



February 12, 2015

Linda Smith
Deputy Assistant Secretary for Early Childhood Development
Administration for Children and Families
U.S. Department of Health and Human Services
cfcobasics@acf.hhs.gov

Dear Linda,

Thank you for providing the opportunity to submit comments regarding “Caring for Our Children Basics” (Federal Register Volume 79, Number 243 (Thursday, December 18, 2014) Pages 75557-75564). The National Head Start Association (NHSA) and the Head Start community strongly support ACF’s commitment to ensuring all young children are in healthy and safe environments and also ACF’s efforts to “reduce the conflicts and redundancy found in standards that are used to monitor early care and education settings.” For fifty years, Head Start programs have met strong federal standards and designed healthy environments and safe practices for our nation’s youngest children. As the early learning infrastructure across the country continues to expand, it is essential that basic health and safety standards be met for every child.

Recognizing that “Caring for Our Children Basics” will complement the forthcoming revised Head Start Program Performance Standards, and for the overall effective implementation of these standards for early care and education providers, NHSA and the national, regional, and state Head Start associations listed below offer the following comments and suggestions:

1.2.0.2 – Head Start programs are currently not required to use fingerprints as a component of background checks unless their states require it; additional expenses should be considered before making this mandatory.

2.2.0.1 – The proposed standards call for “developmentally appropriate child-to-staff ratios.” Conflict between state and Head Start definitions of appropriate ratios have already created obstacles for Early Head Start-Child Care Partnerships, and we recommend ACF identify the developmentally appropriate ratios for each age group.

2.2.0.9 – The phrasing of “exclusion of physical activity/outdoor time as punishment” may be confusing and we recommend clarification.

3.2.1.4 – In the delineation of diaper changing procedures, certain steps, i.e. “carry the child to the table” may only apply to younger children.

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3.2.2.1 – While frequent hand washing is good practice, the list here might best be divided into required (diapering, handling food, etc.) and recommended.

3.4.1.1 and 6.5.1.2 – Alcohol and illegal drugs should never be used by staff during paid time or around children, however staff use of tobacco during breaks and prior to driving students is not necessarily enforceable by programs. For these instances, programs often have practical measures in place such as requiring smokers to wash their hands and change clothes.

3.6.3.3 – This standard says any trainer in medication administration should be a “licensed health professional.” In Head Start programs this training may also be provided by a health staff member or medical or nursing assistant, and we suggest this flexibility be allowed.

4.2.0.10 – Posting children’s allergies publicly raises privacy concerns for Head Start programs; other suggestions for communicating this information include posting it in kitchens, notifying teachers, and posting that someone in class has a given allergy with means for staff to identify which child is allergic.

5.2.8.1 – In this standard, adopting an “integrated pest management” should be clarified to reflect that for programs without a history of pests, it would be sufficient to have a policy in place for preventing pests and responding if necessary.

5.5.0.7 – On the list of materials that should not be accessible to children, please clarify if “plastic bags” refers to grocery bags or to all bags, as small Ziploc and similar bags are often used for lunch and toy storage and may be appropriate for older children to handle.

6.3.1.1 – Head Start playgrounds that are owned by or shared with schools may not be able to be “secured against inappropriate use” as they serve as public playgrounds after school hours.

6.5.2.2 – The Child Passenger Safety standards are for “vehicles other than a bus.” We recommend that standards for appropriate busing of young children also be included.

7.2.0.1 – For immunization documentation, programs should have the option to follow either the recommendations named or their state’s EPSDT, as this is often tied to families’ insurance.

9.2.4.8 – Standards should clarify whether parents and guardians “whose identity has been verified by photo identification” refers to a single or daily check of identification.

9.4.2.1 – Standards should note that confidential files should be immediately available either on paper or electronically.

10.4.2.1 – The twice annual inspections should be clearly stated to not duplicate other monitoring visits programs may receive depending on their funding mechanisms.

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NHSA and the Head Start community join the Administration for Children and Families in your commitment to health and safety for young children in care and education settings, and we welcome continued conversation and any questions you may have as “Caring for Our Children Basics” is revised and implemented.

Sincerely,

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

Executive Director
National Head Start Association

National Migrant and Seasonal Head Start Association

New England Head Start Association
Region II Head Start Association
Region V Head Start Association
Region VII Head Start Association
Region IX Head Start Association

Arkansas Head Start Association
California Head Start Association
Connecticut Head Start Association
Illinois Head Start Association
Indiana Head Start Association
Kansas Head Start Association
Maine Head Start Directors Association
Minnesota Head Start Association
Montana Head Start Association
Nebraska Head Start Association
New Jersey Head Start Association
New Mexico Head Start Association
New York Head Start Association
Ohio Head Start Association
Rhode Island Head Start Association
South Carolina State Head Start Association
Tennessee Head Start Association
Virginia Head Start Association
Washington State Association of Head Start and ECEAP
West Virginia Head Start Association

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