FIRST PEOPLES' CULTURAL COUNCIL

Framing the Discussion: A Proposal for a National Strategy for the Implementation of Bill C-91

First Peoples' Cultural Council
Heather Bliss, Suzanne Gessner, Tracey Herbert, and Aliana Parker[1]
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Executive Summary

In this paper, we outline a proposal for a national strategy for Indigenous language revitalization in Canada to support the implementation of Bill C-91.[2] Based on our research into Indigenous language legislation around the world, we have found that a national strategy functions as a predictive factor for high-resource support; countries with national strategies are successful in supporting Indigenous communities with language revitalization and countries without national strategies are not (Bliss 2019). We begin by analyzing the national strategies of these successful countries and comparing their contexts with that of Canada. We then outline a proposal for Canada's national strategy, including its overarching goals, governance structures, funding mechanisms, timelines and targets, reporting and accountability measures, and areas of support. Highlights include a call for an Indigenous-led national body and a series of regional organizations to support Indigenous communities, a funding model that provides sustainable core funding to support capacity development and the rebuilding of cultural systems for language transmission, and a comprehensive set of quantifiable targets that are tracked through an Indigenous-informed evaluation system.

1. Introduction

Bill C-91 received royal assent in June 2019. This is a welcome step towards more sustainable support from government for Indigenous language revitalization. However, the legislation alone will not be impactful without an implementation strategy that will facilitate capacity building at the national, regional, and community levels (see Gessner et al. 2019). The objective of this document is to provide justification for a national strategy for Indigenous language revitalization in Canada and to outline a framework for this strategy. The framework is based on research[3] on best practices and global trends

[1] For questions or comments, please contact Tracey Herbert, Chief Executive Officer, at tracey@fpcc.ca.
[2] By "Indigenous language revitalization", we intend this to refer to the whole spectrum of language revitalization from reclamation of sleeping languages to revitalization and maintenance of extant languages. We also note that Indigenous sign languages must be included as part of any strategy for Indigenous languages in Canada.
[3] See Bliss & Creed 2018; Bliss 2018, 2019; Gessner et al. 2018, 2019

1A Boat Ramp Road
Brentwood Bay, B.C.
Canada V8M 1N9
Phone (250) 652-5952
Fax (250) 652-5953
Email info@fpcc.ca
www.fpcc.ca
www.firstvoices.com

in language revitalization, widespread consultation[4] and collaboration with Indigenous communities and language revitalists across Canada and over 30 years of experience[5] supporting Indigenous language revitalization in British Columbia.

2. Background: Why a national strategy is needed

The call for a national strategy to support Indigenous language revitalization in Canada is not new. In its final report, the Truth and Reconciliation Commission of Canada notes that the federal government committed to a national Aboriginal language strategy in 2002 (TRC 2015, p.155), but this commitment remains yet unfulfilled. The Task Force on Aboriginal Languages and Cultures also spoke to the need to coordinate a long-term language revitalization strategy in 2005 (Flamont et al. 2005). Since that time, the call for a national strategy for Indigenous language revitalization has been echoed by many Indigenous organizations and language experts (see, e.g., Meades 2011 for discussion).

Our research on Indigenous language legislation around the world demonstrates that having a national strategy to implement the legislation is a predictive factor for high-resource support (Bliss 2019). Countries such as New Zealand, Wales, Scotland, and Norway have developed and implemented national strategies for Indigenous languages, and as a result have seen improved outcomes for language revitalization. The danger of not backing Indigenous language legislation with a national strategy is evidenced in countries such as Australia and the United States, both of which have legislation but no implementation strategy, and both of which see strikingly little financial support from government for Indigenous language revitalization. In their 2012 evaluation of Australia's National Indigenous Languages Policy, Neumann et al. comment, "*without concrete actions, clear goals and accountability, the National Indigenous Languages Policy will not achieve its intended goals. If the National Policy is to be taken seriously, then it must contain more than aspirational words*" (p. 57).

A national strategy will ensure that Indigenous people and communities receive fair and equitable funding and support for language revitalization, something that has not previously been achieved in Canada. (See Appendix A for challenges with the current funding model.) For language revitalization to be successful, the numbers of speakers and learners needs to increase to a point where there is a stable transmission system in which languages are shared across generations. Moreover, there needs to be ample opportunities for Indigenous languages to be used and valued in homes, schools, workplaces, community venues - all spheres of society.

In order to develop the capacity for this to happen, communities require sustainable multi-year funding rather than sporadic and short-term grants, and this funding needs to be backed by training and resources to ensure communities are successful in their work. Activities and initiatives that focus on the main objectives of increasing speakers, learners, and opportunities for use must be prioritized over those that simply raise awareness about Indigenous languages. The decisions about who receives funding and support and for which initiatives must be made by Indigenous people, and their decision-making must reflect the diversity of Indigenous communities and languages in Canada.

These objectives are all achievable – but only if efforts are coordinated and funding is regulated by a national strategy.

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[4] See Gessner et al. 2017; AFN 2017. FPCC also hosted a virtual 'think tank' meeting on March 31, 2020 with leaders in language revitalization from across Canada to review a first draft of this document. Our thanks to Jaskwaan Bedard, Blaire Gould, Kathryn Michel, Marilyn Shirt, Tye Swallow, and Lorna Williams for their input.
[5] See FPCC 2015

3. Models from other countries

This section provides a high-level summary and comparison of the key components of the national strategies from four countries that have been successful in supporting language revitalization: New Zealand, Wales, Scotland, and Norway.[6] The components are briefly described and then a summary chart in Table 1 details the specifics for each country. This is followed by a second summary chart in Table 2 describing activities and goals for each of the respective strategies.

Governance and oversight

Only Wales and Scotland have an independent body whose function it is to oversee the implementation of Indigenous language legislation. However, in both these and the other countries, there is an acknowledgement that Indigenous language revitalization cross-cuts various social domains and requires mechanisms for cooperation across multiple government bodies.

Funding mechanisms

Whereas Canada's primary mechanism funding for Indigenous languages is competitive grant schemes, New Zealand, Wales, Scotland, and Norway fund Indigenous language revitalization primarily through core multi-year funding agreements, with only a small portion being allocated towards competitive grant schemes. Moreover, provisions in each of these countries' language legislations effectively guarantee the ongoing renewal of funding.

Regionalized or diversified support

Because of the high degree of regional and linguistic diversity in Canada, it is informative to see how other countries acknowledge that different communities have different needs, and what mechanisms they employ to support diversity across regions, communities, and/or languages. While all four strategies include mention of diversity, they will not provide sufficient models for the Canadian context.

Timelines and targets

Timelines are a critical part of setting and achieving targets and benchmarks. Targets are measurable and quantifiable goals, ideally with specified benchmarks that indicate incremental successes. Without timelines and targets, it would be challenging to evaluate the success of the legislation, the national strategy, or the activities and initiatives they encompass. Each of the national strategies implement timelines and targets in slightly different ways.

Reporting and accountability measures

Each of the strategies includes frameworks for reporting on progress towards meeting targets, and/or carrying out objectives. Some also include statistical projections based on the implementation of the current plan.

Three areas of support

All four strategies identify three main areas (the activities and goals of which are detailed in Table 2):

i. LEARN: Increasing numbers of speakers and learners
ii. USE: Increasing opportunities for language use
iii. VALUE: Improving language attitudes/public awareness

[6] These are four of the five countries identified by Bliss (2018) to provide high-resource support for Indigenous language revitalization. The fifth country, Spain, is not included here because its Action Plan for the Basque language has not been updated in over 20 years and is currently under review.

