



NATIONAL HEAD START ASSOCIATION

August 1, 2013

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 'Evaluation of the Head Start Designation Renewal System' (Federal Register Volume 78, Number 112 (Tuesday, June 11, 2013) Page 35038). This study offers an opportunity to gain valuable information about the effects of recent policy changes.

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.

NHSA strongly supports research that poses questions about how to improve services to the at-risk children served by Early Head Start and Head Start programs across the country. Since the introduction of the Designation Renewal System (DRS), it has been a subject of discussion and debate across the Head Start field. NHSA has numerous concerns about the DRS as currently practiced, and as the second round of grant competitions begins and the DRS moves toward fuller implementation, it is critical to gain insight into whether or not this process is having a significant, positive impact on the services children and families receive. As the Designation Renewal System Evaluation moves forward, NHSA supports its goal of determining "how the system is meeting its goals of transparency, validity, reliability and, ultimately, overall program quality improvement" and offers the following comments to support the utility, quality, and clarity of this study.

It is important to address these questions. The stated purposes of the study are to "(1) examine the validity of the DRS and its sensitivity in differentiating lower performing programs from higher performing programs; and (2) examine the role of the DRS in improving quality in Head Start and Early Head Start." These are important questions to be asking and we hope to see timely, nuanced, and accurate data collection, analysis, and reporting. In particular, findings about whether the study's measures corroborate "low quality" designations in programs that are selected to compete because of single, human-error deficiencies or CLASS scores in the bottom 10% of programs will inform future rules and regulations and efforts to better define, identify, and support quality.

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"Quality" is about more than what can be easily measured. There has been much debate in the Head Start field about whether all of the DRS triggers are truly reflective of quality, or whether any single trigger can speak to the overall quality of a program. The tools used in the first phase of this evaluation will give a comprehensive picture of program features that can be measured, offering a separate verdict on quality - and where the line is between high and low quality on those measures should be carefully considered. Yet for practitioners, "quality" may have still another definition. Qualitative work should aim to capture the meaning of quality to the field; while high quality services are everyone's aim, without a common definition, success can never be achieved.

Both quantitative and qualitative data are needed to address these issues thoroughly. The Designation Renewal System has already had many extensive consequences, affecting morale, partnerships, and public reputation in programs identified to compete and also affecting willingness to innovate and partner across the Head Start system. While quantitative measures will answer some questions about the impact of DRS, qualitative instruments will be equally important for capturing the global implications of this dramatic shift in how Head Start functions at the program, community and national levels. The voices and stories of the Head Start field must be heard and considered in any analysis of how DRS affects the program at large.

The DRS Evaluation should examine both intended and unintended consequences. In addition to possible changes in quality, there are many programs where competition or concern about competition have led programs to avoid forging new partnerships, to decide against participating in research studies, or to otherwise make more conservative choices about innovation. In those programs that have been required to compete, significant funds and energy have been directed toward grant preparation which, in the event that a program was incorrectly labeled "low quality," might better have been put toward serving children. In addition, programs in competition have had to deal with negative press, wary community partners, the loss of valuable and trained staff, and families struggling with a new layer of uncertainty in their lives. Qualitative interviews should be structured to ensure interviews gain a full picture of these and other side effects of the Designation Renewal System.

As much as possible, changes in quality within competed areas should be measured. While all Head Start programs are committed to high quality programming and continuous improvement, it is particularly important that children and families identified as receiving lower quality services before DRS receive high quality services as a result of this process. Aggregated state, regional or national numbers cannot capture local change, and if at all possible the study should measure whether services have improved for particular children and families. Examination of CLASS scores over time may offer one tool for measuring local change in quality, though it should not be used as a sole measure.

Findings should be shared quickly to best inform the future of the Designation Renewal System and Head Start improvement efforts. Findings about whether DRS successfully assesses quality and whether programs actually do or do not significantly improve quality as a result of this new system will have major implications for future policy and legislation. Recommendations for improving quality based on analysis of programs that are considered "high

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quality" are also welcome. Results from this study should be shared with broad audiences in a timely manner.

It is our hope that you will pursue these research endeavors with the goals of Head Start in mind: improving the early environment and educational opportunities of children in poverty. All research should offer the field ways to be ever more thoughtful and effective in their work. We very much look forward to your findings.

Sincerely,

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

Executive Director
National Head Start Association