



December 21, 2010

Comments from the National Black Child Development Institute re: Head Start Program
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To the Administration for Children and Families, Office of Head Start:

Thank you for inviting comments on the proposed rule amending Head Start Program Regulations to establish a system of designation renewal. The National Black Child Development Institute (NBCDI) is a leading nonprofit organization dedicated to improving and advancing the quality of life for Black children and their families through education and advocacy. We believe that the new rules for Head Start come at a critical time for our children and that we must collectively take advantage of opportunities presented through these rules to support high-quality programming and equitable achievement for all our children – and our youngest, emergent majority learners, in particular.

Approximately one-third of the nearly 1 million low-income students served annually through Head Start are Black / African-American. We know that high quality early childhood experiences are of critical importance to their long term academic achievement and social-emotional development, and we, like the Administration for Children and Families and the Office of Head Start, want to ensure that every child in every Head Start classroom is receiving the kind of positive teacher interactions, stimulating learning environments, and social supports that result in improved child outcomes. The existing black-white student achievement gap that appears as early as school entry and increases over time is unacceptable in moral and practical terms, and we are counting on Head Start to be a continuing part of the solution for Black children, and for all children, across the country.

We strongly support many elements of the recompetition rules, believing they will motivate classrooms and grantees to continuously improve and contribute enormously to strengthening

program quality. We also, however, have a limited number of questions and concerns regarding select aspects of the rules, as currently proposed.

Section 1307.3 (a): 25% Standard Threshold for Recompetition

NBCDI understands and strongly supports the need to identify and require low-performing programs to re compete for another five-year grant; but it is equally important to identify and ensure that high-performing programs are not caught in the recompetition cycle. For this reason, among others, we are struggling with the minimum 25 percent standard, which currently reads as though a subset of grantees could initially be identified as high-performing according to the original seven triggers – but might then fall from the high-quality to the low-quality realm if not enough grantees were initially identified as being low-quality. This seems inconsistent and contrary to ACF’s commitment to ensuring a fair and transparent designation process. NBCDI would like to recommend two potential solutions, depending on ACF’s understanding of the purposes of its seven triggers.

First, if ACF has identified the triggers that it believes represents the baseline for achieving high quality, it seems logical to require any grantee that does not meet those criteria to re compete – regardless of whether that means, for example, 20 or 35 percent of grantees. If ACF is committed to a standard threshold, and too many grantees are identified as being low-performers, ACF could institute a lottery system so as not to re compete too many grantees in a given year. While arbitrary, this would at least be a fair system, and would allow some grantees a reprieve to correct their deficiencies, improve their CLASS scores, and align with the rest of the quality identifiers before the next round of recompetition.

If, however, the triggers instead represent ACF’s designation of the line below which programs are of the lowest quality, then NBCDI recommends clarifying the fact that the recompetition process will be based on a tiered system of quality identification. In other words, there isn’t a simple line between “low-quality” and “high-quality;” programs instead would be identified along a quality spectrum, where the lowest-quality programs would have to re compete first – followed by the next tier of programs who, while not of the lowest-quality, still do not meet ACF’s expectations for being high-performing. This would allow for a more clear and consistent

approach to the recompetition process, and would also require ACF to define and communicate not only the criteria for the lowest-performing grantees, but also for the highest-performing. In defining both the top and the bottom performers, it may also become easier to identify the intermediate quality benchmarks that can be used to determine which grantees will and will not be drawn into recompetition.

Within the context of the 25 percent standard threshold, NBCDI has additional concerns around the need to ensure that certain programs are not over-represented in the grantees that are selected for recompetition. It will be important for ACF to research, track and evaluate the types of grantees who are represented in the bottom quartile to ensure that there are no built-in biases in the way the triggers have been designed. If, for example, urban grantees serving large numbers of black children are primarily identified for recompetition, analyses will need to determine whether that is a legitimate and critical quality issue or whether the triggers over-identified a certain subset of the grantee pool. Along similar lines, we recommend that ACF consider carefully how Early Head Start will be fairly included in the proportion of grantees that are subject to recompetition, given that they will not be utilizing CLASS or a similar measure of environmental and interactive classroom quality. If the recompetition process does yield patterns that indicate built-in biases resulting in over-identification of a subset of grantees, or of children served, we recommend that ACF review its use of the proposed tools and triggers.

Section 1307.3 (b) (3): Quality Conditions – CLASS

Much has been written in early childhood communities about the importance of developmentally appropriate assessments for young children. NBCDI believes that we need to direct increased attention towards children's abilities and outcomes in the early years, and we support the use of the CLASS instrument as part of an overall strategy to achieving high-quality Head Start classrooms. As part of our assessment philosophy, we believe it is important to ensure that assessment for young children, in particular, (a) takes all domains of development into account, including social-emotional domains; (b) relies upon multiple methods and measures, with a focus on observational strategies; (c) ensures that the assessment's primary purpose is to improve instruction; and (d) is culturally and linguistically responsive, in addition to being

developmentally appropriate. NBCDI is particularly concerned that in the context of the recompetition process, grantees must not lose sight of the fact that CLASS is intended not only to measure but also to improve classroom practices. We recommend that ACF continues to work with the creators of CLASS at the University of Virginia to ensure that they and Head Start classrooms are successfully utilizing the instrument and related professional development tools. In addition, it will be critical for ACF to work with UVA to develop a cadre of trained observers who can understand nuances in cultural practice, and adjust CLASS scores to accurately reflect appropriate cultural standards among Black, Latino and Native American communities.

