revisions can be anticipated to both content and approach to improve on lessons learned. The sections that follow present a plan, based on the community input, for what to collect, how to collect it, and how to share what is learned.

Exhibit V.3. Timeline overview for first three rounds of national implementation



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VI. What Topics Does the Survey Cover and How Will the Survey Be Administered?

Community input highlight

Language status and program sustainability can change over time with access or limitations to federal funding. As such, data gathered from community representatives (survey respondents) should aim to reflect community-level needs. This will help align community priorities and federal funding. ▲

In this section, we provide an overview of the national survey, the current draft of which is included in Attachment 1. First, we describe how the survey topics align with the content required by the Durbin Feeling Native Languages Act of 2022 and our proposal to group content into modules to support participation. We also describe the collaborative development process used to design the survey. Second, we outline key administrative

characteristics, including our estimates for the time it will take respondents to complete the survey and the modes. Third, we provide recommendations for the survey format to support participation.

Successfully implementing the national survey requires flexibility.

What is needed: Using a collaborative, community-informed process, a draft survey has been developed to meet the learning needs of the Durbin Feeling Native Languages Act of 2022 and to elevate information that would be of use to participating entities. For the survey effort to be successful, the future survey team should prioritize flexibility in participation.

What it means for national implementation: Giving participating entities flexibility with which representative(s) completes the survey and how will promote participation. ▲

A. Description of survey content

1. Topic coverage

In alignment with the goals of the Durbin Feeling Native Languages Act of 2022, the survey will include questions to inform the following six key topics that Congress highlighted in the legislation:

1. Information on which Native American languages are currently used and spoken
2. Estimates on the number of users and speakers of each Native American language
3. Relevant statistics and information on language use
4. Information on the types of projects and practices meant to maintain and revitalize Native American languages
5. Information on unmet needs for preserving Native American languages
6. Any other necessary information

It is clear from the feedback received about this effort that the Tribal Nations and Native American language communities engaged for this survey will be quite diverse, and the survey attempts to reflect and respect that diversity. Each invited entity will have access to different kinds of data about its language and its use. Therefore, especially for questions addressing the estimates on the numbers of users, we will

design the survey questions to offer opportunities for respondents to provide different levels of specificity about these estimates, ranging from statements about community use to reporting numbers of users by age and fluency. Based on our understanding of the diversity of current Tribal or language community data, we also note that estimates of language speakers or users will most often be estimates and not exact numbers. Exact numbers might be feasible to report in some small Tribal Nations and Native American language communities that closely track usage but should not be the expectation.

One type of information **the survey does not seek to collect** is **anything that could be considered intellectual property**. This includes asking for any examples of language curricula, teaching materials, archives, or records of the language itself. In the introduction to the survey, we have proposed language to instruct respondents to avoid including any of this information in questions that allow written text responses, in which the respondent can write in potentially large blocks of text. The future survey team will have to establish safeguards in the analysis process to ensure we safely exclude unintentionally collected information from any dissemination products.

2. Modular survey organization

In addition, given the range of topics on the survey, the responding entity might have to identify multiple respondents to complete different sections of the survey. Therefore, we have proposed a modular approach to the survey. At the beginning of the survey, we recommend that the future survey team provide the main point of contact with a summary outline of the survey and allow the point of contact to recommend respondents for each module, as needed. Each module will start with a list of the types of information the section will ask and the purpose of collecting this information to enable respondents to prepare to complete the survey in advance. In addition, we recommend that the future survey team provide a static PDF document of all survey questions to support respondents in taking notes or preparing their responses.

3. Survey development process

To develop the survey, we conducted an initial review of a selection of existing surveys to identify items to consider for the survey. Based on recommendations from ANA, OPRE, and the CWG, along with online searches, we identified 37 sources for surveys with potentially relevant items to review. From these sources, we identified over 800 individual potentially relevant items, which we coded by topic and reviewed to include in initial draft lists. We suggested adaptations to align with the goals of this survey effort (for example, revising individual-level items to community-level) and developed 30 new items to address gaps in information or details relevant to the focus of the Durbin Feeling Native Languages Act of 2022. Our federal partners and the CWG reviewed this item list before posting for a 30-day public comment period. After the public comment period, we worked with the federal partners and CWG to refine items and the overall flow to create the final draft survey. The review of the item set and revised survey under this project included Native linguists and organizations via the CWG, as well as the public review, but there has been no pretesting or cognitive interviewing of the items. All items would benefit from pretesting, though this is especially true for items that are essential for logical routing through the survey (such as questions about the status of the Native American language or current language-learning initiatives).

Throughout the survey development process, there has been tension in feedback received about the preferred format of items; some feedback has recommended that the survey items give respondents the opportunity to tell the story of their Tribal Nation or Native American language community through questions that allow written text responses. Other feedback has emphasized respecting the respondent's time and trying to minimize the burden of the survey. To honor these recommendations, we have drafted response options for most applicable questions that respondents can select, but always allow for an optional text response if the options do not align with their experiences. Then, the survey will ask a select group of questions using an optional text response format.

Another tension that arose during the survey development process around respondent burden is that reviewers often provided suggestions for additional content for the survey draft but struggled to identify content to cut or drop from the survey. For instance, despite explicitly requesting suggestions for content to exclude during the public comment period, few suggestions were made. This emphasizes the wide range of interests and priorities for this learning effort. Because of this, we re-emphasize the importance of the field test for this survey and recommend that close attention be paid to what participants emphasize is both key content for inclusion, feasible for them to answer, and appropriate for them to report.

Tribal Nation and Native American language communities that provided input on this plan elevated that many of the current constructs being researched about Native American language revitalization, maintenance, and use are not framed from a Nation or community perspective. For example, the nonlinguistic outcomes of language learning—such as language as a protective factor and the immense and evolving cultural significance of language sharing in the home—are equally as important, and for some Nations and communities, even more important than a specific count of language speakers. A qualitative case study approach that takes a deeper look into topics elevated by Tribal Nations and Native American language communities and infuses community context, cultural congruency, and relevance into the understanding of those topics could complement a future national survey administration (discussed further in Appendix D).

Attachment 1 includes the final draft survey and Appendix A within this attachment includes a full list of the sources for the survey items.

B. Administrative characteristics

1. Time to complete the survey

It will be important for the length of the final survey to carefully balance the prioritization of key questions with a focus on streamlining the effort to minimize respondent burden as much as possible. In soliciting feedback from the CWG and the public during the survey design process, feedback coalesced around the suggestion that the survey should take no longer than one hour to complete, and the future survey team should provide a token of appreciation to acknowledge the time spent by respondents to participate (discussed further in subsection VII.B, within Section VII, *Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation*). As such, we recommend that the current draft survey is pretested to understand how long it will take a respondent to gather existing information (such as estimates of language users) and to complete the survey itself (as previously described in Section

V, *Recommendation for Additional Design Preparation to Finalize Content and Procedures for Successful National Implementation*). In particular, it will be important for the future survey team to use the survey instrument pretest effort to learn about what existing data Nations and communities have, as well as the need and capacity to gather additional data if needed, as this will influence how long it takes a participating entity to prepare to complete the survey.

2. How to complete the survey

To reach as many entities as possible, we recommend an **adaptive, multimode design** for this survey. In other words, a respondent can choose between multiple options for how to complete the survey, but the future survey team will roll out more cost-efficient options first. The modes we recommend include a web survey, a computer-assisted telephone interview (CATI), and an in-person (field) interview (Exhibit V.1). We could activate the rollout of more expensive modes by setting certain thresholds, including a certain amount of time passing since the invitation went out (for example, start CATI dial-outs two weeks after sending web invitations) or if we don't achieve a targeted response rate within a particular time frame.

