

During the 2025 legislative session, the Legislature passed Senate Memorial 9 (SM9), requesting the Legislative Education Study Committee (LESC) to convene a working group to study and make recommendations for improving the 520 Native American Language and Cultural (NALC) certification. The memorial called for an examination of the broader 520 NALC ecosystem; including organizational structure and accountability, pathways for advancement and professional development, data collection and transparency, and the development of a long-term strategy.

SM9 acknowledges the role of language and culture in supporting educational outcomes and community identity for Native American students. The memorial also recognizes the complexity of historic and systemic inequities that contribute to language and culture loss. Research cited in the memorial indicates access to ancestral language learning is associated with positive academic, cognitive, and social-emotional outcomes for Native American students.

Although SM9 requested the formation of a working group focused on the 520 NALC, LESC staff expanded the scope of study to bilingual education more broadly as many 520 NALC holders teach in bilingual programs. As a result, LESC staff intend to continue work in the 2026 interim to assess the current implementation of the 520 NALC, clarify support structures, and identify strategies that strengthen the certification process in alignment with tribal priorities and state education goals. This policy brief offers a review of the 520 NALC certification process, provides data on number of 520 NALC holders, and summarizes supports for the 520 NALC process and educators available in state agencies.

### Key Takeaways

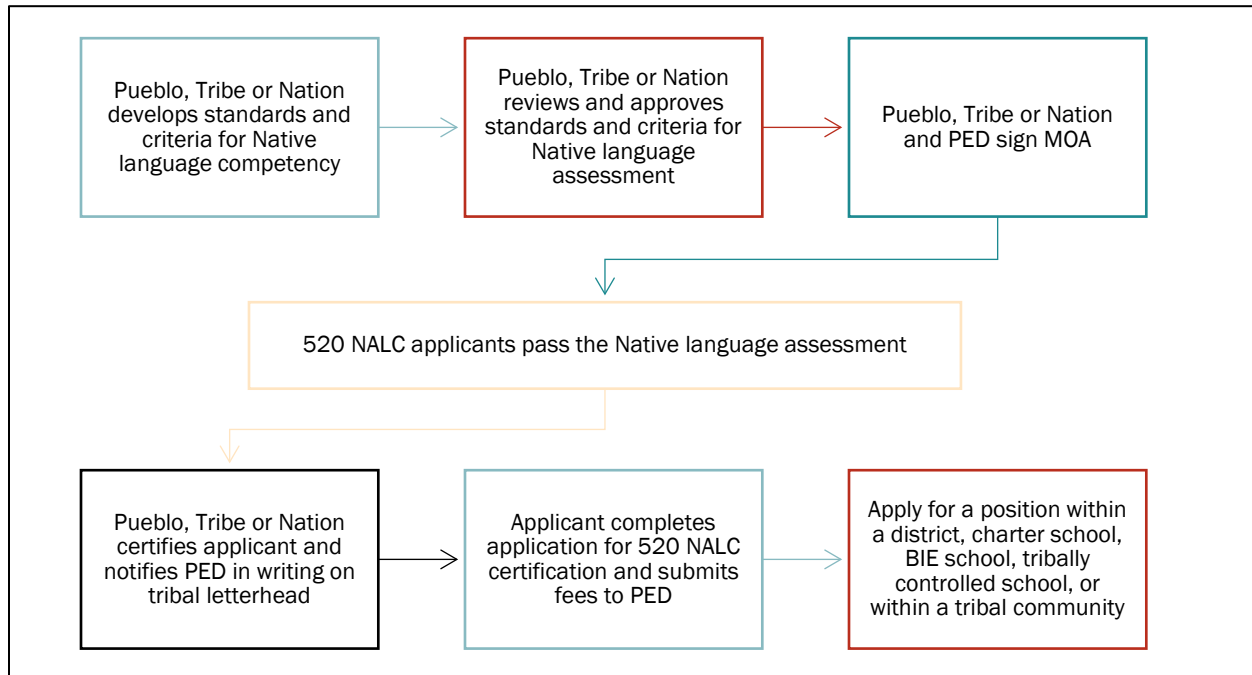
- PED is not tasked with reviewing or approving the standards and criteria developed by tribes and pueblos for determining proficiency and competency (*Pages 1 - 2*).
- A collaborative relationship between the Indian Education Division, the Licensure Bureau, and the Language and Culture Division at PED could positively impact the MOA process, coaching supports, and coordination with tribal partners in the broader process (*Page 3*).
- Many 520 NALC educators encounter a compensation ceiling upon reaching Level 2 (*Page 4*).

