



NATIONAL HEAD START ASSOCIATION

October 22, 2015

Secretary Sylvia Mathews Burwell
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Burwell,

On behalf of the Head Start community, the National Head Start Association (NHSA) thanks you for your commitment to high quality services for vulnerable children and their families across the country. Over the past five years, the Designation Renewal System (DRS) has been one effort to ensure quality, but a recent analysis by NHSA highlights how unintended consequences of the design of DRS have compromised the intention of DRS and require reforms. In September 2015, NHSA hosted a Designation Renewal System Symposium that included conversations with grantees, former federal officials, former Congressional staff, researchers, and others about how to strengthen DRS for the future. We were pleased to have representatives from the Office of Head Start join us to hear firsthand about the challenges and issues with the current design of the system, and we thank you sincerely for allowing them to participate. The [attached report](#) highlights the outcomes of the first three cycles of DRS and how they lead us to three conclusions:

- The Designation Renewal System does not yet fully meet the Congressional intent of targeting competition at poor quality grantees.
- Basic reforms are needed to make the Designation Renewal System consistent, reasonable, and predictable.
- Conceptual reforms are needed to support programs in working toward high quality, not compliance.

The thoughtful and productive conversations held during the Symposium focused on two major challenges to the system that lead to stress and hypervigilance about compliance for all programs, regardless of quality. While further reforms should be discussed during the next Head Start reauthorization, for now we offer the following concrete recommendations about addressing the major challenges of the system.

10% CLASS Trigger

Currently, the Head Start programs scoring in the lowest 10% for one or more of the three domains of the CLASS tool during each monitoring cycle are required to compete. This tool is used to assess teacher-child interactions in classrooms on a seven point scale, on the domains of Emotional Support, Classroom Organization, and Instructional Support. Because the 10% line is redrawn each year, programs are forced to aim for an unknown and moving target which is very disruptive to planning and innovation. Following their CLASS monitoring event, a program must wait until the following winter to learn whether their scores will require them to compete, and the operational stress this creates is felt at every level and has contributed to staff turnover in many communities.



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Recommendation:

Rather than have moving targets from year to year, the currently low thresholds for required competition due to CLASS (4 for Emotional Support, 3 for Classroom Organization, 2 for Instructional Support) should be increased to levels reflective of minimum quality requirements and the 10% trigger should be removed. Based on National Class Reports released by the Office of Head Start for 2012 through 2014, reasonable thresholds should be set at 5 for Emotional Support, 5 for Classroom Organization, and 2.5 for Instructional Support. These represent ambitious levels of quality that support Head Start's role as a leader in early childhood, with thresholds at the research quality thresholds or above the national averages for each domain in studies of early childhood and pre-K settings conducted by the designers of the CLASS tool. Moving forward, the Designation Renewal System should be a system that can learn and grow, and the thresholds should be revisited every five years and updated based on data collected by the Office of Head Start. Thresholds should not be changed more frequently than five years because each grantee should know from the first day of their five year grant what benchmark they must pass over the course of the grant period.

Single Deficiency Trigger

Head Start programs are also required to compete as a result of one or more deficiencies, instances of being out of compliance with even a single one of the Head Start Program Performance Standards. The discussion among programs focused on how lack of consideration of the severity or frequency of these issues has led to programs competing over single instances of human error, even if they have systems in place that catch and address those events immediately. In cases of severe or repeated problems, competition is appropriate, but intermediary measures should be in place for problems that are not severe, frequent, or systemic.

Recommendation:

Because all grantees will hold a five year grant by the summer of 2016, changes should be tied to the new five year monitoring and oversight cycle. For grantees with deficiencies during monitoring events over the first three years of their grants, the Office of Head Start should establish a national review committee to examine whether those issues are (1) addressed immediately by a program's systems, (2) quickly addressed and not repeated, (3) systemic or non-systemic, and (4) minor to severe. During this process grantees should be able to provide context and insight about the concern. Based on the findings of the review committee, programs should be issued corrective action plans and required to compete if the corrective action is not completed; if the issue is repeated; or if the issue is truly systemic or severe. These changes would allow grantees to focus on building quality through strong systems and continuous improvement rather than living in a constant state of anxiety.

Since the beginning of DRS, the Administration has described it as the "1.0" version. The Head Start community embraces accountability but awaits the same commitment to the continuous quality improvement of DRS that they pursue every day. While we understand the evaluation of DRS will eventually inform a comprehensive review of the system, the two problems described above require immediate solutions. NHSA and the undersigned national, regional, and state Head Start associations welcome further discussion of "Designation Renewal System 2.0" and look



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forward to the Administration taking timely action to further our shared dedication to high quality programs for every child and family in Head Start.

Sincerely,

Yasmina Vinci
Executive Director
National Head Start Association

National Migrant and Seasonal Head Start Association

New England Head Start Association
Region II Head Start Association
Region III Head Start Association
Region IV Head Start Association

Region VII Head Start Association
Region VIII Head Start Association
Region IX Head Start Association
Region X Head Start Association

Alabama Head Start Association
Alaska Head Start Association
Arizona Head Start Association
Arkansas Head Start Association
California Head Start Association
Colorado Head Start Association
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Oklahoma Head Start Association
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Rhode Island Head Start Association
South Carolina Head Start Association
South Dakota Head Start Association
Tennessee Head Start Association
Texas Head Start Association
Utah Head Start Association
Vermont Head Start Association
Virginia Head Start Association
Washington State Association of Head Start and ECEAP
West Virginia Head Start Association
Wisconsin Head Start Association
Wyoming Head Start Association

cc: Deputy Assistant Secretary Linda Smith, Administration for Children and Families
Director Blanca Enriquez, Office of Head Start