Given the complexity of routing in the survey, we do not recommend offering a hard-copy paper version of the survey, except when the other three modes are not feasible. For instance, certain areas in Alaska are very remote, where both internet and phone connectivity can be poor and in-person travel might be challenging to coordinate. In the case where a Tribal Nation or Native American language community wishes to participate, but finds the three main modes too challenging, in this instance we recommend that the survey administration team mail the respondent a hard-copy version (with a pre-paid return envelope) and includes detailed instructions to support completion.

Exhibit VI.1. Potential survey modes and their benefits and considerations

Modes	Benefits	Considerations
Web survey	Allows for complicated skip logic that ensures the respondent receives only the most relevant items; relatively low cost to administer	The respondents' access to and comfort with the technology needed to complete will vary (computer and internet)
Phone interview	Allows for the same level of routing complexity as the web; offers more conversational approach; allows an opportunity to clarify questions about information and items	More expensive than web to administer
Field or in-person interview	Offers the most personal touch in administering the survey; allows opportunity to clarify questions about information and items; ability to assist with administration	Most expensive mode to administer
Hard-copy survey	Can be administered when access to internet or technology is limited; inexpensive to field	Given the current proposed routing for different types of respondents (for example, for entities with or without access to population numbers), a hard-copy survey could be very difficult to self-administer

C. Identifying and supporting survey participants

The future survey team will have to identify a main representative for each Tribal Nation and Native American language community to complete or oversee completion of the survey. Across invited entities, there will likely be variation in what office or group has access to data on language-learning efforts and

estimates of language speakers or users. The office or group could be within a community at a single office or across multiple offices. For some invited entities, an outside organization might maintain information on language status or language-learning efforts (such as the [Sealaska Heritage Institute](#), which serves many Alaskan entities and has information across and by village). In these cases, any request would still begin with the Tribal Nation or Native American language community to identify such an organization and provide review and approval of the survey request (as described in Section III, *Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*).

The future survey team will have to provide clear survey topic descriptions and instructions to help identify the type of representative(s) needed for each Tribal Nation or language community. Options for providing this information include advance materials with a separate line describing each module or topic in the survey on the type of information and level detail required. Future work to program a web survey or CATI could also include module launch points to enable the main entity representative to identify and designate a different representative to complete particular modules. We recommend that the survey include questions to ask for the contact information for each individual who supports completion. This will allow the future survey team to contact the responding individuals if questions arise about the submitted data.

D. Considerations for the format of the future survey

The complexity of the survey topics and diversity of the population mean the survey has to be adaptable to the different needs or characteristics of each participating Tribal Nation or Native American language community.

1. Flexibility for multiple respondents

First, in many instances, a single person within a Tribal Nation or language community might not know or have access to all the information asked in this survey. It will be beneficial to create a streamlined process for when multiple people will complete parts of the survey. We recommend that the design of the survey allows for the following:

- All participants should receive a concise description of the outline and organization of the survey in advance. This resource should highlight the types of information requested within each section of the survey to enable the main contact at each Tribal Nation or language community to plan and assign sections to different people as needed.
 - The survey will include items for the individual assigned to each section to provide their name and contact information so the future survey team has a complete understanding of the number of participants to inform future survey iterations and provide tokens of appreciation.
- On the web version of the survey, we recommend organizing the survey into distinct sections that are easily accessible from the launch page. For instance, each module might have a button on the launch page, enabling different people to complete different sections.
- For the phone or in-person interview, the future survey team will program the survey to allow the main contact to provide the name and contact information for the people who should complete

certain sections as needed for follow-up. The future survey team will train interviewers to navigate the instrument accordingly and conduct it in multiple sittings if needed.

2. Flexibility for multiple languages or dialects

The populations of some Tribal Nations or Native American language communities could use multiple languages or dialects. In these cases, it will be critical for the future survey team to determine the need for multiple main contacts to complete unique surveys for each language and/or dialect, or if a single representative knows or has access to data on multiple languages and/or dialects and can report on behalf of more than one language or dialect. The token of appreciation provided for respondents should be responsive to this kind of variation in respondent burden (discussed further in subsection VII.B, within Section VII, *Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation*).

3. Flexibility to learn and adapt over time

It is highly likely that the landscape of Native American languages will change over time, and this survey effort will have to adapt to meet shifting needs and priorities. Lessons learned from each iteration of the survey administration and data analysis will likely inform future refinements. It will be important that there be time built into the five-year administration cycle to revisit the design of the survey administration approach and the survey content.

Over time, there could also be opportunities to realize efficiencies in the data collection procedures. For instance, for entities that completed the prior iteration, the future survey team could program the survey to pre-populate certain estimates from the previously reported data and then ask respondents to confirm or update, without having to respond from scratch.

VII. Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation

Community input highlight

Plans for outreach and distribution should account for and acknowledge that the survey will be one request among many existing administrative burdens for both the Tribal Nation and Native American language community and survey respondents. Some Nations and communities might want to respond but could be unable to do so for different reasons (for example, time limitations or limited capacity to gather data needed to answer survey questions). ▲

In this section, we outline recommendations for staffing, outreach approaches for distributing the survey, data confidentiality protections, and monitoring to achieve high response rates. We then describe considerations for preparing the final data files.

All aspects of data collection should elevate trust- and relationship-building.

What is needed: Early and often engagement focused on building trust and relationships and upholding the Agreement to Participate Pillar, Local Research Review Pillar and Data Stewardship Committee Pillar will support data collection.

What it means for national implementation: Hiring and training survey administration staff and trusted outreach partners to oversee a transparent and flexible data collection effort will promote participation. The data collection phase will require 6 to 24 months, reflecting the variability in review and approvals before conducting data collection. ▲

A. Considerations for survey distribution

As described in Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), the Agreement and Local Research Review Pillars will be critical to the survey recruitment effort. These steps will need to occur prior to distributing the survey. Below we recommend key staff, outreach approaches, and data confidentiality assurances to promote trust-building and encourage participation.

1. Future survey team staffing

Based on feedback received from public comments, the CWG, and other consultations prior to and during the design phase for this work, we propose that the initial outreach, recruitment, and survey distribution efforts are supported by both conventional survey administration team roles and key partners with relationships with and in the Tribal Nations and Native American language communities the survey administration team, within the larger future survey team, will engage.

Survey administration team. Identifying and training culturally competent staff to administer the survey will be critical to the success of the effort. If a multimode survey administration approach is used, the following staff roles will be necessary to implement the survey (at a minimum):

- Survey director: to oversee the data collection effort and work closely with federal and other key project

partners (such as a community work group) to track progress and anticipate or adapt to challenges

- Survey liaisons: to conduct outreach and recruitment efforts, build relationships with Tribal Nations and Native American language communities, navigate approval permissions, support respondents during data collection, and communicate early analysis and disseminate plans
- Telephone interviewers: to facilitate the survey over the phone with respondents
- Field staff: to facilitate the survey in person with respondents

Regardless of role, all staff should receive training that supports the cultural competency and humility of staff filling each role.