Table 1. Comparison of key components of established national strategies

	New Zealand[7]	Wales[8]	Scotland[9]	Norway[10]
Governance and oversight	- Each area has 3-4 strategic priorities, with a convening Ministry or agency responsible. - Total of 6 ministries/ agencies named: those dealing with culture & heritage, public policy, broadcasting, education, internal affairs, public services	- Welsh Language Division is responsible for oversight. - Various government agencies and institutions involved, including: Health, Education, Digital Services, Business Services, Instructure, Books Council, Broadcast Unit	- Bòrd na Gàidhlig is responsible for oversight. - Mention of "key partners" but no other government agencies or other institutions are explicitly named	- Each area has various measures; most (but not all) name a responsible agency. - In lieu of a named responsible agency, we assume by default the Ministry of Labour and Social Inclusion is responsible. - Most of the agencies are part of the national government (Health (Education, etc.), but also some regional governments and the Sami Parliament.
Funding mechanisms[11]	- Multi-year funding agreements with various Indigenous organizations - Language act mandates purchase agreement is to be submitted annually by Te Mātāwai	- Core funding is allocated to educational centres, etc. - Language Commissioner submits annual budget to Welsh Government	- Ongoing renewable contracts with Gaelic organizations and educational centres - Bòrd na Gàidhlig submits an annual budget to the Scottish Government.	- Regional subsidies are allocated to regional bodies annually. - Sami Act mandates ongoing renewal of language funding to Sámediggi

[7] Data here summarizes details of the Crown Strategy, Maihi Karuna (https://www.tpk.govt.nz/en/a-matou-kaupapa/maihi-karauna), which operates in concert with an Indigenous-led strategy, Te Matawai (https://www.tematawai.maori.nz/maihi-maori-english)
[8] https://gov.wales/cymraeg-2050-welsh-language-strategy
[9] https://www.gaidhlig.scot/bord/the-national-gaelic-language-plan/
[10] The Action Plan is available here: https://www.regjeringen.no/globalassets/upload/fad/vedlegg/sami/hp_2009_samisk_sprak_engelsk.pdf. A 2014 review of the Plan by the UN is available here: https://www.regjeringen.no/globalassets/upload/kmd/sami/same/oversikt_norges_oppfolging_anaya_2014.pdf. Shchukina et al. (2018) also offer a critical review of the Plan.
[11] See Bliss 2018, 2019 for further details and references.

Regionalized or diversified support	- Crown strategy does not specifically include regionalized support - iwi-led regional strategies for education are in development - Support for towns/cities to become bilingual is offered	- Regional units have been identified. - Chief Regional Officers are developing regional plans to maximize strengths and opportunities in each region.	- The Plan has a section on diversity between regions, but offers nothing concrete as a solution.	- The Sami Act[12] of 1987 includes some regional provisions (i.e., only in Sami districts do some provisions apply). - 20% of total government spending on language revitalization goes to municipalities (Bliss 2018)
Timelines	- 5-year Crown Strategy (2018-23) - Each strategic priority has its own timeline within the 5 years	- National Strategy[13] released in 2017 does not have a timeline - 4-year Work Programme[14] outlines objectives for the first four years of the strategy - Annual Action Plans[15] outline how the strategy will be implemented yearly	- 5-year National Plan (2018-23) - Each area lists 5-9 strategic priorities, but none are timelined	- Action Plan developed in 2009; described as "effective for 5 years" but not yet updated - Most (but not all) measures have 1-5 year timelines, all ending by 2014
Targets	3 "audacious goals:" - 1,000,000 speakers with basic proficiency by 2040 - 150,000 people (15+) will use Māori as much as English by 2040 - 85% of population will value Māori as part of national identity by 2040	Targets for 2/3 areas: - 1,000,000 Welsh speakers by 2050 - Increase from 10% to 20% of population that speak Welsh daily, and can speak more than just a few words	No targets listed	Targets not quantified: - Boosted instruction in/of Northern, Lule and Southern Sami at all levels - Increase the use of Sami in the public services for users in all areas of society - Make the Sami language visible to the public

[12] https://www.regjeringen.no/en/dokumenter/the-sami-act-/id449701/
[13] https://gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-welsh-language-strategy.pdf
[14] https://gov.wales/sites/default/files/publications/2018-12/cymraeg-2050-our-plan-for-2017-to-2021_0.pdf
[15] https://gov.wales/sites/default/files/publications/2019-03/cymraeg-2050-a-million-welsh-speakers-action-plan-2019-20.pdf

Reporting and accountability measures	- Annual implementation plan[16] includes activities with funding allocations - Monitoring & Evaluation framework[17] tracks measures against baselines and targets	-Annual reports on progress made on national strategy[18] -Stats Wales tracks actual and projected numbers on speakers and use.[19]		- Every 4 years the Sami Parliament is mandated to prepare a report for the Norwegian King on the status of the Sami languages.[20] - Census data on Sami has not been collected since 1970, and reliable data has not been available since 2000.
Three areas[21]	(i) Learn (ii) See/Hear/Read/Speak (iii) Value	(i) Increasing # of speakers (ii) Increasing use (iii) Creating favourable conditions	(i) Increasing # of learners (ii) Increasing the use of Gaelic (iii) Promoting positive image of Gaelic	(i) Learn (ii) Use (iii) See

[16] https://www.tpk.govt.nz/docs/tpk-maihi-karauna-implementation-plan-en.pdf
[17] https://www.tpk.govt.nz/docs/tpk-maihi-karauna-monitoring-evaluation-framework.pdf
[18] https://gov.wales/welsh-language-strategy-annual-report-2017-2018
[19] https://gov.wales/sites/default/files/publications/2018-12/welsh-speaker-estimates-2011-to-2050-technical-report.pdf
[20] This is mentioned in the preamble to the Action Plan, but we do not have any other information on these reports.
[21] Table 2 provides an overview and highlights of the goals and activities within each of these areas.

Table 2. Comparison of goals and activities in the three areas of established national strategies

	New Zealand	Wales	Scotland	Norway
LEARN	**(i) Family** - n/a (part of the iwi-led strategy)	**(i) Family** - Promote home transmission via health care sector	**(i) Family** - Promote home transmission through national program	**(i) Family** - Develop guidance material for parents
	(ii) Early childhood - Integrate Māori into every ECE[22] by 2025	**(ii) Early childhood** - More immersion nursery schools within 10 years	**(ii) Early childhood** - Increase number of ECEs	**(ii) Early childhood** - Develop curriculum guide for Sami ECEs
	(iii) K-12[23] - Integrate Māori into every school by 2025 - Student retention strategies for immersion - Immersion infrastructure - Digital technologies	**(iii) K-12** - Increase children in immersion to 30% by 2031 and 40% by 2050 - Improve teaching methods so that graduates are proficient speakers	**(iii) K-12** - Build immersion schools in all areas in which > 5% population speaks Gaelic - Develop curriculum for more subjects in Gaelic - Increase number of students learning Gaelic in non-immersion schools	**(iii) K-12** - (Continue to) provide subsidies to schools for Sami bilingual and/or immersion education - Develop curricula and teaching materials - Distance learning network - Introduce funding for small rural schools
	(iv) Post-secondary - Incentivize employers to offer employee language training and rewards	**(iv) Post-secondary** - Increase post-secondary programs in Welsh	**(iv) Post-secondary** - Adult language learning opportunities and resources	**(iv) Post-secondary** - Introduce subsidies for language learning Develop and fund 5-year adult immersion program
	(v) Education workforce - Grow supply & capability of immersion teachers	**(v) Education workforce** - Double number of immersion teachers	**(v) Education workforce** - Prioritise immersion teacher recruitment, education, placing, and retention - Certification programs for language assistants and ECE immersion	**(v) Education workforce** - Fund training for Sami immersion ECE teachers - Teacher recruitment and training - Advanced teacher training

[22] Different labels are used for the equivalent of ECE (=Early Childhood Education) in the different plans (e.g., ECL, kindergarten)
[23] Different labels are used for the equivalent of K-12 in the different plans (e.g., primary, secondary, intermediate, statutory)

	New Zealand	Wales	Scotland	Norway
USE	**(i) Public Services** - Promote Māori use via social service agencies - Support government departments to develop language plans - Recruit/train Māori speakers for public service - (Continue to) publish bilingual documents and offer translators	**(i) Public Services** - (Continue to) publish bilingual documents and offer translators - Develop marketing strategies to encourage use of Welsh services/resources - Improve health care	**(i) Public Services** - Better supervise compliance with the Act - Recruit/train interpreters - Review emergency and child welfare services - Recruit/train health care, police, and corrections staff - Translate public documents - Develop phrasebooks for health and dental care	**(i) Public Services** - Better supervise compliance with the Sami Act - Recruit/train interpreters - Review emergency and child welfare services - Recruit/train health care, police, and corrections staff - Translate public documents - Develop phrasebooks for health and dental care
	(ii) Workplace (see Value - Economy)	**(ii) Workplace** - Promote Welsh in the workplace (internal and external communications) - Workplace training	**(ii) Workplace** - Establish initiative to promote Gaelic in the workplace - Support employers to develop language plans - Increase apprenticeships	**(ii) Workplace**
	(iii) Other organizations - Promote Māori use in local and national organizations (e.g. sports clubs) - Support and fund bilingual initiatives in municipalities - Invest in development of marae (cultural centres)	**(iii) Other organizations** - Support bilingual initiatives in municipalities - Public awareness campaign for fluent speakers to better support learners	**(iii) Other organizations** - Develop initiatives for youth activities in Gaelic - Establish fund for community projects - Develop urban plan - Strengthen arts sector	**(iii) Other organizations** - Subsidize bible and religious text translation
	(iv) Documentation - Develop digitization policy - Develop storage and access policies	**(iv) Documentation** (see Value - Media/online)	**(iv) Documentation** - Establish fund for youth to create digital projects -	**(iv) Documentation** - Dictionaries - Correction tools