## The Evolution of the 520 Native American Language and Culture Certificate

*The NALC certificate was established in 2002 with [House Bill 204](#).* Law in the Public School Code ([Section 22-10-3 NMSA 1978](#)), authorized the then state education board to issue 520 NALC certificates to individuals proficient in the language and culture of a New Mexico tribe, nation, or pueblo, and the law did not require applicants to hold a baccalaureate degree. The state board was also tasked with establishing procedures for issuing and renewing certificates. In 2003, the Legislature recompiled this provision through [House Bill 212](#), placing the NALC certificate in a new section of the Public School Code (Section 22-10A-13 NMSA 1978) as the state transitioned from a state education board to its existing Public Education Department (PED); statutory language remained substantively the same.

*PED operationalized the 520 NALC certificate via rule in [6.63.14 NMAC](#) in 2003, which was later amended in 2006.* See [Figure 1: Certification in Native American Language and Culture Process](#), on the following page. The rule established the standards and procedures for individuals seeking initial or renewed certification to teach the language and culture of their respective tribe, nation, or pueblo in grades kindergarten through 12th grade (K-12). Under the rule, applicants seeking an initial three-year level 1 certificate must meet the competency and language proficiency requirements set by their tribe, nation, or pueblo and provide PED with verification from the appropriate authority. Candidates must also comply with the educator's licensure application fees, background checks, the standards of professional conduct, and the Parental Responsibility Act.

**Figure 1: Certification in Native American Language and Culture Process**



Source: PED

Administrative rule (see [6.63.14 NMAC](#)) authorizes 520 NALC certificate holders to teach Native American language and culture within public school districts and charter schools, permitting instruction in other subject areas if the educator holds an appropriate grade-level license. Furthermore, it requires tribes, nations, and pueblos to develop and maintain their own standards for competency and proficiency, and formalize these standards through a [memorandum of agreement \(MOA\) with PED](#). These standards, criteria, and certification processes must be kept on file with the certifying entity within the tribe, nation, or pueblo and should be referenced in the MOA. For renewal, individuals may obtain a nine-year level 2 certificate upon completion of renewal activities established and verified by the tribe, nation, or pueblo. The renewal process must also include collaboration with the superintendent of the educator’s employing district, ensuring alignment between tribal authority and district oversight.

***The current 520 NALC certificate in statute requires PED to issue certificates to individuals that meet criteria established in a MOA.*** In 2022, the Legislature amended [Section 22-10A-13 NMSA 1978](#) to shift authority from the state board to PED to issue certificates based on criteria established in an MOA with a tribe, nation, or pueblo. Applicants are still not required to hold a baccalaureate degree, and the amendment requires full-time NALC certificate holders working in instructional roles to receive a salary equal to the minimum annual salary for a level 1 licensed teacher, which is currently \$55 thousand annually. MOAs must be renegotiated every four years to ensure the accuracy of certification processes, and PED “shall not review or approve” the standards and criteria developed by tribes, nations, and pueblos for determining proficiency and competency.

## Summary of Interagency Support for NALC Educators

As part of an initial review of the certification process, LESC staff worked with PED and the Higher Education Department (HED) to summarize current efforts to assist 520 NALC certificate seekers and holders. The following section summarizes the key points from those conversations.