- Ideally, these staff will bring relevant experience engaging with Tribal Nations and Native American language communities, if not lived experience.
- All staff should receive training in cross-cultural understanding and cultural humility to ensure a common background on understanding the implications of history and historical trauma in Tribal communities; conducting research in Tribal communities, creating knowledge, awareness, and sensitivity to Native cultural norms; and communication strategies (verbal and nonverbal) and common forms of etiquette. All staff should understand and be aware of how these concepts map directly to the three Pillars necessary for respectful engagement: Agreement, Local Research Review and a Data Stewardship Committee. ACF resources could reference several sources in this training:

- [Cross-Cultural Understanding and Cultural Humility: Training for Early Childhood Researchers Working with American Indian and Alaska Native Communities \(CCU\)](#)
- [A Roadmap for Collaborative and Effective Evaluation in Tribal Communities](#)
- [rETHICS: Research Ethics Training in Health in Indigenous Communities](#)

Trusted outreach partners. Especially in the first iteration of this survey, building relationships and trust with Tribal Nations and Native American language communities will be critical for success. Based on feedback, identifying trusted regional and local champions of the survey effort to assist with initial outreach and navigating local approval processes will greatly support initial trust-building activities.

- Trusted outreach partners should be champions for the survey who have relationships and connections with Tribal Nations and Native American language communities. These champions could be ANA staff, members of the current or future CWG, or other people working with Tribal Nations and Native American language communities on language reclamation and revitalization work.
 - Possible organizations to identify these partners include Native American linguists, regional language centers housed at colleges and universities or possible coordination with the U.S. Department of Education’s National Native American Language Resource Center, and the Historic Preservation Offices within the National Park Service.

2. Outreach approach for survey invitation

Outreach should focus on building relationships and trust. Based on feedback, identifying trusted champions for this survey to support initial outreach will greatly support initial trust-building activities.

- The survey administration team should work closely with federal partners, the CWG, and trusted outreach partners to craft informative, concise outreach materials.

- These could include a full media toolkit that would support trusted partners and—once engaged—Tribal Nations and Native American language communities in getting the word out through a variety of methods, such as suggested content for social media or talking points for radio or podcast features.
- The survey administration team should work with trusted outreach partners to identify opportunities to engage with Tribal Nations and Native American language communities in which the partner has existing connections and/or in a designated region.
 - Outreach partners could use a number of techniques to connect with Tribal Nations and Native American language communities, including personal emails and phone calls or social media posts.
 - They could also identify and attend community events (as appropriate) or local, regional, or national conferences to share information about the survey effort.
 - Outreach partners could then ask their personal connections to recommend others to speak with in their or other communities to widen the outreach effort.
- After making a connection, outreach partners could then coordinate with liaisons from the survey administration team to coordinate a hand-off to complete recruiting and permissions.
 - The survey administration team will work with their outreach partners to determine the best approaches to contact and could use an adaptive approach between an invitation letter, email, and/or phone call. If they do not receive a response after at least one follow-up attempt or after a designated length of time, the liaison could try another outreach approach.
 - To support relationship and trust-building, as well as participation rates, the survey administration team should offer direct supports as needed to assist respondents with completing the survey. This kind of support could occur virtually or in-person, especially at existing gatherings such as community events or conferences.

3. Data confidentiality protections

Protecting the confidentiality of communities and survey respondents will be critical to the success of this effort. In collaboration with the Data Stewardship Committee and ANA, the future survey team will design a security and confidentiality plan that aligns with federal requirements and uses and builds upon ACF security standards. The future survey team will also craft clear and transparent outreach and participation agreement materials that describes these protections in plain language to encourage communities to participate. The future survey team should include dedicated security and privacy experts to ensure the use of secure data management practices.

Key security and confidentiality considerations should include several elements:

- Train all project staff on data security and confidentiality procedures.
- Create clear procedures to safely handle personally identifiable information (PII), including incident reporting procedures.
- Review data collection methods and data storage to ensure security.

In addition, the future survey team should use the following assurances to encourage participation:

- No data that identifies the name of the survey respondent(s) or the community will be shared outside the reporting community.
- The respondent and the entity leader will receive a summary of the data reported by an entity, while redacting the respondent's information.
- No survey items will ask for content that could be considered personal or community-level intellectual property.

B. Monitoring and approaches to achieve high completion rates

Achieving a high response rate will provide the most accurate snapshot for Congress of the current use of Native American languages. The survey administration team should closely monitor the data collection effort and adapt protocols to reduce missingness as appropriate. Several considerations can help achieve this:

- Have trusted outreach partners engage early and often with communities. In particular, encourage attendance at existing events or support in-person visits.
 - Potential events include the Symposium on American Indian Languages and national or regional conferences such as the National Congress of American Indians' Language Task Force gathering.
- Design an adaptive approach to tailor follow-up response efforts. We recommend the future survey team reach out to participating entities through a variety of methods and offer the survey in multiple modes to address accessibility, as well as following recommendations provided in the [OPRE 2023 methods meeting](#) to reduce missingness and minimize nonresponse.
- **Provide tokens of appreciation.** To show appreciation for respondents' time and participation the future survey team may want to consider offering an honorarium to participating respondents. Decades of research indicate monetary incentives increase response rates without compromising data quality (for example, Singer & Ye 2013). Particularly for populations like Tribal Nations and Native American language communities that have experienced harm in past data collection efforts, providing fair compensation to people for their time reduces inequities. Additionally, in light of the history of the federal government's oversight in the dismantling or eradication of Native American languages, providing a financial token of appreciation to participating entities or individuals is an important foundational step in building trust. This is especially true given that the survey will be administered on an ongoing 5-year cycle. We recommend an honorarium is provided to participating respondents that is based on the length of the final survey. If multiple respondents support survey completion, the survey administration team could distribute the payment based on the amount completed.
 - Some participating entities might not be able to receive individual compensation, however. In those cases, we recommend that the survey administration team engage with entities during the recruitment process to determine if an entity-level honoraria would be appropriate. For a similar survey effort conducted by the First Peoples' Cultural Council to understand community-level language use in British Columbia, participating entities received a \$500 honorarium.
 - Pretesting and field testing the survey will support the survey administration team's understanding of key factors that may influence the final amount for the honoraria. This will include a better understanding of the burden for completing the survey, what type of roles respondents hold in their Nation or community, and how many unique respondents are involved in preparing for and completing a survey.

The survey administration team should also plan to conduct frequent data quality reviews during the data collection field period to monitor completeness and logic checks. This could include checks to monitor if respondents frequently skip certain questions or if answers to a series of questions do not follow a logical pattern. During discussions with the project's CWG, members encouraged requiring few if any questions in the first iteration of the survey to build trust (in other words, allowing respondents to skip any questions they do not wish to answer). This will mean data quality checks are especially important for the survey administration team to monitor if respondents are not required to answer key questions before submitting the survey. These checks can also vary depending on the mode. For instance, although the survey administration team will have to monitor web data after submission, they could monitor phone interviews in real time (with the permission of the respondent).

C. Preparing data for analysis and reporting

The future survey team will have to plan for processing the raw data across modes for final delivery of clean, de-identified files to support analysis and reporting. Activities should include outlining consistent and clear processes to achieve specific goals:

- Review and clean the raw data files.
- Edit and possibly conduct imputation for missing information.
- Review and back-code or synthesize written text responses.
- Flag any written text that could be considered intellectual property and coordinate with the survey respondents to determine whether to remove the text from analysis and synthesis.
- Strip the file of any PII or identifying information at the entity level.
- Possibly develop composite variables or mask variables.

The future survey team will deliver final files to ANA for use as determined with guidance from the Data Stewardship Committee (as described in Section IV, *How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*). It will also be valuable for responding entities to receive copies of the data they reported. The future survey team should plan to design and create entity-level summaries that share the information provided with the entity leader and respondent(s), after removing any PII reported by the respondent. Data summaries could be provided both at the time of survey submission and after the data has been cleaned and analyzed, especially if follow-up efforts with the responding entity result in edits to the original data. Feedback received during the survey design process indicated the data provided in those summaries should be considered current until the next cycle of the survey for the purposes of responding to federal grant applications for supporting language efforts. Section VIII (*What Are the Considerations and Methods Ways for Communicating and Sharing Findings?*) presents additional points for working with the data to include analysis, interpretation, and reporting.