With regard to scoring, in an ideal situation, NBCDI would prefer to have ACF institute an absolute threshold for the CLASS scores, in which any grantee scoring in the instrument's identified "low-quality range" would be subject to recompetition. Given, however, the fact that CLASS's own data suggest that the average instructional support score for programs across the country falls into the "low-quality range," it seems more prudent at this time to allow for a relative comparison of scores. As ACF notes, the comparison could be between a grantee's scores and the national mean scores for each domain; or it could be between all grantees reviewed in the same year. NBCDI recommends a comparison to the national mean scores, controlling for demographic differences that may exist between Head Start and state-funded PreK programs. Children in Head Start deserve to have their program's quality measured against the full range of available programs; it should not be limited to an internal measure of quality.

In order to arrive at the scores, however, ACF also needs to clarify how CLASS will be administered to a "subset of classrooms" for a grantee serving children in multiple classrooms. How will this subset be determined, and how many classrooms will it include? Will the determination of a subset be dependent on the size of the grantee? Guidance in this area is extremely important to ensuring a fair implementation of the CLASS instrument.

Section 1307.3 (b) (4): Licensing and Operations Conditions

In general, NBCDI supports the licensing revocation trigger, but has concerns about its application to large, or super, grantees and the potential disincentives this rule might produce

with regard to encouraging partnerships between, for example, school districts and the early education and care community. We recommend that ACF carefully scrutinize this trigger, and other portions of the rule to ensure that there are no unintended consequences that will affect the ability of grantees to partner with the community for fear that they may be held accountable if a license is revoked at even one center or location.

Section 1307.7 (c): Additional Criteria to Identify Poorly Performing Grantees

This is a highly critical piece of the rulemaking process, and NBCDI encourages ACF and the Head Start community to grapple more with the questions of how to identify increasing quality along the spectrum before moving forward with either set of criteria that have been proposed for identifying additional poorly performing grantees. In the first proposed approach, for example, NBCDI appreciates the effort to use existing data, but we fear that there is a difference between quality and compliance that is masked through the use of this particular data set. Do non-compliance findings truly correlate with increased quality? (If ACF believes that they do, then certainly it will be important to undertake the Herculean task of assigning more weight to those findings that are associated with quality, while minimizing findings that reflect relatively minor non-compliance issues – though this will surely be a fraught and arbitrary process).

The second proposed approach, in which programs would have to be subject to additional evidence-based rating instruments, is also problematic. While each of the instruments identified are excellent tools for determining the quality of the classroom environment, we fear it may be unnecessarily burdensome to ask programs to be assessed with external reviewers using multiple instruments when it might be more straightforward to, for example, continue to use CLASS scores to determine the next tier of poor performers. If, for example, ACF determined that all programs that scored in the low-quality range were automatically subject to recompetition, but it was still necessary to include additional programs to reach a standard threshold, ACF could look at the next layer of programs who received scores that were at the low end of the moderate-quality range. If this yielded too many programs, then a lottery would be an appropriate way to arrive at the standard threshold percentage. ACF might also think about conducting observations on a larger subset of classrooms, for those grantees that serve children in multiple classrooms.

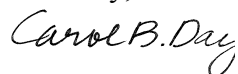
These options, however, may not arrive at a more comprehensive and clear definition of increasing quality. As we have indicated elsewhere, it is important that ACF communicate clearly the elements that define both low-performing and high-performing grantees, while also taking steps to ensure that the high-quality grantees are rewarded and protected from recompetition. This process will also help ACF to identify the intermediate quality benchmarks that can be used to better determine which grantees will be drawn into recompetition.

Section 1307.5: Transitions to a New Grantee

We all hope, as ACF does, that the transition to a new grantee selected as the result of a recompetition “generally will proceed without any disruption of services to children and families in the community served.” Transitions are, however, typically challenging for children and families, as familiar routines are changed and both individual and institutional anxiety levels are high. It is in the children’s best interest for ACF to support grantees and ensure best practices by putting additional rules and guidance into place around the transition process that focuses on relationship-building among teachers, parents, providers and children. Although continuation of services is of primary concern, there are a number of ways in which this rule can contribute to building and strengthening a safe, secure and seamless transition for children and families.

We thank you for your commitment to our children and families and hope this contribution is valuable to you as you work to strengthen Head Start through a recompetition process. Given our knowledge about the critical nature of the early years in ensuring a child’s lifelong success and in preventing the achievement gap from even taking hold, we look forward to working with you to ensure a high quality early education and care experience for all children in all Head Start classrooms moving forward.

Sincerely,



Carol Brunson Day, President & CEO