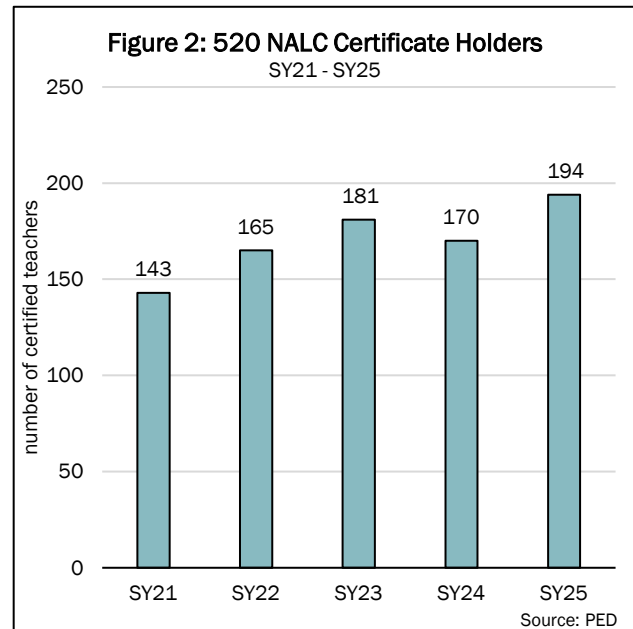
### The Public Education Department

LESC staff met with PED to discuss the current 520 NALC certification process and the department’s role in supporting Native language and culture educators. Within PED, the 520 NALC certification process is currently housed in the Licensure Bureau. PED expressed interest in establishing a clear and collaborative relationship between the Indian Education Division and the Language and Culture Division, potentially leading to a

meaningful role in MOAs, coaching supports, and coordination with tribal partners. As a result, PED is in the process of transitioning leadership of the 520 NALC certification process to the Indian Education Division, which will closely work with the Licensure Bureau and Language and Culture Division. The department's role in supporting the intent of the 520 NALC certification may include the alignment and bridging of its internal bureaus and offices while respecting tribal sovereignty and the spirit of state procedures.

PED data as of October 2025 suggests the highest number of 520 NALC certificate holders actively teaching in public school districts occurred between school years 2023 and 2025 (see **Figure 2: 520 NALC Certificate Holders**). While the number of certificate holders has modestly increased, LESC staff found tribes are not fully aware of the certification process or the extent of their authority within it, and some do not currently operate under a formal MOA with the state.

PED also noted the difference in capacity for certification among tribes and nations. Some communities may lack information, resources, or institutional support that enable full participation. Native nations, pueblos, and tribes retain authority over their languages and cultures, but many may not fully recognize the extent of their control within the existing certification framework. Strengthening awareness, coordination, and partnership between tribes and PED divisions is an important step toward a more effective, equitable, and tribally responsive 520 NALC process.



## The Higher Education Department

HED highlighted the potential for technical assistance centers (TACs) (Laws 2023, Chapter 72) to play a meaningful role in supporting Indigenous language restoration efforts and providing professional learning and technical support to 520 NALC certificate holders. In 2023, the Legislature passed House Bill 280, requiring HED to establish two TACs to support tribal education departments and tribal communities through culturally relevant materials, educator pathways, pedagogical professional development, and coordinated collaboration across federal, state, tribal, and local education agencies and partners. LESC staff spoke with HED to discuss the development of New Mexico's TACs and their potential role in supporting 520 NALC certificate holders as centers for ongoing professional learning; places to help coordinate processes between state agencies and tribes, nations, and pueblos; and how TACs may offer general support for ensuring adequate recruitment of 520 NALC certificate holders. HED provided an update on the status of establishing TACs within the state, noting the development is currently in a procurement process after needing significant planning time to meet a broader and more specialized set of responsibilities than existing technical assistance options for tribes, nations, and pueblos. HED anticipates having an update in January regarding TACs ready to move forward with implementation but noted progress in bilingual and Indigenous language education will require broader systemic change, including shifts in funding, program design, and institutional prioritization.

## Challenges Identified in the 520 NALC Certification Process

SM9 highlights several challenges within the 520 NALC certification process, including systemic inequities and cultural and linguistic barriers that contribute to the loss of cultural identity among Native American students. The memorial also underscores research showing learning one's ancestral language supports cognitive development, strengthens academic performance, and enhances overall well-being by reinforcing cultural identity and community connections.