VIII. What Are the Considerations and Ways for Communicating and Sharing Findings?

Community input highlight

Data should be useful to and have practical value for the Nations and communities from which the data were gathered. Findings should be available to the public and lead to policy change around funding for language preservation and revitalization efforts. Tribal Nations and Native American language communities that provided input reported significant concerns about the needs of Nations and communities that remain unmet by current funding opportunities (for example, the limited funding available and the highly competitive and prescriptive nature of attempting to receive it). ▲

The Durbin Feeling Native Languages Act of 2022 underscores the need for data to benefit communities. From the proposed learning-oriented approach, the survey data can and should help build a narrative of growth, which will vary based on where a Tribal Nation or Native American language community is in its language learning journey. The survey can provide information on status, efforts, challenges, and successes in language revitalization and maintenance efforts across entities. The anticipated use of these data includes informing the federal government on supportive measures for revitalizing language. Entities can also use their data or findings to support their activities (to include grant

applications to fund language-learning) and to learn about other entities' efforts. The process for this work should follow the Data Stewardship Committee Pillar outlined in Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*)—establishing a data stewardship committee to advise on and guide all aspects of data use. In this section, we highlight considerations for reporting related to grounding with a strengths-based framework, data analysis and interpreting results, and ways to share findings. For the first round of implementation, survey data provided by participants during the field test and full implementation efforts will be combined for analysis and reporting as a single round of data.

Respectful and ongoing engagement supports a learning-oriented project approach.

What is needed: Continuation of the Community Work Group and establishment of a Data Stewardship Committee to provide 1) insight on framing survey findings and 2) individual Tribal Nation and Native American language community review of results.

What it means for national implementation: Participatory processes to improve knowledge-building and actionable findings require time for analysis and reporting. Analysis preparation and engagement may require 6 to 12 months; review of findings and products may require 10 to 15 months

Phases: Analyze data; Review of findings and products

Key Activities:

- Develop data analysis and dissemination plans during design phase and refine through preliminary data review
- Engage Community Work Group and Data Stewardship Committee to co-create interpretation
- Prepare products with required federal reviews balanced with work group and committee input
- Share products for entity review prior to finalizing

Timeline Factors:

- Each step in preparing, reviewing, engaging, and refining could range from one to three months (depending on type and level of analysis, preparation of weights, and availability of reviewers)
- Entity review should allow sufficient time for local processes (such as Tribal Council or government approval of written comments), with a minimum of three months

A. Strengths-based framework with respectful and ongoing engagement

Using a strengths-based framework for respectful and ongoing engagement with Tribal Nations and Native American language communities is essential for fostering trust, collaboration, and mutual respect. Any survey efforts must honor the unique cultural heritage and knowledge systems of each Nation and community and affirm that data collection will generate insights that are culturally relevant, contextually appropriate, beneficial to the Nation or community, and valid to the federal government. ACF should continue to lean into the values described in A Roadmap for Collaborative and Effective Evaluation in Tribal Communities to center Native voices and support a new narrative of how research should be conducted in true partnership and advance equity and justice.

B. Analysis considerations for reporting

As discussed in Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), a Data Stewardship Committee should guide decisions about using the data to ensure the analysis and reporting respects and upholds the principles of sovereignty and self-determination. In collaboration with the committee, ANA and the future survey team will develop an analysis plan that should consider the types of analysis, the level of reporting, and how to address nonresponse. The underlying question throughout is how to best reflect where an entity is at and how to show change over time relative to that place. As part of conducting the analysis and upholding the Data Stewardship Committee Pillar, there will be a need for meaning-making opportunities for confirmation on accuracy on a shared interpretation of the data.

1. Types of analysis to consider

Future analytic methods must align to the survey design and the type of data available. Throughout the decision-making process, the goal will be to ensure the accurate representation of individual communities.

- Generally, the survey items are multiple choice. As such, the survey can provide descriptive estimates such as percentages, averages, or counts across participating Tribal Nations and Native American language communities. For example, summarized results might say “Of the Tribal Nations and Native American language communities that responded, [##] percent reported having a language archive.”
- Estimates of language speakers or users will vary based on the entity’s available data. The survey items proposed allow different levels of specificity in reporting estimates—exact numeric values, categorical ranges, or a qualitative statement on status. The future survey team will have to report these quantitative and qualitative assessments separately. The future survey team could consider ways to combine them for reporting across all communities, such as translating numeric estimates into the relevant categorical range or with information on population counts to determine which qualitative statement align with a quantitative response. Additionally, context framing on sources and definitions will need to be reviewed for speaker estimates versus user estimates. The range in responses could be much wider for user estimates which can start with community building of language with greetings with more and various people prior to using language to have a conversation. The proposed survey testing for pretesting and field testing will help inform analysis decisions needed based on variability.
- Some questions ask for written text responses. After the data preparation (described in Section VI, *What Topics Does the Survey Cover and How Will the Survey Be Administered?*), analyses of these types of questions could include content analysis to identify themes and illustrative quotes and descriptive analysis for percentages or counts of those themes.
- Generally, each Tribal Nation and Native American language community will represent one observation in the analysis. However, some analysis might require weighting the entity response by the number of language speakers or users. The future survey team should consider the appropriateness of either approach for a given analysis.

Additional considerations for an analytic approach include the potential overlap of entities reporting on the same language (described in Section III, *Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*) and future analysis across multiple rounds of the national survey.

- The future survey team will have to review the data for any potential duplication of counts or efforts when multiple entities (such as a Tribal Nation and a UIO) report on the same language. Part of the process in the listing of entities will un-duplicate the list, but some overlap could exist when different entities capture different parts of the population for a language community (such as those that live on and off traditional lands). Survey items will collect information on the language being reported on, the location of the population, and population size. The future survey team will make analytic decisions based on review of such data. The future survey team should document adjustments or note limitations of potential under- or overestimates.
- Because the team will administer the survey every five years, future analysis could include examining multiple rounds of data to estimate change over time. The future survey team will have to proceed with caution when comparing estimates on the number of speakers or users. Precision for a time point could vary by availability of information and by respondent (depending on the respondent’s role or proximity

to the information). The representative might change across the five-year cycle that could also introduce variability in the information presented. Therefore, the future survey team should carefully compare estimates on speakers or users for the magnitude of the difference and the direction. They should confirm any large changes with the community. In reporting, caveats should emphasize potential limitations and how the future survey team examined change. This change will be relative to where an entity was at a previous time. The analysis of change needs to consider potential groupings such as by language learning status as discussed next.

