July 29, 2013

The Honorable Kathleen Sebelius
Secretary
U.S. Department of Health and Human Services
300 Independence Ave, NW
Washington, DC 20515

Dear Secretary Sebelius:

On July 1, 2013, the Administration for Children and Families (ACF) officially completed the first round of grant competitions under the Head Start Designation Renewal System (DRS). As we look back on the first round, which began in December of 2011, the National Head Start Association would like to provide comments and suggestions to refine this system and improve its ability to support quality across Head Start.

While the Head Start community embraces accountability and strives continuously to raise quality, current DRS procedures raise many concerns about fairness, transparency, and effectiveness. In administering DRS in its current form, we fear that ACF will unintentionally undermine continuous improvement by driving programs into a compliance mindset. We commend ACF for commissioning an evaluation of the process, specifically designed to determine whether or not DRS is accurately and appropriately differentiating between high and low-quality programs. In these days of data-driven programming, there is a plethora of concrete information being collected daily that can be used to determine quality, and we encourage ACF and OHS to utilize multiple sources to determine a full picture of effectiveness. We look forward to the findings of the Urban Institute and Frank Porter Graham Child Development Institute about whether this system is truly improving quality in the way Congress intended and we all desire.

In advance of that analysis, we suggest that to improve subsequent rounds of DRS, ACF and OHS:

1. **Move the DRS process faster and on a more predictable schedule.**

In December of 2011, four full years after the 2007 reauthorization of the Head Start Act, the Office of Head Start (OHS) released the names of those programs that would be included in the first round of DRS competitions. A tentative timeline for the grant process was announced. We thank OHS again for joining the Head Start community at our January 2012 Winter Leadership
institute, and subsequent conferences, to interact with Head Start providers and give as many answers as allowed. However, because OHS fast-tracked the announcement of these grantees and then took a full 18 months to make decisions, many grantees lost valuable staff and community partners in the interim after being publicly labeled "low quality", despite the fact that they were expected to operate more than a full school year longer.

We do understand that in the first round, there are accommodations and growing pains that may not exist in future rounds. We certainly believe that OHS is committed to expediting the process. But we suggest a regular timetable that considers the amount of time grantees and new applicants need both before applying and for potentially transitioning from one grantee to another. Based on input from our members, we propose releasing the list of grants to compete in March, making the Requests for Funding Proposals available in May, and announcing the new grantees the following January before transitioning grantees during the summer months.

2. Improve transparency by releasing competition details and decisions.

After the process began in December 2011, we found ACF was reticent to release details of the competition process. Grant applications were due in July of 2012, but a list of programs chosen to begin negotiations was not released until late April 2013. Further, it was not until July 2, 2013 that ACF released detailed public notice of the new grantees and the size of their grants. We understand that ACF underwent a lengthy vetting process of new grantees, but the lack of transparency over a very long 18 months extended instability for children, families and staff. We hope that in the future, ACF commits to releasing summary details of applications and the distribution of applicants for the competed service areas.

In negotiating grants through this system, we have learned that many communities felt left out of the process, parents in particular. Given the unique role parents play in the Head Start governance structure, we urge ACF to ensure that the entire Head Start collaborative partnership is brought to the table for these discussions.

3. Establish a formal appeals or challenge process for programs that have evidence that their CLASS evaluation was not conducted properly, to allow them recourse before falling into the DRS pool.

As the CLASS assessment tool has been adopted over the past few years, we have seen a huge range in the quality of evaluators and the conditions of evaluations. Anecdotally, programs have told of instances in which CLASS evaluators have conducted observations at times convenient to the evaluator, not the program, with the result that the evaluation only covers a short period of classroom time, or includes recess or nap times or other activities inappropriate for the tool.
Further, we have significant concerns about the applicability of CLASS to dual language learners. Researchers at California’s Campaign for Quality Early Education concluded that “the tool disregards language and culture as important determinants of teacher behavior and pedagogy.” Based on this conclusion affirming our field’s experience, we believe that additional research must be done before this tool is considered to be the best available measure for judging comprehensive classroom quality in bilingual or multilingual settings.

