



NATIONAL HEAD START ASSOCIATION

August 7, 2014

Office of Management and Budget
Paperwork Reduction Project
Attn: Desk Officer for the Administration for Children and Families

To whom it may concern:

Thank you for providing us with the opportunity to submit our comments regarding the proposed information collection "Head Start Program Information Report" (Federal Register Volume 79, Number 105 (Monday, June 2, 2014) Pages 31339-31340).

The National Head Start Association is a non-partisan, not-for-profit organization that believes that every child, regardless of circumstances at birth, has the ability to succeed in life if given the opportunity that Head Start offers to children and their families. NHSA is the national voice of more than a million children in Head Start and Early Head Start programs in the United States.

The Program Information Report offers an important glimpse each year into the reach and breadth of Head Start and Early Head Start services in communities across the country. NHSA supports this effort to gather national data and encourages the Office of Head Start to collect data in ways that are useful to programs in their continuous improvement. Below we offer suggestions to enhance the quality, utility, and clarity of the information to be collected.

Early Head Start-Child Care Partnerships

The 2015-2016 program year will be the first full year for the implementation of the Early Head Start-Child Care Partnerships that are expected to be funded in the winter of 2014. Given that partnerships have never before been implemented at this scale, it is critical to ask the right questions to measure the early impact of this effort both in terms of the establishment of successful partnerships and families reached. Beyond the questions that have been created to capture the number of children served and partnerships formed, NHSA suggests the inclusion of additional questions:

- Following A.11, include a question about funded enrollment at a child care partner within the respondent's agency. For example, if a Community Action agency operates an Early Head Start program and a child care and the two are partnering under this opportunity, it is unclear that those children should be included in responses to A.10 and A.11 as they are currently framed.
- Following A.12, include questions for each partnership model about the number of children served alongside EHS children who are experiencing Head Start Program

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Performance Standards but who are NOT funded through EHS. (If this is the intent of question A.26, the question is unclear.)

- Add questions (separately about center-based and family child care models) about the demographics of children served with partnership slots. For example, family income, family employment/education status, and subsidy receipt may vary between this model and other models of EHS service delivery.
- Add questions (separately about center-based and family child care models) about the demographics of partnership staff, particularly education, salaries, and turnover. This information may inform our understanding of how impacts vary among different models.
- Add a question about turnover in partnership slots; this is important to gather as it may reflect difficulty with subsidy continuity or increased family stability.
- Add a question about the hours of services provided at partner sites.
- Add a question about the agency type for partnership sites (private/public non-profit, private/public for-profit, campus-based child care, etc.)
- On question C.50, add “assistance with child care subsidy” as a type of service that may increasingly be provided to families.
- On question C.58, differentiate between center-based and family child care partnerships.

Reach and Demographics of Head Start

The narrative of Head Start’s national reach is underscored by data from each year’s Program Information Report. NHSA recommends several questions be added or amended to better inform that narrative:

- Add a question about either all the zip codes or all the Congressional districts served by each program.
- Add additional nuance to question A.19 about family income by asking not only the number of children below 100% of the federal poverty guideline but those below 50% of the FPG.
- Add a question about program waiting lists. Given that these fluctuate at different times of year, we suggest choosing a date (for example, October 1st) and asking programs to give the number of children on their waiting list on that date.
- Add a question under family and community partnerships about the number of children born to teen mothers.

Professional Workforce

The preparation and compensation of the Head Start workforce is an important factor in providing high quality services to children and families. To better understand the make-up of this workforce and how to best support it, NHSA recommends the inclusion of the following questions:

- Add a question to “Staff by Type” about the number of staff members who belong to a union.
- Following the credentialing questions in section B, add a question about the types of institutions enrolled staff are attending (community colleges, private

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colleges/universities, public colleges/universities, etc.) and a question about whether they attend on campus or online.

- In question B.11, ask about the average salary/hourly rate for center-based child care partnership sites as well as family child care providers.
- In the section on “Family & Community Partnerships Staff,” add questions about salaries and average case loads.

It is our hope that you will pursue this collection with the goals of the Head Start community in mind: to improve the early environment and educational opportunities of children in poverty. All data gathered should offer Head Start programs ways to be ever more thoughtful and effective in their work. Thank you again for the opportunity to provide comments; if you have any questions, you can reach me at yvinci@nhsa.org.

Sincerely,

A handwritten signature in cursive script that reads "Yasmine Visci".

Executive Director
National Head Start Association