2. Level of reporting across entities and by entity characteristics

The future survey team will conduct all data analyses across responding entities that will require decision on which participants to include. They can present the level of reporting for all Tribal Nations and Native American language communities (an aggregate or summary) and for key groups (or a subset of Tribal Nations and Native American language communities). Based on current federal supports and input gathered to date, we propose below several factors to define potential groups of Tribal Nations and Native American language communities:

- Language learning status, which honors where a Tribal Nation or Native American language community is at and learning about the unique efforts and needs of communities with speakers and communities with users, separately; across time, this level of group analysis will recognize the change in language-learning.
- Availability of data sources on estimates of speakers or users, to learn and identify potential supports to build capacity when desired to document counts and for appropriate analysis of change over time as a community's data sources and estimate change (for example, how to look across qualitative, categorical, and/or numeric responses).
- Geographic location or regional groupings, at minimum the ANA Training and TA regions (Eastern, Western, Alaska, and Pacific) to align with the legislation's goal of improving federal interagency support; a more nuanced categorization could include Alaska, Hawaii and the Pacific Islands, and then approximately 10 or 11 regions for the 48 contiguous states similar to the Bureau of Indian Affairs or National Congress of American Indians regions¹⁵.
- Entity type across languages, given potential overlap in the population. As outlined in Section III (*Identifying Tribal Nations and Native American Language Communities to Engage for a National Survey*), the individuals may live on or away from traditional lands. For a given language, looking across different entities (such as a Tribal Nation and an Urban Indian Organization) may provide information on where and how language learning is happening.
- Language dialect or family, to support learning about unique or common experiences. Some communities might have multiple dialects that separate estimates and results can best support local use of the data. Language families combine different languages together by using shared terms or historical relationships. Parallel national surveys in other countries, such as First Nations in Canada (Gessner et al. 2022), have reported at this level; however, CWG input has been mixed in presenting information by language families for the United States given inaccuracies in the [Ethnologue](#).

¹⁵ For Bureau of Indian Affairs regions, see <https://www.bia.gov/sites/default/files/dup/inline-files/idc1-028635.pdf>. For the National Congress of American Indians regions, see <https://www.ncai.org/regions>.

3. How to address nonresponse

Tribal Nations and Native American language communities do not have to participate in the national survey. We anticipate not every invited entity will participate for a variety of reasons, such as not having the assurances needed on federal collection of information, not having the capacity or staff available to complete the survey given other needs, or availability of the data. Although the goal is to provide a comprehensive, national picture on the status of Native American languages in Tribal Nations and Native American language communities, we recommend not developing weights to account for nonresponse patterns. Calculating these weights require defining a set of characteristics that might account for not responding and assumes similar factors at the Tribal Nation or Native American language community level. This process has one responding entity represent a nonresponding one of similar characteristics. Given the diversity of Tribal Nations and Native American language communities, the assumption that one person can represent another's language-learning story is not respectful of the vast heterogeneity across Tribal Nations and Native American language communities and will not produce more accurate results.

We recommend framing the reporting of findings around those entities that have results. The future survey team's report could include limitations of the findings based on the types of entities the future survey team was unable to reach. For example, if the survey does not capture information on larger Tribal Nations, then the future survey team will have to acknowledge that the report could underestimate the number of language speakers.

We recommend that the future survey team employ a variety of strategies to avoid nonresponse described previously in this report, such as providing ample time and assurances for Tribal Nations and Native American language communities to participate (see subsection IV.B within Section IV, *How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), providing resources and supports for survey participants to ease the burden of participation (see subsection VI.C within Section VI, *What Topics Does the Survey Cover and How Will the Survey Be Administered?*), and offering tokens of appreciation to express gratitude for participation (see subsection VII.B within Section VII, *Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation*). Among those who participate but may choose to not respond to every item within the survey, this plan offers initial steps as part of data preparations (see subsection VII.C within Section VII).

C. Potential ways to share survey results (data and findings)

As discussed in Section IV (*How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), using the data and sharing the findings must follow a process that honors data sovereignty and is guided by the Pillars of Agreement, Local Research Review and Data Stewardship Committee. In tandem with interpretation of the analysis, how to share the survey results will require meaning-making of the context, considerations or limitations, and implications of the findings. The potential products to share those results will be reviewed by participating entities prior to dissemination. Here we highlight approaches for future consideration to consider in that process for (1) the **data** (survey responses to the questions) and (2) **findings** (results of analysis of those data). The different ways to share and communicate survey results proposed here reflect

both requirements of the Durbin Feeling Native Languages Act of 2022 and input from engagement with the CWG and ANA consultations and listening sessions.

1. Potential ways to share data

- *Specific community.* Following the principles of data sovereignty, the future survey team will share a data summary with survey responses for an individual Tribal Nation or community (redacting the respondent's information to protect confidentiality of that individual). This document can potentially be provided shortly after survey completion with just the entity-specific responses. Another option could be a data summary that lists the entity-specific responses alongside the results aggregated across all participants as context.

The need for their specific data at minimum benefits the community for future use. CWG members expressed interest in maximizing the use of these data in grant applications. The survey data could provide information relevant to a community needs assessment about language learning. As such, federal offices should consider the data collected current for the duration of the five-year cycle until the next iteration of the survey. In addition, review across federal grant applications and the survey could identify places to revise either to improve alignment and reduce burden on communities to use one set of data for multiple purposes.

- *Group of communities.* The future survey team can create a codebook that provides the frequencies and descriptive data across all responding entities for each survey question, with no identifying information. A report of findings might not include information on every survey question. Tribal Nations and Native American language communities can use the codebook as a resource for grant applications and as context more broadly to have information on every survey question. This product can support communities to generate new questions they have about language-learning and drive their own research, programming, and policy planning.

2. Potential ways to share findings

- *Specific community.* A community-specific profile, if so desired by the Tribal Nation or Native American language community, can summarize the data in a more narrative form (see, for example, Gessner et al. [2022]). In addition, CWG members have noted the potential interest among communities that are similar across different dimensions (for example, community size, language status, and the types of revitalization efforts they are taking or planning) to build knowledge together. A future CWG or the Data Stewardship Committee should further discuss whether to enable communities to opt in to sharing their community identity linked to specific findings.
- *Group of communities.* Findings reported across communities could take many forms for different audiences.
 - As required by the Durbin Feeling Native Languages Act of 2022, there will be an aggregate Report to Congress (with findings across all communities and separate group findings as described in subsection VII.A, within Section VII, *Best Practices for Data Collection: Survey Distribution, Participation Monitoring, and Data Preparation*). Following the data sovereignty process (outlined in Section IV, *How to Uphold Sovereignty, Self-Determination, and Rights of Tribal Nations and Native American Language Communities for a National Survey*), the federal office will provide an opportunity for each

participating community to review. This review process could vary by community, and ANA should allot 6 to 12 months.

- In addition to a codebook (noted earlier), which will be a static document of single items, another product (depending on resources) could be an interactive dashboard, on which people can have options to look at questions of interest. The future survey team could prepare a plan for the dashboard's functionality to provide estimates for particular groupings (such as by geographic region) and potentially data visualizations to make the results more accessible.
- The future survey team, in consultation with the CWG and committee, should develop a dissemination plan for additional products to help support meaningful federal use of the data. Benefits for the community noted by CWG members included how the federal government will use the data to inform policy and programming and to coordinate specific interagency federal efforts. To support such work, the future survey team could develop overview and topical products, such as one- or two-page fact sheets geared to ANA training and TA staff for areas entities communicate a need for resources. The future survey team could also develop a slide deck for interagency use or ANA program staff to develop funding plans.

Any product based on the survey data should include the month and year of the start and end of data collection. The data collection window could be a long span of time. Providing this information can support interpretation of the results if policy or program changes occurred during that time.

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IX. Closing Reflections

Acknowledging and honoring the great diversity, complexity, distinctiveness, and cultural significance of each Native language and dialect, the *Design Options, Priorities, and Considerations for a National Native Languages Survey* plan provides information on the work completed to date and work that remains to be done to understand the status of all the Native American languages spoken in the United States through one national survey. We have described the three objectives of this survey design project.