	New Zealand	Wales	Scotland	Norway
VALUE	**(i) Culture and Identity** - Fund entities that deliver arts, culture, and heritage initiatives - Promote public engagement at national events	**(i) Culture and Identity** - Encourage Welsh role models to use the language - Create opportunities for language celebrations - Branding for international recognition - Encourage newcomers	**(i) Culture and Identity** - More positive messaging around Gaelic revitalization	**(i) Culture and Identity** - Funding for Sami cultural infrastructure (theatre, publishing house, library) - Purchasing agreements for Sami literature
	(ii) Youth - Provide leadership opportunities for youth - Develop youth-specific media, etc.	**(ii) Youth**	**(ii) Youth**	**(ii) Youth** - Conference on developing Sami-speaking meeting places for children and youth
	(iii) Media / Online - Create online content linking public with Māori values - Increase commissions for high-quality broadcast and online content - Enable Māori to create and broadcast their own content	**(iii) Media / Online** - Speech-to-text technology - Other digital resources - Increase and improve public broadcasting - Increase content and programs	**(iii) Media / Online** - Public broadcasting	**(iii) Media / Online** - Increase web presence and online resources - Continue radio and television broadcasts - Subsidize Sami newspapers - Subsidize Sami films
	(iv) Economy - Research economic/social benefits of Māori in the workplace - Work with employers to increase opportunities	**(iv) Economy** - Support entrepreneurship - Grow tourism sector - Support for agriculture - Grow translation sector	**(iv) Economy** - Support local authorities and public bodies to develop language plans - Communicate economic value of Gaelic to businesses and individuals	**(iv) Economy**

4. Comparison with Canada

The models from New Zealand, Wales, Scotland, and Norway provide a good starting point for designing a national strategy for Canada. However, there are certain key differences between Canada and these other countries that require innovative solutions for Canada.

Language diversity

In New Zealand, Wales, and Scotland, there is only one Indigenous language in each country, and in Norway there are four related Sami languages. In comparison, in Canada there are approximately 65-70 Indigenous languages from ten different language families. Developing and implementing a strategy that provides a diversity of supports for the diversity of languages in Canada will require input from stakeholders in many language communities. Even for something seemingly straightforward such as identifying the number of languages in a region requires consultation with Indigenous experts in that region, as the boundaries between distinct languages versus dialects of a language can be difficult for outsiders to determine (see Gessner et al. 2018 on languages vs. dialects in B.C.)

Language vitality

According to the UNESCO Interactive Atlas of the World's Languages in Danger (Moseley 2010), the Indigenous languages in New Zealand, Wales, Scotland, and Norway have overall higher levels of vitality than those in Canada. This is summarized in Table 3. The fact that many of the Indigenous languages in Canada are low on the scale of language vitality means that an urgent response and long-term commitments to building capacity and strengthening vitality are needed.

Table 3. Language vitality in five countries

Country	**Language(s)**	**Vitality**	**Ranking**[24] **(1 = safe; 6 = extinct)**
New Zealand	Māori	Vulnerable	2
Wales	Wales	Vulnerable	2
Scotland	Scots Gaelic	definitely endangered	3
Norway	Sami (4)	definitely to severely endangered	3-4
Canada	87 languages	vulnerable (25%) definitely endangered (7%) severely endangered (28%) critically endangered or extinct (40%)	 2-3 (32%) 4-6 (68%)

Land mass

Canada is much larger than the other four countries, as summarized in Table 4. Our large land mass creates challenges for centralized programming and administration. Moreover, topographical features can restrict transportation to urban areas if programming is centered there. There is a strong need for in-community initiatives.

[24] Rankings and labels for vitality labels are taken from the UNESCO Language Vitality and Endangerment Framework. We acknowledge that the term 'sleeping' is preferable to the term 'extinct' but original labels are retained to avoid confusion. Vitality levels may also have shifted since this data was collected in 2010.

Table 4. Land mass of five countries

Country	Area (in square kms)
New Zealand	270,467
Wales	20,735
Scotland	80,077
Norway	323,802
Canada	9,984,670

Diasporic communities

Canada is unique in that the majority of Indigenous people do not reside in their home communities (Statistics Canada 2016). The result is that Indigenous communities are diasporic by definition, and many people of those who need access to their languages do not live in close proximity to Elders, fluent speakers, or other learners. It is critical that the national strategy for Indigenous languages recognize the importance of developing urban and other off-reserve programs along with in-community initiatives so that all Indigenous people – regardless of where they live – have access to their language(s).

Official language status

Unlike Canada, each of the four other countries surveyed have declared Indigenous languages official languages. These declarations mean that public services – including education – are guaranteed in the languages. The challenge in the Canadian context will be to develop a strategy that ensures Indigenous language rights to public services and education without the backing of official language status.

5. Proposal

This section outlines a first proposal for a national strategy for the implementation of Bill C-91. This proposal is meant to be a starting point for dialogue; there are many questions to be addressed collectively and areas to be elaborated based on feedback from language revitalists across Canada.

5.1. Goals

The foundation for a national strategy must be centered around advancing the key goals of language revitalization as follows:

- Every Indigenous person (child, youth, adult, or Elder) has access to formal immersion or bilingual education in their language(s), regardless of whether they live in or away from their home community.

- Every Indigenous person has access to community-based opportunities to learn and use their language, regardless of whether they live in or away from their home community.

- Every Indigenous community has a comprehensive plan for language revitalization with adequate funding and support for implementation.

- Every Indigenous language is documented with an archiving strategy that ensures Indigenous ownership, access, and control of language data.

- Every Indigenous language is nationally recognized with this recognition enacted in local domains such as bilingual signage in each traditional territory.

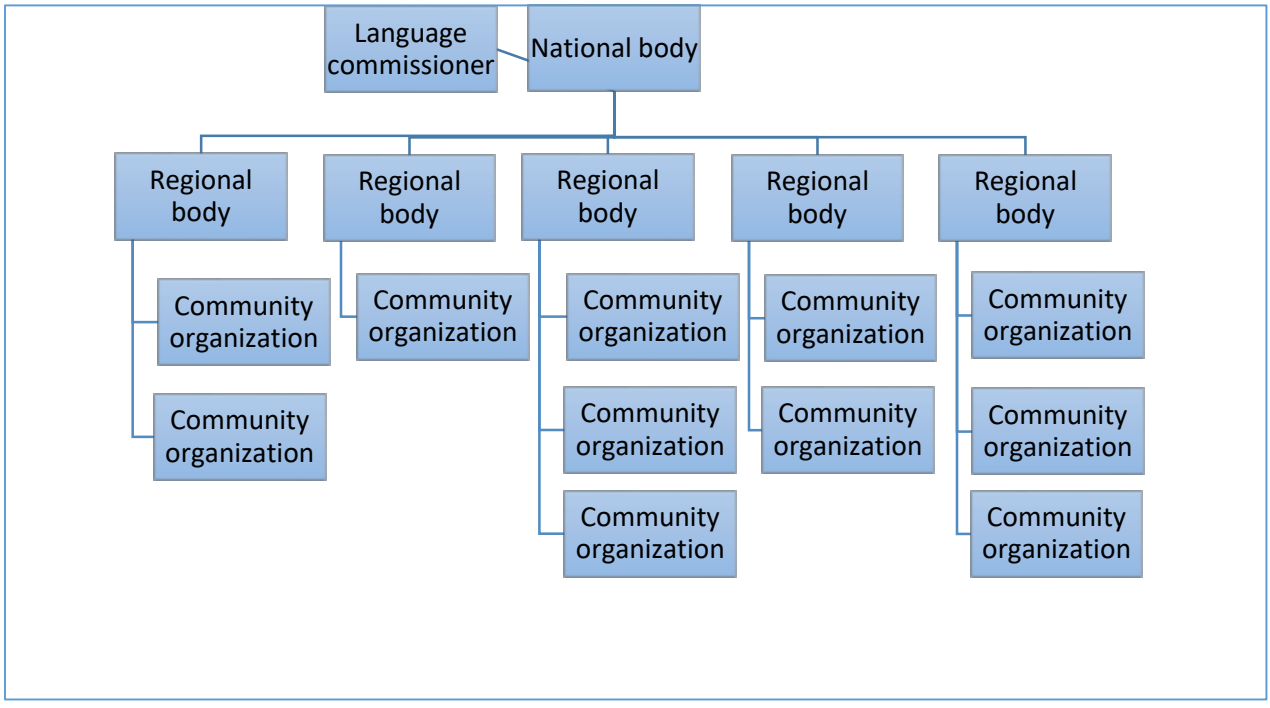
- Government funding and support for Indigenous languages is commensurate with their irreplaceable value as important assets to culture and identity, health and wellness, society and the economy.