In practice, the picture becomes even more concerning: several dual-language programs have alerted us that some evaluators asked that the day's lesson be conducted in English, ensuring the interaction between teachers and students would be strained during their evaluation. As the CLASS tool becomes a trigger for competition, we urge ACF to consider creating a process in which programs can appeal to their regional office to explain the issue and request a new evaluator and/or a new evaluation.

4. **Treat low CLASS scores as non-compliances rather than immediate deficiencies. If a program receives low-scores then OHS would conduct a follow-up CLASS observation after a specified period of time. Only programs whose scores are still low would face competition.**

CLASS is primarily utilized as a professional development tool; its use is highly specialized and depends on carefully calibrated training and implementation. We see considerable value in the use of CLASS over time to improve the classroom interaction between Head Start teachers and students, but strongly believe that the use of a single CLASS score does not accurately reflect the quality of a program. It would be more responsible to treat low CLASS scores as a "non-compliance" rather than an immediate "deficiency." OHS should require a follow-up observation after a low CLASS score is found to determine whether a score is accurate, particularly if a program’s scores are within a fraction of a point from the threshold for competition. Those with stubbornly low scores after the subsequent visit should be considered for competition.

Additionally, programs are not able to view their CLASS scores after reviewers submit the data. Because CLASS serves as a single trigger, this practice creates an environment in which the program cannot seek to improve appropriately should they be cast into the next pool of competition. Programs should receive timely access to information about CLASS scores in their program. We also suggest that OHS create an annual analysis showing the nation-wide distribution of scores and a breakdown of the actions it plans to take to address common trouble spots across the country. As a community, we believe this will help us all improve and maintain high quality.
5. **Evaluate the way self-reported incidents are included in a grantee’s compliance record.**

When a Head Start program experiences certain types of incidents outside of a monitoring review, it is asked to report these incidents to ACF. For instance, in one program, a child ‘hid’ on the bus as part of his own game and was not discovered until the rest of the students had settled in the classroom—about 25 minutes later. This type of incident is considered an automatic deficiency, regardless of whether or not it indicates a systemic problem with the program. Even if it is the best program in the country with a spotless record, it will be labeled “low quality” and kicked into competition.

As the first round of competitions comes to a close, we feel that ACF should look closely at how this practice may undermine our shared goal of improving quality and consider a ‘second look’ at programs that have no other deficiencies. While we know that the vast majority of programs are managed by upstanding directors who will do as they are required and report incidents to ACF, it is clear that the procedure creates a strong disincentive to report incidents. The practice as it stands only serves to punish good programs while burying real issues that may endanger the lives of the children and families we serve.

6. **Ensure that new applicants are able to demonstrate familiarity with the CLASS evaluation and that they can achieve high quality results in their applications.**

For grants that are recompeted based solely on a program being in the lowest 10% among CLASS scores, we urge OHS to carefully consider how to gauge the ability of new applicants to better the incumbents' scores. Given that all new grantees in the first round of competition operated existing early childhood programs, we recommend that where possible the CLASS tool be used in advance of accepting a non-Head Start agency as a grantee.

7. **Eliminate the 10% component of the CLASS trigger.**

A 10% trigger is an arbitrary line that is not directly related to quality. While the average scores of Head Start programs vary across the domains of CLASS, in some areas nearly all Head Start programs are above national averages for early learning settings including child care providers and state based pre-k, and Head Start programs should not be penalized simply for the sake of a quota. The 10% trigger is also damaging to morale throughout the field, with certain impact on quality, because it causes undue concern in all programs monitored in any given year, even if they have successful triennial reviews and strong CLASS scores. Thresholds should be the only CLASS trigger, and should lead to non-compliances as described above.
We thank you for your time and attention to our suggestions. The Head Start community has a long tradition of quality and continuous improvement, and our members are dedicated to providing the best care and education to the children and families they serve. We look forward to working with you on these recommendations.

Sincerely,

[Signature]

Executive Director
National Head Start Association

C: George Sheldon, ACF Acting Assistant Secretary
   Linda Smith, ACF Deputy Assistant Secretary
   Yvette Sanchez-Fuentes, Director, Office of Head Start
   Roberto Rodriguez, Domestic Policy Council