- In the first objective of community engagement, the collective team designed an intentional outreach and engagement process that cultivated relationships with Elders and other experts in Native linguistics, language acquisition, and language reclamation to form a CWG that has provided extensive oversight and guidance throughout this project. A separate input summary memo was also developed to internally document the feedback received and the ways in which it was considered and applied to the approach to community engagement and all other aspects of the survey and design plan. A summary of input is available by contacting ANA at anacomments@acf.hhs.gov.
- Through the second objective of survey development, an initial survey was drafted, and through continuous engagement with the CWG, revisions were implemented based on their wisdom and guidance. Public comments and community input were also incorporated into the survey and design plan development process and prioritized in the outreach and implementation strategies recommended in this plan. A companion attachment presents the draft survey and source list.
- This design plan serves as the culmination of the third objective to produce a document that outlines survey design and administration and timeline considerations for a future national implementation.

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Appendix A

List of Opportunities for Community Input

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Appendix A.1. List of comment opportunities conducted by ANA, Mathematica, and MEES before and during project contract period

Type of comment opportunity	Comment opportunity	Date
ACF Tribal consultations	ACF Tribal consultation input on the implementation of the Durbin Feeling Native American Languages Act	June 5, 2023
	Tribal Advisory Committee (TAC) presentation and discussion	October 25, 2023
Listening sessions hosted by the Administration for Native Americans (ANA) with representatives from Alaska and the Pacific, as well as Tribal Colleges and Universities	Native Hawaiian community listening session	June 20, 2023
	Alaska Native community listening session	August 8, 2023
	American Indian Higher Education Consortium (AIHEC) listening session	October 3, 2023
Community Work Group meetings	Full CWG kickoff meeting	December 12, 2023
	Survey subgroup meeting	January 10, 2024
	CWG Design and distribution subgroup meeting	February 7, 2024
	Second full CWG meeting to make meaning of public comments	April 3, 2024
	Second survey subgroup meeting	April 26, 2024
Other opportunities	Senate Committee on Indian Affairs Oversight hearing "Examining the COVID-19 Response in Native Communities: Native Languages One Year Later"	May 26, 2021
	Departments of the Interior, Education, Agriculture, and Health and Human Services Durbin Feeling Native Languages joint listening session	October 18, 2023
	NIEA meeting to discuss data sovereignty and intellectual property	February 28, 2024
	Feedback from the Notice of Public Comment period	March 8 to April 8, 2024

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Appendix B

List of recognized Tribal Nations and Inter-Tribal Councils

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Appendix B.1. List of federally and state-recognized Tribal Nations, by state

State	Number of federally recognized Tribal Nations	Number of state-recognized Tribal Nations
Alabama	1	9
Alaska	229	0
Arizona	21	0
Arkansas	0	0
California	110	0
Colorado	2	0
Connecticut	2	3
Delaware	0	2
Florida	2	0
Georgia	0	3
Hawaii	0	0
Idaho	4	0
Illinois	0	0
Indiana	1	0
Iowa	1	0
Kansas	4	0
Kentucky	0	0
Louisiana	4	11
Maine	4	0
Maryland	0	2
Massachusetts	2	1
Michigan	12	0
Minnesota	8	0
Mississippi	1	0
Missouri	0	0
Montana	8	0
Nebraska	6	0
Nevada	19	0
New Hampshire	0	0
New Jersey	0	3
New Mexico	23	0
New York	8	3
North Carolina	1	7
North Dakota	4	0
Ohio	0	0
Oklahoma	38	0
Oregon	10	0
Pennsylvania	0	0

State	Number of federally recognized Tribal Nations	Number of state-recognized Tribal Nations
Rhode Island	1	0
South Carolina	1	7
South Dakota	9	0
Tennessee	0	0
Texas	3	0
Utah	7	0
Vermont	0	4
Virginia	7	11
Washington	29	0
West Virginia	0	0
Wisconsin	11	0
Wyoming	2	0

Source: National Conference of State Legislatures 2020. Accessed April 4, 2024.

Note: Federal recognition is limited to Tribal Nations and does not include Native Hawaiian and Pacific Islander communities.

Appendix B.2. List of Inter-Tribal Councils and the states in which they operate

Inter-Tribal Council	State(s)
Affiliated Tribes of the Northwest Indians	Alabama, California, Idaho, Montana, Oregon, Washington
Alliance of Colonial Era Tribes	Alabama, Delaware, Louisiana, Maine, North Carolina, New Jersey, Texas, Virginia
Alaska Federation of Natives	Alaska
Alaska Inter-Tribal Council	Alaska
All Pueblo Council of Governors	New Mexico
California Tribal Chairpersons Association	California
California Tribal Business Alliance	California
Council of Confederated Chilocco Tribes	Oklahoma
Eight Tribes Intertribal Council	Utah
Great Lakes Intertribal Council	Wisconsin
Great Plains Tribal Chairman's Association	Nebraska, North Dakota, South Dakota
Intertribal Council of Arizona	Arizona
Intertribal Council of California	California
Intertribal Council of Michigan, Inc.	Michigan
Intertribal Council of Nevada	Nevada
Intertribal Council of Northeast Oklahoma	Oklahoma
Intertribal Council of the Five Civilized Tribes	Oklahoma
Midwest Alliance of Sovereign Tribes	Indiana, Iowa, Michigan, Minnesota, Wisconsin
Montana-Wyoming Tribal Leader's Council	Idaho, Montana, Wyoming
Southern California Tribal Chairmen's Association	California
Tribal Alliance of Sovereign Indian Nations	California
United South and Eastern Tribes	Alabama, Connecticut, Delaware, Florida, Louisiana, Maine, Maryland, Massachusetts, Mississippi, New York, North Carolina, Rhode Island, South Carolina, Tennessee, Texas, Virginia
United Tribes of Michigan	Michigan
United Tribes of North Dakota	North Dakota

Source: National Congress of American Indians 2020. Accessed April 4, 2024.

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Appendix C

AI/AN FACES 2019 Agreement of Collaboration and Participation

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American Indian and Alaska Native Head Start Family and Child Experiences Survey (AI/AN FACES) 2019

Agreement of Collaboration and Participation

The success of this important study of children and families served by Region XI Head Start programs depends on a close collaboration between each of the 22 unique Region XI programs and the study's data collection contractor, Mathematica Policy Research. The roles and responsibilities of each of the parties must be clearly stated and understood. The Agreement of Collaboration and Participation is designed to achieve this goal by specifying what Mathematica and each participating Region XI program agrees to as part of this collaborative effort.

Mathematica agrees to:	Region XI Head Start Program agrees to:
• Respect program participants, including but not limited to Head Start program staff, community leaders and members, children, and their families. – Mathematica AI/AN FACES staff will receive training on the unique features of tribal programs, communities, and culture. – Mathematica will involve appropriate tribal program and community members at each phase of the study. – The goal is to create a partnership that benefits both parties and, most importantly, the children and families of Region XI.	• Work with AI/AN FACES study staff to achieve the goals of the study. – Provide assistance as needed to plan for and complete all data collection activities. – Provide guidance to AI/AN FACES study staff in how to work effectively and respectfully with members of the tribal community, including its leaders, program staff, children, and families.
• Protect the privacy of all study participants, Region XI programs, and tribal communities. – All study staff will sign confidentiality agreements. – Study staff trainings will include the importance of protecting the privacy of every participant, program, and tribal community and the consequences of breaching the agreement, including dismissal from the study. – Follow a need-to-know policy when sharing information about study participants with staff at Mathematica and program staff. – Data on laptop computers will be secured through hard drive encryption as well as operation and survey system configuration and a password. Any computer files that contain this information also will be locked and password-protected. The future survey team will remove from all completed questionnaires personal identifiers that could be used to link individuals with their responses. All hard copy questionnaires will be stored under lock and key. – Mathematica will only report on data at the national Region XI level. No findings will be reported for individual programs or tribal groups.	• Protect the privacy of all study participants, the program, and the tribal community. – Protect the identities of the children and families participating in the study. – Follow a need-to-know policy when sharing information about study participants with other program staff. Will not share information about study participants with anyone outside of the program, with the exception of AI/AN FACES study staff. – Recognize that individual, program, and community-level data or findings will not be shared.