- Indigenous language revitalization is led and implemented by Indigenous people. There are career paths and opportunities for Indigenous experts that recognize and value their Indigenous language expertise.

5.2. Governance and oversight

The proposed governance structure recognizes the vast regional and linguistic diversity in Canada through a hierarchical system, as depicted in Figure 1.

Figure 1. Sample organizational structure



In this structure, a national body supports a series of regional bodies (precise number to be determined), which in turn support a series of community organizations (precise number to be determined). A language commissioner provides independent oversight for the national body and its subsidiaries.

The national body will be essential to ensure Indigenous leadership and control of Indigenous language initiatives falling under the legislation. The national body will serve three key roles (Gessner et al. 2019). First, a national organization will manage and distribute the annual budget transfer from the government, including direct transfers for core funding to Indigenous communities, regional and urban organizations along with proposal-based funding for knowledge-transfer activities, bursaries and other language initiatives. (See section 5.2 below for more details on these funding mechanisms.) Second, the national organization will coordinate national initiatives that can be centralized for purposes of collaboration and cost-efficiency, such as a national archive, digital resources, research, and national gatherings and conferences. Third, there is a role to play in government and public liaison such as working with the federal government ministries to provide language infrastructure across all government ministries, educating the general public on the value of Indigenous languages to Canada and promoting their use and coordinating translation and interpretation services where required for federal services.

The call for a national organization has been expressed by many groups over the past decade. Meades (2011) cites an independent evaluation of the Aboriginal Language Initiative (ALI) conducted in 2003 that recommended "*an institution that could receive, distribute, and administer language funds from the federal government and the private sector, providing access to all Aboriginal language groups.*" This evaluation also advocated that this proposed institution provide opportunities for national and regional collaborations and forums such as conferences and workshops for sharing information and resources. According to Meades, the Department of Canadian Heritage (PCH) agreed to these recommendations and committed to investigating the development of an Aboriginal Languages and Culture Centre in 2002. The Task Force on Aboriginal Languages and Cultures made a similar recommendation in 2005 for a National Language Organization with a mandate to preserve and promote Indigenous languages (see Flamont et al. 2005). Meades (2011) recommends the creation of a stand-alone Crown Corporation to administer funding for Indigenous language revitalization, but with a decentralized jury to make funding decisions. More recently, the National Association of Friendship Centres (2018) has also called for the creation of national institute of Indigenous languages in Canada.

The closest equivalent to this proposed national body in the current system is the Indigenous Languages and Cultures Program, which is under PCH. The main problem with this structure is that it is government-controlled, rather than Indigenous-controlled. (See Appendix A for a detailed discussion of challenges with the current system.) Moreover, a significant portion of the funding and support that is needed to advance Indigenous language revitalization is not under the mandate of PCH, but rather relates to education, family and children, public services, and labour and the economy. Given this, we recommend that the proposed national body be independent of PCH and other Ministries and that it be Indigenous-controlled with diverse representation from across the country. It is important that the national body remain small and operate with low overhead costs so as not to filter funding and resources away from Indigenous communities. This model is similar to the Welsh Language Division in Wales.

Under the proposed governance structure in Figure 1, a Language Commissioner will provide independent oversight to the national body. This is consistent with the recommendations of the TRC's 2015 final report, which called for the appointment of an Indigenous language commissioner to "help promote Aboriginal languages and report on the adequacy of federal funding of Aboriginal-languages initiatives." It is also analogous to the situation in Wales, in

which a Welsh Language Commissioner, who is politically independent of the Government, oversees the implementation of the Welsh Language Strategy, including the development of an annual Action Plan in collaboration with other Ministers.[25]

A series of regional bodies will serve as localized liaisons between the national body and Indigenous communities. Under the current system, there are several regional bodies across Canada, three of which function as third-party delivery agents for PCH serving British Columbia, Saskatchewan, and Ontario. We propose the establishment of additional regional bodies, with jurisdictional divisions that facilitate a fair distribution of resources and infrastructure and foster resource-sharing between communities. This means that jurisdictional divisions may not correspond with provincial/territorial boundaries. As a starting point of reference, data on regional divisions are provided in Appendix C.

The regional bodies will not simply function as funding delivery agents, but they will provide training, professional development and resources to support capacity development within communities. They will also undertake research, development and monitoring, as well as government and public liaison at a regional level. First Peoples' Cultural Council (FPCC) serves as an example of how these regional bodies can achieve these outcomes, but the precise implementation will vary from region to region.

Working directly in collaboration with the regional bodies are Indigenous community organizations.[26] These may be First Nations, but also schools, headstarts, Indigenous collectives, non-profits, Friendship Centres, and the like. There is nothing in this governance structure that precludes another level of organization, if appropriate. For example, an organization that provides targeted supports to three communities from different areas all speaking the same language could interface with their regional body, as could the communities themselves.

5.3. Funding mechanisms

While some funding will be required to support national-level initiatives (including the operating costs of the national body and Language Commissioner), the majority of funding must be allocated to regional bodies so that they can support communities. This is similar to the regional subsidy model used in Norway, in which regional bodies receive core funding from the national Sami parliament on an annual basis.

How much funding is needed, and how should funding be divided amongst the regions? Building on research calculating the real costs of Indigenous language revitalization in Canada and abroad (see Appendix A), we recommend an annual budget of $225-290 million for implementing the national strategy. See Appendix B for a breakdown of costs. As for how to allocate funding, the formula used to determine the distribution of funding across regional jurisdictions must reflect (i) the actual numbers of languages and language varieties in each region, as decided by Indigenous communities, and (ii) the states of readiness of Indigenous communities to develop and implement language revitalization plans.

[25] Both the national strategy and the annual action plans are published by the Welsh language division of the Welsh government in accordance with Section 78 of the Government of Wales Act 2006.
[26] For the same reasons that it is critical for the national body to be Indigenous-led it is also critical that community organizations being supported by the national strategy be Indigenous-led.

As for how regional bodies should distribute funding to communities, following Gessner et al. (2019), we advocate that the current merit-based system be largely replaced with a core funding model that provides stable and ongoing financial support to communities. Specifically, we propose that communities be supported by regional bodies with training, resources, and funding to develop and implement their own language revitalization plans[27] with clear strategies, timelines and budgets. Language revitalization plans will vary based on community need and capacity, and will outline objectives for achieving these goals across all populations (e.g., preschool children via language nests, school-aged children via immersion education and extracurricular programs, etc.)

Language revitalization plans will be developed with the support of regional bodies, and once completed they can effectively function as applications for funding, with annual updates to the plans providing a means to ensure annual funding renewals. This places the responsibility for making funding decisions at the regional level, as regional bodies will directly liaise with Indigenous communities and be in a position to evaluate their progression through the stages of readiness and their capacity to successfully carry out proposed projects. Within these regional bodies, funding decisions are best made by a jury comprised of Indigenous experts representing the diversity of communities, languages, and language families of the region. Similarly, evaluation criteria are best determined at the regional level, rather than dictated homogeneously at the national level.

We recognize that not all communities are immediately in a position to develop and implement language revitalization plans, and as a result there will be a gradual transition to the core funding model, with higher-readiness communities receiving this type of funding immediately and lower-readiness communities receiving training, support and resources from regional bodies to work towards language revitalization planning.

