



NATIONAL HEAD START ASSOCIATION

January 4th, 2016

To whom it may concern:

Thank you for providing the opportunity to submit comments regarding the Draft Policy Statement on Family Engagement "From the Early Years to the Early Grades" prepared by the U.S. Department of Health and Human Services and the U.S. Department of Education. This policy statement has the potential to offer clarity and resources for alignment and continuity of care to people working with young children and their families across the country. In order to achieve that potential, we, the National Head Start Association and the undersigned organizations, offer the following three recommendations.

On background, the National Head Start Association 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. Head Start and Early Head Start represent a national commitment to providing early learning opportunities for the children who are most at-risk – as well as the two-generation services that enable their families to make progress toward stability, self-sufficiency, and long-term engagement with their children's learning.

The first recommendation is to strengthen and expand the purpose and importance of family engagement. As the Policy Statement recognizes, Head Start has a fifty year history of developing and modeling best practices for welcoming families as their children's first teachers and advocates. It is a point of pride for the Head Start community that the description of family engagement as "systematic inclusion of families as partners" reflects their long and closely held values. The Statement identifies its purpose as a focus on "systematically engaging families in their children's development, learning, and wellness." Yet, while important and a good starting place, these are not the only opportunities for successful family engagement as parents bring their children across the thresholds of Head Start centers, preschools, child care facilities, and elementary schools. It is good to see the research about supporting family well-being included in the opening section of the statement and mentioned as work that schools can do through partnerships. However, two-generation components of Head Start such as parental education, job training, financial literacy, and civic engagement most likely contribute to the fact that effects for children are seen through high school graduation rates and other adult outcomes. We recommend that there should be a greater sense of intention about building these practices into school systems and all other early learning models as well.

Second, one important lesson the Head Start field can contribute to this dialogue is about measurement. Mention of data in the Policy Statement mostly relates to outputs for teacher training and preparation, when in fact the effect of family engagement services on changing



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family trajectories is the critical outcome of the whole process. NHSA is currently working with NORC at the University of Chicago to develop a measurement tool for family engagement based on text analysis of narratives from over a thousand Head Start families from randomly selected programs, and we look forward to contributing to the greater early learning community as findings are available. We recommend that the statement strengthen its focus on data in order to expand the need for research around family outcomes.

Finally, state and local action steps are important but action must also be taken at the federal level to protect and promote the role of parents in Head Start itself. The Notice of Proposed Rulemaking for Head Start Standards that was released in July 2015 removes critical standards related to establishing Family Partnership Agreements and Parent Committees. This statement says, "Schools and programs should establish policies that ensure parents and families are prepared to participate in planning, decision-making and oversight groups such as boards, councils, committees, or working groups." This position, which is of the utmost importance, would be undermined in Head Start if the proposed standards become final without changes, and NHSA and the Head Start community strongly urge the Department of Health and Human Services to revisit these sections and recommit to the importance of including families as partners. We further recommend that the Departments of Education and Health and Human Services include this reference to governance in the proposed Policy Statement and that they ensure that all policies and regulations they promulgate, such as the upcoming final rule on Head Start Performance Standards, embody this critical focus on parents' roles within schools and programs.

Head Start has always been rooted in the importance of families in children's early development, and it is exciting to see this Policy Statement and envision its effect on relationships and alignment between early learning providers and schools. 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 "Yamin Visci".

Executive Director
National Head Start Association

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Region III Head Start Association
Region IV Head Start Association
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