Mathematica agrees to:	Region XI Head Start Program agrees to:
• Work with Region XI Head Start program staff to obtain tribal approval for the program's participation in the study. – Work with the program to identify the required steps for tribal review and approval. – Mathematica study directors and members of the AI/AN FACES Workgroup will present the study in person or by phone at the request of tribal authorities and will provide an informational fact sheet for sharing with the community.	• Work with AI/AN FACES study staff to obtain tribal approval for the program's participation in the study. – Identify the tribal review and approval process and assist in presenting the study to tribal officials responsible for review and approval of the program's participation. – Share information about the study and its goals with members of the tribal community.
• Work in tandem with the on-site coordinator (OSC), designated by the program director, in order to meet project goals. – Mathematica will assign an AI/AN FACES liaison, a member of its professional staff, to work with each of the 22 Region XI programs participating in the study. – AI/AN FACES liaison will be the program's primary contact with Mathematica. – AI/AN FACES liaison will work with the OSC to schedule visits by AI/AN FACES study staff to the program to select the classrooms and children who will be asked to participate in the study and data collection visits. – AI/AN FACES liaison will work with the OSC to develop a logistical plan for data collection that meets the unique needs of the tribal program and achieves the study goals. AI/AN FACES liaison will share this data collection plan with the program director when finalized.	• Designate an on-site coordinator (OSC), who will work with the AI/AN FACES liaison in order to meet study goals. – The OSC will be Mathematica's primary contact with the program. – The OSC will assist AI/AN FACES study staff in scheduling AI/AN FACES study visits. – The OSC will work with the AI/AN FACES liaison to develop a data collection plan for the program.
• For programs with more than one center, select two centers randomly to participate. Many Region XI programs have only one center, and that center will be asked to participate.	• Provide a list of centers within the program, if applicable. The designated OSC will provide this information to the AI/AN FACES liaison.
• Conduct a visit in fall 2019 prior to the start of data collection to prepare for upcoming data collection activities. – This visit will typically last two to three days in each center. – Trained AI/AN FACES study staff will work with the OSC to randomly select the classroom and child samples, distribute and collect parent consents, and speak with parents about the study.	• Work with the AI/AN FACES liaison to arrange the visit by trained AI/AN FACES study staff.
• Randomly select classrooms for the study; typically, two classrooms will be selected in each center. The actual number of classrooms will vary depending on the size of the program and whether the program has one or more centers.	• Provide visiting AI/AN FACES study staff a list of all Head Start classrooms in the center for random selection into the study.

Mathematica agrees to:	Region XI Head Start Program agrees to:
• Within selected classrooms, randomly select Head Start children for participation, ensuring that all children have an equal chance of being selected to participate. – Distribute consent forms to the parents/guardians of the children selected to participate in the study. – Meet with children's parents/guardians to explain the study, what participation involves, and answer their questions.	• Provide a list of Head Start children for random selection into the AI/AN FACES study. – Random selection into the study does not require participation: Signed parent/guardian written consent is required for each child to participate in the study. – Working with AI/AN FACES study staff, arrange for the distribution and collection of parent/guardian consent forms for children selected to participate in the study.
• Communicate that participation is completely voluntary and inform participants of their rights as a participant. – Consent must be given by parents for children to participate, which will occur in fall 2019. – Participants may withdraw from the study at any time. – Program eligibility, services, and benefits are not in any way affected by study participation.	• Answer parents' questions about the study and what participation involves for both children and parents.
• Conduct data collection in a manner that is respectful of tribal customs and practices and is least disruptive to Head Start programs' daily routines. – Schedule data collection visits being cognizant of not disrupting any tribal community celebrations or events. – Be flexible in working with programs and their day-to-day activities. – Recognize that AI/AN FACES study staff are guests in the programs.	• Work with AI/AN FACES study staff to ensure that all data collection is respectful of program staff, children, and families and limits disruptions to day-to-day program activities and routines. Program staff, children, and families will be given enough advance notice of data collection activities to ensure all questions and concerns are addressed. – Provide information to study staff regarding appropriate verbal and nonverbal communications styles.
• Conduct the following data collection activities in fall 2019: – Trained and experienced Mathematica study staff will work with AI/AN FACES children (children who were selected for the study and whose parents have consented for them to participate), administering individual, age-appropriate assessments of children's school readiness skills. – Invite the parents of AI/AN FACES children to participate in a survey by web or phone. – Invite classroom teachers to complete reports on AI/AN FACES children by web or on paper.	• Work with AI/AN FACES study staff to arrange logistics for data collection activities, including: – Working with the AI/AN FACES study staff on the arrangement of on-site child assessments (such as reminding parents and teachers of the visit, designating a location for the assessments to take place, providing classroom schedules, etc.). – Monitoring the completion of surveys by parents and program.
• Confirm enrollment status for AI/AN FACES children prior to spring 2020 data collection to account for children changing classrooms and children leaving the program. – Children who change classrooms in the same center will be eligible for the spring data collection. – Children who leave the program will no longer be a part of the study sample.	• Provide an update on child enrollment of selected children between fall 2019 and spring 2020. – Provide an update on AI/AN FACES children's classroom assignment and teacher. – Identify children who have left the program and the reasons for leaving, if known.

Mathematica agrees to:	Region XI Head Start Program agrees to:
• Conduct the following data collection activities in spring 2020: – Trained and experienced Mathematica study staff will work with selected children (whose parents consented in fall 2019 to let them participate), administering individual, age-appropriate assessments of their school readiness skills. – Staff will also conduct classroom observations in classrooms with AI/AN FACES children. Each classroom will be observed for roughly three hours. – Invite the parents of selected children to participate in a survey by web or phone. – Invite classroom teachers to complete a teacher survey and reports on AI/AN FACES children by web or paper. – Invite program and center directors to complete surveys by web or on paper.	• Work with AI/AN FACES study staff to arrange logistics for data collection activities, including: – Working with the AI/AN FACES study staff on the arrangement of on-site child assessments and classroom observations. – Monitoring the completion of surveys by parents and program staff. – Assisting AI/AN FACES study staff monitoring survey participation and obtaining completed surveys for the program director, center director, classroom teachers, and parents.
• Provide gifts or gift cards for AI/AN FACES teacher, child, and parent participating in fall 2019 and spring 2020. – Each selected child completing the assessment will receive a culturally appropriate children's book (worth \$10) and stickers throughout their individual assessment. – Teachers will be provided with stickers for all children in the selected classrooms. – Teachers will be asked to complete a 10-minute report for selected and participating children outside of school hours. They will receive a \$10 gift card for each form they complete. – Parents will receive a \$30 gift card for completing the parent survey. – In the spring, each classroom that is observed will receive a culturally appropriate gift for completing the classroom observation. – Work with program staff and members of the AI/AN FACES Workgroup to identify culturally and age-appropriate books for children and classrooms.	• Program will inform AI/AN FACES study staff of any restrictions on teachers receiving gift cards. • Program staff will assist Mathematica in identifying books that are appropriate for classrooms in their program.