To strengthen capacity, lower-readiness communities also need core funding for infrastructure and professional development. For this, we adopt Bliss & Creed's (2018) model for a language team, a dedicated group of staff who coordinate and oversee language projects in the community. As language teams in lower-readiness establish projects and build community support, they will work towards developing language revitalization plans, allowing them to transition to the funding model in which language plans are funded. Once a community transitions to this model, the costs of the language team are included as part of the language plan.

In addition to core funding for community-based language plans or language teams, merit-based funds should be made available to support smaller-scale projects that mobilize community support and/or innovation and new directions for language revitalization.
In terms of funding timelines, all communities require stable and sustainable funding to support the systemic changes that needed to revitalize Indigenous languages. We advise that higher-readiness communities with approved language revitalization plans be provided with 5 years of funding (reviewed and renewed annually) in order to carry out their plans. Lower-readiness communities may be provided with annual funding packages to support their language teams. [28]

[27] FPCC supports Indigenous communities in B.C. through its language revitalization planning program (http://www.fpcc.ca/language/Programs/Language-authority.aspx). See Franks & Gessner (2013) for a guide to language revitalization planning for B.C First Nations communities.
[28] Because the funding for language teams is not merit-based, it should be renewable each year. The short-term timeframe is to allow for budget increases as the team grows and develops its capacity.

As for projects that are funded through merit-based grant programs, depending on their scope, they may have one- to three-year timelines. In all cases, it is critical that communities have at least a full year to complete their projects, rather than a reduced timeframe based on administrative delays.

Whereas under the current model, funding recipients receive no support to ensure they are successful in implementing their projects, under this new model in which funding is filtered to regional bodies, these organizations will provide training, resources, professional development, and other types of support as needed to advance communities' progress towards reaching a stage of high-readiness in which they can develop and implement comprehensive language revitalization plans. Even for communities at this stage, support from regional organizations will be ongoing, as plans and initiatives evolve over time.

5.4. Timelines and targets

The models from other countries approximately converge on a five-year timeline, with some variation. Whereas New Zealand and Scotland have five-year strategies with provisions for redevelopment at the end of the five-year term, Wales has a long-term strategy with no end date that is accompanied by a four-year work plan as well as an annual action plan. Norway's five-year plan seemingly expired without renewal or redevelopment.

Wales' adoption of a long-term strategy with shorter-term work plans is compelling, as the broad objective of stabilizing a language will take many generations, stretching well beyond five years. However, without a clear end date, there is a risk that the action items in the strategy will not be prioritized as urgent. Moreover, there seems a high administrative burden associated with Wales' various strategies and plans, each with their own reporting requirements. In the interest of avoiding high overhead costs so that funding can be filtered to communities, a more streamlined approach would be prudent.

A reasonable "middle ground" proposal would be to develop a twenty-year national strategy under which the regional bodies could each develop five-year regional action plans. Each of these documents must include provisions for redevelopment at the end of each term. The motivation for a multi-decade strategy is supported by statistical models developed for Māori suggesting that, even with sustained support, growth in speaker populations for threatened languages is exceedingly slow, taking over 100 years to double from 4% to 8% (Ruckstuhl & Wright 2015)[29]. The twenty-year time window is based on research suggesting that, with sustained support, a mid-readiness community with mid-range language vitality can transition to a language maintenance model within fifteen to twenty years (Bliss & Creed 2018). As for the five-year regional action plans, these would provide more specific goals and actions with clear timelines, best determined on a region-by-region basis.

Quantifiable targets supported by research into what is required but reasonable should be specified for both the national and regional plans. With its longer timeline, the national plan can

[29] 4% is the percentage of the New Zealand population that considers themselves fluent (as reported by Ruckstuhl & Wright 2015). 21% of the Māori population considers themselves fluent. By comparison, 3% of Indigenous people in B.C. consider themselves fluent (Dunlop et al. 2018), and 15.6% of Indigenous people in Canada report being able to conduct a conversation in an Indigenous language (Statistics Canada 2017).

set targets directly related to increasing proficiency, use, and value, whereas the regional plans can set targets related to building capacity and infrastructure to support long-term goals. More research is needed to quantify targets, but a sample framework with example targets is provided in Table 5 below (in which 'xx' functions as a variable, standing in for a number to be specified based on empirical research).

Table 5. Sample framework for national and regional targets

	National (20-year)	**Regional (5-year)**
LEARN	xx people with basic proficiency in one or more Indigenous language xx languages reversed speaker decline xx languages slowed speaker decline	xx ECE immersion programs (e.g., language nests) xx K-12 immersion xx adult immersion xx skills development programs (e.g., teacher education)
USE	xx people use the language in the home xx people use the language in the workplace xx people use more/as often as official language(s)	xx language archives developed xx public services available in xx languages xx workplace language plans developed
VALUE	xx Indigenous people feel positively about Indigenous languages xx non-Indigenous people feel positively about Indigenous languages	xx media (television etc.) programs xx youth programs in xx languages xx tourism initiatives

5.5. Reporting and accountability measures

Tracking progress towards quantifiable targets will require a comprehensive reporting strategy that includes collecting and analyzing data on a number of metrics related to each of the following categories:

- numbers of speakers (at varying levels of fluency)
- numbers of learners
- domains of language use (home, school, workplace, etc.)
- language attitudes
- language programs and resources

Statistics Canada has mechanisms in place to track variables relating to numbers of speakers and domains of use, but their metrics could be improved to better reflect language categories (e.g., a more nuanced reporting of Cree languages, etc.). Moreover, they do not report on metrics related to language attitudes or language programs and resources.

New Zealand's Maori Language Attitudes Survey[30] serves as a model for the former, and FPCC's Report on the Status of First Nations Languages[31] serves as a model for the latter, while also reporting on the number of speakers, semi-speakers, and learners across communities. The by-

[30] https://www.tpk.govt.nz/en/a-matou-mohiotanga/language/summary-sheet-of-the-2009-maori-language-attitudes/online/4
[31] Dunlop et al. 2018

community reporting model allows for correlations to be drawn between language programs and resources and their impacts on increasing proficiency and opportunities for language use.

We recommend a reporting strategy that incorporates collaboration with Statistics Canada to benefit from their infrastructure and expertise but builds in additional metrics that are tracked at the regional level in order to capture data on learners, attitudes, programs, and resources. Table 6 outlines a series of metrics for each of the categories listed above.

Table 6. Sample metrics for tracking language revitalization progress

Speakers	- number of first language speakers of an Indigenous language - number and proportion of people able to conduct a conversation in an Indigenous language - number of people receiving at least xx hours of formal instruction in speaking an Indigenous language over a 12 month period
Learners	- number and proportion of preschool-aged children immersed in an Indigenous language at home or in a childcare facility - number and proportion of {primary/secondary/postsecondary} students enrolled in an Indigenous language immersion program - number and proportion of {primary/secondary/postsecondary students receiving formal (non-immersion) instruction in an Indigenous language - number and proportion of adults enrolled in an Indigenous language immersion program (e.g., Mentor-Apprentice program, language house) - number and proportion of adults receiving other Indigenous language instruction (e.g., community classes, etc.) - number of other opportunities for language learning
Domains of language use	- number and proportion of people who speak an Indigenous language {at home/in the workplace/at school/in the community} - proportions of time spent speaking an Indigenous language (vs. the dominant language, e.g., English or French) - number of {workplaces/community organizations/educational institutions} that promote Indigenous language use - number of people employed in language revitalization
Language attitudes	- number of Indigenous people who value Indigenous languages as part of their identity - number of Indigenous people who support language revitalization initiatives in their community - number of Indigenous parents who prioritize Indigenous language learning for their children - number of non-Indigenous people who value and support Indigenous language revitalization in Canada
Programs and resources	- number of {preschool/primary/secondary/postsecondary} Indigenous language immersion programs - number of {preschool/primary/secondary/postsecondary} Indigenous language education programs (non-immersion) - number of community mobilization projects - number and quality of curricula and teaching resources - number and quality of language archives - number and quality of language technologies - number and quality of media and art projects in the language

5.6. Three areas of support

Following the models from New Zealand, Wales, Scotland and Norway, we advocate for a model with three areas of support: LEARN, USE, and VALUE. Under each of these, we identify a series of domains, each of which includes a set of sample initiatives. This domain-based approach will best facilitate collaboration between the national body and Government of Canada Ministries whose mandates align with each of the initiatives. Although federal funding and support for Indigenous languages has been primarily overseen by PCH (with Indigenous language education overseen by Indigenous Services Canada), under the proposed domain-based approach there are opportunities for other ministries to be involved, such as the Ministries of Health, Families, Children & Social Development, Diversity, Inclusion & Youth, and Employment and Social Development. Regional initiatives will vary from jurisdiction to jurisdiction and will include more specific goals and activities and include more community-level programming. While not exhaustive, the sample initiatives outlined here reflect many of the suggestions put forward through cross-country engagement sessions held during the development of the Indigenous Languages Act (Gessner et al. 2017, Assembly of First Nations 2017).