From 2003 to 2014, 17 tribes, nations, and pueblos entered into MOAs with PED to certify Native language and culture teachers, ensuring tribal sovereignty and expertise remain central to the process. The memorial also

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notes PED's Indian Education Division allocated \$1.325 million in FY25 to support 520 NALC certificates. According to [PED's 2023-2024 Tribal Education Status Report](#), there were 133 active, out of 170 total, 520 NALC certified instructors. Further, 99 students earned the State Seal of Bilingualism-Biliteracy in Indigenous languages, which is a promising option in recruiting students to enter the education field and earn a 520 NALC certificate. Despite this progress, SM9 identifies ongoing issues related to organizational structure, certification procedures, salary implementation, advancement pathways, and alignment with the broader bilingual and multicultural education system. These concerns prompted the memorial's call for a comprehensive review of the 520 certification framework.

**District directors of Native American programs have identified challenges in the 520 NALC certification process including long travel distances to receive training.** In relation to accountability and accessibility, the challenges identified include 520 NALC educators in the northwest region traveling significant distances, often to Window Rock, to complete required training and retrieve or return testing materials. These long commutes result in lost instructional time for students and create additional financial and logistical barriers for educators. Recommending the establishment of regional "hubs" could reduce travel demands, improve efficiency, and allow professional development and assessment activities to take place closer to where educators live and work.

**Directors also cited concerns about limited access to targeted skill development for 520 NALC educators.** In particular, structured, micro-credential professional development opportunities, including assessment administration and grading support, could strengthen teacher capacity and progression. Representatives from the Navajo Nation note the transition from level 1 to level 2 certification alone requires 80 hours of professional development, representing a substantial barrier for many candidates. Recruitment is further complicated by limited capacity within the Navajo Nations Language and Culture unit and a top-heavy feedback structure that slows decision-making and candidate advancement. In this context, regional hubs could also play a role in administering assessments and providing more timely feedback to educators.

**Additional structural challenges were identified regarding advancement, compensation, and staffing capacity, noting many educators encounter a compensation ceiling upon reaching level 2.** This raises broader questions about the feasibility of a level 3 designation and whether a separate or differentiated salary scale should be considered. The discussion also referenced [Arizona's Proposition 301](#) as an example of how stipends could be structured to support and retain language and culture educators. Under this proposition, the Arizona Office of the Auditor General conducts biennial reviews of local education agencies, and tribal gaming revenues designated for education are allocated to the state's [Instructional Improvement Fund \(IIF\)](#). Pursuant to statute, the Arizona Department of Education then distributes funds to school districts and charter schools. At the local levels, there is interest in implementing a "grow-your-own" approach to increase the number of 520 NALC certified teachers.

**Discussion also emphasized the need for improved data systems and transparency.** District educators continue to suggest developing of a centralized data repository to house best practices, instructional resources, and certification data in an accessible and accountable manner for schools and stakeholders. Stakeholders and PED expressed interest in the alignment and information-sharing between the PED's Indian Education Division and the Professional Licensure Bureau, where the 520 NALC is currently housed, including access to data on the number of 520 NALC teachers by tribe and geographic region.

## Policy Considerations and Recommendations

Further analysis of tribal expectations and state structures in supporting tribes, nations, and pueblos and their 520 NALC certificate holders is needed to fully understand how the 520 NALC certificate is currently implemented across the state, including the degree to which existing processes align with tribal educational priorities and broader state goals for bilingualism, cultural preservation, and educator quality. Robust support structures for NALC educators are essential, particularly mentorship, access to instructional resources, and consistent guidance for certificate holders as they enter the classroom, which may include the need for timely data transparency and accountability measures.

### The Legislature should...

- Continue studying the 520 NALC certificate system to understand recruitment and retention trends and determine whether previous policy actions, such as efforts to ensure salary parity for NALC educators, are functioning as intended. This includes evaluating whether recruitment

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incentives are effective, and whether additional strategies are needed to strengthen retention of NALC educators, such as opportunities for accessible professional development and continued high-quality support, and whether salary compensation structures remain equitable.

**The Public Education Department should...**

- Ensure 520 NALC certificate holders receive sustained support in developing instructional and classroom management skills. This will require stronger cross-division coordination between the Language and Culture Bureau, the Indian Education Division, educator preparation units, and data teams. Improved internal partnerships will help streamline processes, accelerate support services, and ensure transparent, appropriate timelines of information sharing with tribes and districts.