Mathematica agrees to:	Region XI Head Start Program agrees to:
• Share the findings from the AI/AN FACES study with the 22 participating programs. – All initial analyses of the data will be conducted by professional research staff at Mathematica who will work with members of the AI/AN FACES Workgroup to design analyses that answer the questions of greatest importance to Region XI and AI/AN communities. – Reports will be written by Mathematica staff with input from members of the AI/AN FACES Workgroup. – All findings will be reported for Region XI as a whole. No findings will be reported at the individual program or tribal community level. – Findings will focus primarily on descriptions of children and families in Region XI programs and their experiences in those programs. – Copies of all reports, briefs, and presentations of findings will be shared with participating programs.	• Assist in disseminating copies of reports, briefs, and presentations of findings to program staff, families, and communities. Programs will ensure that the findings are shared with the participants in the most appropriate manner; e.g., hard copy handouts, email, events offered to share in a group setting. – Reports generated by Mathematica with input from Administration for Children and Families and AI/AN FACES Workgroup will not be reviewed or approved by all 22 participating communities. Communities agree that these reports can be shared without their review and approval. – Reports will be posted on the ACF and OPRE websites to facilitate access by programs, tribal communities, and others. – Identify the desire for and assist with scheduling presentations from Mathematica staff and/or AI/AN FACES Workgroup members.
• Work with the Administration for Children and Families, Office of Planning, Research, and Evaluation, and members of the AI/AN FACES Workgroup to ensure that future analyses of the AI/AN FACES data are done accurately and recognize the uniqueness of tribal communities and peoples. – Conduct data training seminars on how to accurately and ethically analyze and report on Region XI children and families. – Create a restricted-use data set that will be available to qualified researchers. – All personally identifiable information will be stripped from this data set, including names and tribal affiliations of all study participants, and the identity of study programs and participating tribal communities. – Access to these data will only be granted to individuals from institutes of higher education and research organizations. Tribal communities may have access to the data through partnerships with these individuals and organizations. Individuals requesting access will be required to submit an analysis plan for how they will use the data, provide evidence that their plan has been reviewed by an Institutional Review Board, review and acknowledge best practices for uses of the AI/AN FACES data on tribal programs and peoples, and sign a confidentiality pledge agreeing to protect the privacy of the study participants.	• Recognize that the Administration for Children and Families is the steward of AI/AN FACES data with guidance from the AI/AN FACES Workgroup and AI/AN FACES Data Committee, which include tribal early childhood researchers, tribal Head Start directors, and other tribal community representatives – Recognize that the Administration for Children and Families will grant access to AI/AN FACES data for qualified researchers to conduct secondary analyses of the data. – Collaborate with Mathematica, the Administration for Children and Families, Office of Planning, Research, and Evaluation, and the AI/AN FACES Workgroup to develop procedures for ensuring that data from the study are used accurately, ethically, and to the benefit of Region XI children and families. – Recognize that individual program or tribal community review or approval of products (e.g. reports, presentations) will not be obtained; the AI/AN FACES Workgroup and the AI/AN FACES Data Committee will provide guidance on AI/AN FACES data products (e.g. reports, presentations). – Recognize that no data will be returned to individual tribal programs or communities.

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Appendix D

Case Studies Complementing the Survey

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Case Studies Complementing the Survey

We recommend considering an option for case studies using qualitative methods to explore particular topics more deeply while infusing community context and ensuring cultural congruency and relevance. These case studies would sample a smaller number of Tribal Nations and Native American language communities, potentially based on survey responses that reflect the particular topics of the case studies.

1. Sampling

Unlike the survey, case studies will focus on a small sample of Tribal Nations and Native American language communities. The case studies will not be a census, but rather a more in-depth exploration of topics covered in the survey in a subset of the Tribal Nations and Native American language communities eligible for the survey. The future survey team will purposively select communities, varying on characteristics such as community size, geographical region, and Tribal Nations or Native American language communities that share similarities in their languages. Other characteristics to help identify potential Nations or communities for case studies could come from survey responses, such as the estimates of current language speakers or users or the types of revitalization activities the community has used.

2. Measurement topics

In our discussions with the CWG, several themes emerged as potential topics that would be well suited to in-depth qualitative investigation through case studies (for more details about the topics included in the draft survey, see Attachment 1, Table 1).

Intergenerational transmission came up frequently during discussions as an important topic that Tribal Nations and Native American language communities would like to see represented in the survey. However, a community-level survey might not adequately document intergenerational transmission, as it often happens in informal settings such as the home, where Tribal and community leaders might not directly observe it. Qualitative case studies that can engage members of a given community could be necessary to learn more about intergenerational transmission. These case studies could investigate the domains in which the language passes from one generation to the next, including the home, formal classes at school or a camp, and cultural settings such as sweat lodges and smokehouses. In addition, the case studies could examine the direction of intergenerational transmission. Studies of intergenerational transmission typically focus on the older generation passing the language on to the younger generation, but CWG members noted that in Native American communities the opposite can also happen; a child who learns the language in school or at a camp can bring it home and share it with their parents or grandparents.

Using cultural activities to revitalize language is another potential theme to explore in case studies. CWG members noted that people tend to use Native American languages more frequently in activities and settings that have a strong cultural identification. Some of these activities include hunting, farming, attending protests, visiting sweat lodges or smokehouses, and creating traditional art and music. Traditional ceremonies and events such as the Canoe Journey in the Pacific Northwest are also frequently the site of increased use of and interest in Native American languages. Case studies could investigate how

communities use these activities to further their revitalization efforts, elevating success stories that other communities could use as models for their own efforts.

CWG members and listening session participants raised the importance of describing ***unmet needs for language revitalization***. They noted that sources of funding for revitalizing language are often competitive, scarce, and unresponsive to the needs of the community. Outside of funding, communities can struggle to access archival data housed by external organizations, which might require community members to travel long distances and go through complicated processes to use resources on their own language. The survey will include questions about unmet needs, but case studies could provide greater detail and help policymakers understand how better to assist Native communities' revitalization efforts.

Another potential topic to investigate in case studies is ***the effects of language revitalization on nonlinguistic outcomes***. CWG members noted that an increase in the number of language speakers is not the only measure of success of a revitalization project. One member observed in their community that, following the start of a revitalization program, high school graduation rates and Tribal enrollment increased. The effects of language revitalization on these other measures could vary widely across communities and might lend itself better to a qualitative case study rather than a national survey.

Some Tribal Nations and Native American language communities have developed ***best practices in building and maintaining an archive of linguistic data***. Archives are a crucial part of language revitalization and an important way to ensure a community will have access to resources on their language into the future. However, archives can be challenging to create and maintain without the requisite technical and linguistic expertise. Case studies could shed light on different communities' best practices in language archives and provide examples for others to follow.

Levels of fluency and attrition emerged during CWG meetings as an important topic to include in the survey. The survey does include some basic questions around language proficiency, but it does not ask for detailed counts of speakers who learned from birth and are fluent or second-language speakers who are fluent. Nor does the survey ask about attrition, when a speaker who learned the language as a child declines in proficiency over time. These questions might be infeasible for community-level representatives but could be appropriate for a case study, which could document the conditions that allow for speakers to achieve and maintain fluency and avoid attrition.

Other themes to explore in case studies could also emerge as the future survey team continues to develop, test, and field the survey. The case studies would require future efforts to develop and test data collection instruments, drawing from experience with the survey.

3. Future design considerations

If ANA pursues this recommendation, the future survey team will have to consider the following in its design plans:

- How will the future survey team identify case study Tribal Nations and Native American language communities?
- What types of respondents would be useful to engage? For example, Elders, language learning providers such as schools, or varied members of households or community individuals?

- How will the future survey team analyze and use qualitative data in a way that aligns with Indigenous Ways of Knowing and the Tribal Nation or language community's data sovereignty?
- What protections will the future survey team guarantee for participants?

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