First with respect to LEARN, the area of support focused on increasing numbers of speakers and learners, this is divided into two sub-areas: community-based and education-based learning. This division is important as it acknowledges that, for language revitalization to succeed, language learning cannot be confined to the formal education system. While K-12 and postsecondary language education programs can provide some mechanisms for Indigenous people to learn their languages, in order for communities to re-establish the cultural systems that are needed for languages to be passed down across generations, home- and community-based opportunities for language learning must be supported.

Particularly because the education system played a major role in the erosion of Indigenous languages (see TRC 2015), it is critical that community-based language teaching and learning be prioritized, with formal education systems supplementing community-based programs. As noted by McCarty & Nicholas (2014), formal education programs "*…represent one important means for language reclamation, ideally employed in concert with family, community, and other governmental and nongovernmental supports*" (p. 130).

Table 7 details the domains and sample initiatives for community-based and education-based language learning.

Table 7. LEARN domains and initiatives

Domain	Sample Initiatives
Community-based supports for language learning	
Family	- Home immersion programs
Early childhood	- Preschool immersion programs (Language nests) - Language programs at all day cares, early childhood centres, head starts, preschools, etc.
Youth	- Youth immersion programs - Grant program for youth-driven initiatives - Bursary programs
Adults	- Adult immersion programs - Other community-based language programs (core language classes, language on the land initiatives, etc.) - Programs for silent speakers - Programs for Elders
Urban and off-reserve populations	- National action plan for those living away from their homelands[32] - Urban immersion and core language programs - Bursary programs for individuals to attend language learning programs in homeland communities - Digital access to language learning resources
Education-based supports for language learning	
K-12 education	- National action plan for immersion education (concerted effort to build immersion workforce, improve educational outcomes, engage parents and communities) - Development of infrastructure, curriculum, and capacity for immersion schools - K-6 immersion streams at on-reserve schools and immersion or core language streams available for all Indigenous students at off-reserve public schools - Options for Grade 7-12 immersion or core language education available for all Indigenous students
Postsecondary	- Indigenous immersion education and proficiency development programs at postsecondary institutions - Scholarship and apprenticeship grant programs to incentivize enrolments - Indigenization of program design, degree design, curriculum, instructional practices and assessment - Capacity building, knowledge transfer and knowledge mobilization

Regarding USE, this area of support is focused on increasing opportunities for Indigenous languages to be heard and used in all spheres of society, including physical spaces like homes, schools, workplaces, and community venues, as well as virtual spaces that can connect Indigenous people with each other and their languages. A big part of increasing language use is assessing current patterns and engaging in strategic planning at the community and

[32] This initiative is listed under LEARN but also incorporates aspects of USE and VALUE. As described in the discussion of diasporic communities in section 4, it is critical that all Indigenous people can access their language(s) regardless of their Indian Act status or place of residence.

organizational levels, as well as documenting languages so that resources can be developed and shared. Table 8 details the domains and sample initiatives for language use.

Table 8. USE domains and initiatives

Domain	Sample Initiatives
Communities	- Support status assessment of each language - Support capacity building and the sharing of language resources - Support the development of community language plans
Workplaces	- Grant programs for businesses to incorporate Indigenous languages into the workplace - Grant programs for development of new Indigenous language-focused businesses - Job creation for community language teams, language planning specialists, and language-related positions in the health sector
Urban Friendship Centres and other groups	- Grant programs for language circles and other programs that connect speakers and learners - Creation of connected spaces and digital resource centres at Friendship Centres to facilitate online language sharing
Other organizations	- Grant programs for organizations (sports clubs, arts centres, etc.) to incorporate Indigenous languages into their programming
Public services	- Translation services available for government services in all Indigenous languages (where requested)[33]
Language documentation	- Research into digital strategies - National Indigenous language archive hosted by national Indigenous body[34] - Tri-council funding specifically for language documentation

Finally with respect to VALUE, this area of support is focused on improving language attitudes and increasing language awareness amongst both Indigenous and non-Indigenous populations. Educating people about the value of Indigenous languages in terms of their benefits to culture and identity, health and wellness, society and the economy is a key part of the national strategy, as this will help to ensure ongoing support. However, while critical, increasing language awareness is just one small part of a comprehensive strategy for language revitalization, and the majority of funding must be filtered towards the LEARN and USE areas. Table 9 details the domains and sample initiatives for language attitudes and awareness.

[33] Translations of public documents into Indigenous languages should be restricted to contexts where requested by Indigenous communities. In most cases, this will be for languages with a large number of speakers who also read and write their languages. For languages with very few speakers, focusing those speakers' efforts on translations may prevent them from doing other important revitalization work such as teaching or mentoring learners.

[34] Many communities may prefer to archive their language materials locally, rather than in a centralized location. However, with digital media there are opportunities for archiving in multiple locations, and a national archive should be available for those who wish to make use of it.

Table 9. VALUE domains and initiatives

Domain	Sample Initiatives
Culture & identity	- Support communities to pass their own laws to govern their languages - Right of access to language in Indigenous sign languages, and language for all individuals with disabilities or special abilities - Respect Indigenous language orthographies and permit individuals to register Indigenous names on government documents - Collaborate with Indigenous people to restore place names in Indigenous languages - Bilingual signs in each Indigenous territory
Promotion	- Build decolonization practices and positive language promotion into all language programs and services program at all age levels - Make provisions to shift the past colonial attitude toward Indigenous people by the public service - Awareness campaigns for expectant parents and parents of young children - Awareness campaigns for families - Promotion campaigns at schools, sports clubs, etc. - Education campaigns for the general public
Media	- Increase public broadcasting in Indigenous languages - Grants for development of film and television programming
Economy	- Research to demonstrate links between Indigenous language revitalization and economic development[35] - Awareness campaigns to raise economic profile of Indigenous languages and their revitalization - Promotion campaigns to support Indigenous economic development centered around language
Urban centres	- Grant funding for festivals and other activities that promote and celebrate Indigenous language diversity in urban centre - Awareness campaigns to encourage urban Indigenous people to seek language learning and use opportunities

6. Summary

In order for the *Indigenous Languages Act* to achieve its intended goals, a strong national strategy for Indigenous language revitalization is critical (§2). We intend this paper to inform the discussion around the development of a national strategy as a key component of the implementation of the Act. Successful models from other countries (§3) provide a good starting point although there are certain key differences between Canada and these other countries that require innovative solutions for Canada (§4).

The foundation of the strategy must be centered around advancing the essential goals of language revitalization (§5.1), ensuring that each Indigenous person in Canada can exercise their

[35] While there is a small body of research demonstrating the value of Indigenous languages for economic development (e.g., Aleksy-Szucsich 2008; Skutnabb-Kangas 2002) and the potential for job creation from Indigenous language revitalization (e.g., Pine & Meades 2016), much more research into these linkages is needed.

right to language. Along with the Office of the Commissioner of Indigenous Languages which was mandated by the Act, we advocate for an Indigenous-led national body and a series of regional organizations to support Indigenous communities in their work (§5.2). Implementation of the national strategy will initially require an annual budget of $225-290 million, and increases in funding will be needed over time. We recommend that the current merit-based funding system be largely replaced with a core funding model that provides stable and ongoing financial support to components of the proposed governance structure (§5.3).

Timelines and targets (§5.4) along with robust reporting and accountability measures (§5.5) are fundamental. For timelines, we recommend a twenty-year national strategy under which the regional bodies could each develop five-year regional action plans. A sample framework of accountability metrics is provided including numbers of speakers and learners, domains of language use, language attitudes, and language programs and resources.

The details of the strategy (§5.5) are framed within three areas of support:

i. LEARN: Increasing numbers of speakers and learners
ii. USE: Increasing opportunities for language use
iii. VALUE: Improving language attitudes/public awareness

The majority of funding must be filtered towards the LEARN and USE areas. We suggest sample initiatives for each domain; these will be the basis for action plans resulting from the strategy.

The diversity of Indigenous languages and people in Canada calls for diverse perspectives on this proposed national strategy. We invite you to contact us with your feedback.

Appendix A. Challenges with the current funding model

The ALI was first introduced in 1998 and since then has been the primary mechanism for Indigenous communities to access federal government funding for language revitalization. A 2015 evaluation of the ALI recommended that PCH assess the feasibility of developing a language strategy in order to optimize ALI funding (PCH 2015). While a full-scale strategy was never developed, the ALI was marginally updated following Bill C-91 to what is currently referred to as the Indigenous Languages Component (ILC) of the Indigenous Languages and Cultures Program.[36] Even with this update, there remain a number of challenges with the current model, as follows:

Insufficient funding

Between 2009/10 and 2013/14, the ALI expenditures were $22.1 million (average $5.5 million per year). Over 15% of this went to administration costs, leaving $18.6 million for grant funding (PCH 2015). With the passing of Bill C-91, the ALI budget was increased to $334 million over 5 years. This averages to $66.8 million per year, but the annual budgets increase incrementally as follows:

- 2019/2020: $15 million
- 2020/2021: $44 million
- 2021/2022: $72 million
- 2022/2023: $87 million
- 2023/2024 (and henceforth): $116 million

Between 2009/10 and 2013/14, the average grant was $40,793 (PCH 2015).[37] This level of grant funding has not met the needs of applicants; between 1998 and 2011, less than 25% of successful applications were fully funded and the average project received 66% of its requested budget (Meades 2011).

Even with the budget increase in 2017, the funding provided by the ALI - as well as its replacement, the ILC - falls far below what has been recommended and what other nations actually spend.

Regarding funding recommendations, Bliss & Creed (2018) calculate the actual costs of language revitalization for Indigenous communities in Canada over a fifteen-year period. Abstracting away from variances between communities and across time, the average per-year cost per community was calculated at $5.37 million. This figure includes the costs associated with the following:

- Community programs
- K-12 education
- Adult skills training (via formal postsecondary education programs)
- Language documentation

[36] https://www.canada.ca/en/canadian-heritage/services/funding/aboriginal-peoples/languages.html
[37] Although this was the average reported for grants awarded directly from PCH, those awarded by FPCC (a third-party delivery agent) were much smaller because funding was not regionally allocated in a way that recognized B.C.'s greater number of languages and communities. In order for B.C. languages and communities to have fair access, FPCC had to offer smaller grants.

- Media and arts

Drummond and Kachuck Rosenbluth (2018) review spending in Indigenous communities in Canada and abroad, as well as costing data from Bliss & Creed, the Assembly of First Nations (AFN), and FPCC, and develop aggregate summaries based on these sources.[38] They recommend that funding be incrementally increased over a 10-year period while community capacity is developed, and they conclude:

> *"We find it unlikely that First Nations language objectives can be reached if, by several years into the initiative, funding of at least $500 million a year is not available. That would be a total for education and lifelong learning, with education likely somewhat higher than half the total. The required funding could, however, be considerably higher."*

Regarding spending on language revitalization in other countries, Bliss (2018) calculated the total spending for 10 countries around the world and found that New Zealand, Wales, Norway, and Scotland are all "high-resource" countries that spend significantly more than other countries, including Canada. Meanwhile, with only one Indigenous language or language family in each of these other countries, their expenses are much lower than what is needed in Canada.

These figures – stated as per capita values in CAD for comparison purposes - are given in Table 10 below. (See also Appendix B for a discussion of funding amounts under the current proposal.)

Table 10. Estimated and actual costs of Indigenous language revitalization

	per person (Indigenous population)	**per person (total population)[39]**
Estimated Costs		
Bliss & Creed 2018	$2509	$114
Drummond & Kachuck Rosenbluth 2018	$448	$20
Actual Costs		
New Zealand	$267	$40
Wales	$109	$20
Norway	$783	$8
Scotland	$526	$8
Canada – pre 2017	$13	$0.60
Canada – 2017-2020	$40	$2

Merit-based funding only

The current model distributes funds entirely based on a competitive grant scheme, which creates a cycle of inequality whereby high capacity communities are able to compete for and access funds, thereby increasing their capacity even more, while lower capacity communities remain at a deficit. None of the high-resource countries evaluated by Bliss (2019) use

[38] Drummond & Kachuck Rosenbluth's estimates do not include costs for Inuit and Métis communities.
[39] Given the differences in population sizes and relative proportions of Indigenous populations across these countries, the per-capita (total population) figure is likely a less reliable measure than the per-capita (Indigenous population).

competitive grant schemes as their primary funding mechanism, and there are numerous criticisms of low-resource countries that do (see, e.g., Neumann et al. 2012 on Australia.) Regarding the ALI in particular, the Task Force on Aboriginal Languages & Cultures commented in their 2005 report that, "*communities are put in the position of competing for the limited funding currently available. Inequities result, as communities that have personnel skilled in preparing grant proposals or those with larger populations and greater administrative capacity are in a better position to receive funding for language initiatives*" (Flamont et al. 2005, p. 65).

No multi-year funding

As far back as 2002, evaluations of the ALI have recommended allowing for multi-year funding in addition to annual grant cycles (see PCH 2015). In order to facilitate long-term planning, carry out larger projects, and increase community capacity, the current program must provide funding for longer periods of time.

Inaccurate formula for calculating regional distribution of funds

The regional formula that determines the allocations of funding does not appropriately recognize regional language distribution. A single language list is used to determine the distribution of funds across provinces, and this list has not been approved by Indigenous communities and does not treat dialect divergences equally across the country.

Lack of acknowledgement of diversity

There are 634 First Nations communities[40] in Canada with approximately 65-70 languages from ten diverse language families. All are subject to the same constraints under the ILC, and aside from communities in B.C., Saskatchewan, and Ontario, all apply directly to PCH for funding. This "one-size-fits-all" approach has been heavily criticized as it does not acknowledge the unique strengths and challenges of different communities and regions across Canada (see, e.g., Fontaine, Leitch, and Bear Nicholas 2019, who call for regional language institutes.) Even in countries such as New Zealand, Wales, and Norway - with far less linguistic diversity than Canada - there are regionalized approaches to implementing their national strategies for language revitalization.

No mechanisms to ensure funded activities actually support language revitalization

Although the program's objectives were revised in 2017 to more closely align with what is needed to support language revitalization, there is no mechanism to ensure that the bulk of funding goes to these types of activities. There is just one funding pool for all types of initiatives, regardless of whether they support language awareness or proficiency development. Because funding is merit-based, this means that initiatives such as games, camps, or websites are competing against proficiency-building initiatives such as Mentor-Apprentice programs or language nests, as well as resource development. Moreover, under the current model, stipends or other types of compensation for program participants are not deemed eligible expenses, meaning that Mentor-Apprentice programs in which apprentices are paid for their time are not eligible for funding. This is discussed in greater detail below. While language awareness is important, it is only one small part of language revitalization, and there needs to be a concerted strategy to support communities more holistically.

[40] This figure does not include Métis or Inuit communities.

Lack of training and support to ensure success

Funding delivered directly via PCH is not supported by any training, resources, or outreach to ensure applicants are successful in carrying out their projects. The need for these support structures cannot be emphasized strongly enough.

In his MA thesis evaluating the impacts of the ALI in Ontario, Meades (2011) notes that over one third of First Nations in Ontario have never been able to access ALI funding, either because they have not had capacity to apply or because their applications were rejected and they failed to re-apply. He argues that this demonstrates a need for community capacity building and training in how to design effective and viable language projects.

Conversely, FPCC's community development approach, which supports grant recipients with training and resources, is leading to sustainable change, with communities mobilizing and developing capacity to create long-term plans for to revitalize their languages. As an example of the success of the community development approach, the number of applicants to FPCC's language revitalization planning program quadrupled over the past two years (from 2016/17 to 2018/19). This increase speaks to the growth in capacity amongst Indigenous communities in B.C., as language revitalization planning is a significant step that requires concerted efforts by trained language revitalists in communities.

Lack of transparency and high overhead

In addition to the historic lack of transparency with respect to how funding applications are evaluated, there is also a lack of transparency with respect to overhead costs, which were on average 15.9% of the ALI budget between 2009/10 and 2013/14 and reached a high of 20.2% during that same period (PCH 2015). It is unclear how these funds are spent, and how they support language revitalization in Canada. Meanwhile, community projects funded by ILC are required to keep their overhead costs below 15%.

Lack of alignment with community needs and objectives

There are various aspects of the ILC that are incongruent with the needs and objectives of (at least some) Indigenous communities, as follows:

- One of the evaluation criteria is organizational capacity, but as noted, there is a strong need for capacity development in many communities, and in fact, this is one of the stated objectives of the program. How will low-readiness communities build capacity if they are required to already have high capacity to receive funding?

- There is no mechanism in the evaluation criteria to ensure that funded activities actually support proficiency development or language use.

- Stipends or other forms of compensation for participants in proficiency development programs are not deemed eligible expenses under the ILC.[41] This means that apprentices or learners in proficiency development programs are not paid for their time, and

[41] In comparison, federal public service employees are compensated under the 'Bilingual Bonus' program for acquiring both English and French (https://www.canada.ca/en/treasury-board-secretariat/services/terms-conditions-employment/bilingualism-bonus.html). Moreover, Canadian youth are financially supported to learn French in the Explore program (https://www.myexplore.ca/en/).

consequently need to prioritize income-earning activities over language-learning activities.

- Applications are evaluated on the basis of whether the activities or resources will be broadly accessible free of charge. Not every community wants to make their language data available in this way, and there should be opportunities for communities to develop resources for their exclusive use if they wish.

- Reporting to PCH on grant-funded activities must be in one of Canada's Official Languages, but Indigenous languages of Canada have not been declared Official Languages. Communities wishing to report in their own Indigenous languages should be permitted to do so, with funding available for translations into French or English for PCH.

Appendix B. Funding amounts

A comprehensive national strategy for language revitalization will require funding not only for community-based language revitalization plans but also for the costs associated with the operations of the national and regional bodies, as well as K-12 education, adult skills training, and language promotion through media, arts, economic development, etc. This appendix considers community-based funding only (community programs for language learning and use, as well as community-based language documentation), while acknowledging that additional funds are needed for these other aspects of support.

According to calculations conducted by Bliss & Creed (2018), the costs associated with the range of community programs that may appear in a comprehensive language revitalization plan total approximately $2.5 million/year. (This figure excludes education, adult skills training, and media and arts). This is the figure we will assume is needed for high-readiness communities.

For low-readiness communities, the priority is to build capacity by establishing a language team. Bliss & Creed's model for a language team includes costs for recruitment, space, operating expenses, professional development and salaries and builds gradually over time as the team and its professional expertise grows. For simplicity's sake, we will assume an annual cost of $125,000/year for the language team, which corresponds approximately to Bliss & Creed's projections for a low-readiness community in early years of capacity development.

Low-readiness communities also need merit-based funding for activities that do not require high levels of community capacity but support capacity development such as community mobilization events, language camps, MAP, silent speaker programs, and small-scale language documentation projects. According to the Bliss & Creed (2018) calculations, the collective annual cost for these initiatives is approximately $200,000, with individual initiatives ranging from $20,000 to $100,000. We will assume that low-readiness communities may seek support for half of these activities, requiring $100,000/year each in merit-based funds.

As low-readiness communities transition towards a stage at which they can implement language revitalization plans, their language teams will grow and the language team budget will increase to approximately $175,000/year. At this stage, these now mid-readiness communities may also seek support for the full range of initiatives described in the preceding paragraph, plus additional projects such as language nests, home immersion programs, and youth leadership programs. The collective costs for all of these is approximately $500,000/year, with individual initiatives ranging from $20,000 to $250,000. This is the figure we will assume is needed for mid-readiness communities.

How many communities are high-, mid-, and low-readiness? We are unaware of cross-national data to address this question, but unpublished data from FPCC suggests the following proportions of B.C. communities in 2017:

- 3% high-readiness
- 13% mid-readiness
- 84% low-readiness

Assuming that these percentages are representative of Canada at large[42], and based on there being 634 First Nations communities in Canada, the total annual costs are as follows:

Table 11. Costs of community-based funding – Years 1-5 (e.g., 2021/22 – 2026/27)

Number of communities	**Per-community costs**	**Total costs**
19 high-readiness communities	$2.5 million/year	$47.5 million/year
82 mid-readiness communities	$675,000/year	$55.4 million/year
533 low-readiness communities	$225,000/year	$119.9 million/year
TOTAL		**$222.8 million/year**
per-capita (Indigenous population)[43]		**$133**

Communities will transition from low- to mid- to high-readiness, thereby increasing costs over time. For example, let's assume that 10% of communities transition from mid- to high-readiness over a five-year period, and 20% transition from low- to mid-readiness in that same period.[44] This leads to the following costs:

Table 12. Costs of community-based funding – Years 6-10 (e.g., 2027/28– 2032/33)

Number of communities	**Per-community costs**	**Total costs**
27 high-readiness communities	$2.5 million/year	$67.5 million/year
181 mid-readiness communities	$675,000/year	$122.2 million/year
426 low-readiness communities	$225,000/year	$95.9 million/year
TOTAL		**$285.6 million/year**
per-capita (Indigenous population)		**$171**

It is important to keep in mind that the costs reflected in these tables are for community program funding only. They exclude K-12 education and post-secondary costs, media and arts funding, as well as costs associated with operating the national and regional bodies. The per-capita figures cited in Tables 11 and 12 are well below those in New Zealand, Norway, and Scotland, but investments in education and national and regional bodies will bring Canada closer to these countries in terms of language revitalization spending.

[42] This assumption is simply a "placeholder" until cross-national data can be collected.
[43] This figure is based on the total number of Indigenous people (First Nations, Métis, and Inuit) as reported in the 2016 census.
[44] These assumptions are also placeholders, in lieu of clear data about the rate at which communities transition through stages of readiness.

Appendix C. Regional bodies

Historically, up to 13 regional third-party delivery agents existed at one time, but this number has shifted, and there are currently 3 third-party delivery agents administering ILC funding. We recommend that regional bodies be established across Canada to administer funding and provide professional development, training, resources, and other supports to communities.

It is critical that regional bodies be managed and staffed by experts in language revitalization. These experts need to understand how to prioritize the primary goals of language revitalization, increasing the numbers of speakers and learners and increasing opportunities for language use. They need to have knowledge and skills to successfully develop and implement programs to support proficiency development across all age and skill levels in a diverse range of Indigenous communities. They must be able to support communities through training and resources.

Few Indigenous organizations currently meet these criteria. Friendship Centres and other cultural organizations may have the networking capacity and understanding of the needs of local Indigenous communities, but in many cases, postsecondary training in language revitalization will be needed for these organizations to build capacity to step into the role. In some regions, there are geographic, linguistic, or sociopolitical barriers that make it challenging to identify a single organization; multiple regional bodies may be needed in some provinces or territories and some regions may cross provincial/territorial boundaries. The establishment of a national body will help to identify appropriate regional divisions, and will allow Indigenous organizations to liaise and support each other, as well as to develop pathways for postsecondary training for language revitalists. Table 13 provides a high-level view of regions across Canada, their respective language diversity, and possible regional bodies for each.

Table 13. Regional divisions

Region	**Language Diversity**[45]	**Proposed Regional Body** (* = current 3rd party delivery agent)
B.C.	7 language families	*First Peoples' Cultural Council (FPCC)
Alberta	3 language families	*to be established*
Saskatchewan	3 language families	*Saskatchewan Indigenous Cultural Centre (SICC)[46]
Manitoba	3 language families	*to be established*
Ontario	2 language families	*First Nations Confederacy of Cultural Education Centres (FNCCEC)[47]
Quebec	3 language families	*to be established*
Maritimes	1 language family	Mi'kmaw Kina'matnewey (MK)[48]
Yukon	2 language families	Yukon Native Language Centre (YNLC)[49]
N.W.T. & Nunavut	3 language families	*to be established*[50]

[45] The number of families is provided as a preliminary measure of language diversity because the number of languages is difficult to assess. There is a strong need for consistent, accurate and Indigenous-informed data on the numbers of language across Canada (see Gessner et al. 2018).
[46] https://sicc.sk.ca/ilc/
[47] http://fnccec.ca/indigenous-languages-and-cultures-program/
[48] http://kinu.ca
[49] http://ynlc.ca/index.html
[50] Within the Department of Education, Culture, and Employment of the Government of the Northwest Territories there is an Indigenous Languages Secretariat. This organization fulfils similar functions to

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