

National Association for the Education of Young Children

1313 L Street NW, Suite 500, Washington, DC 20005-4101

202-232-8777 800-424-2460

Fax 202-328-1846

www.naeyc.org

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Dr. Blanca Enriquez, Director
Office of Head Start
1250 Maryland Ave SW
Washington, DC 20024

Dear Dr. Enriquez,

Thank you for the opportunity to comment on the Notice of Proposed Rule Making (NPRM) for the Head Start program performance standards. Head Start continues to be the largest early childhood education program in the country, bringing comprehensive services to hundreds of thousands of children and their families each year. During the course of its history, Head Start has evolved as a program, the demographics of the children and families it serves has changed with that of the country, but the focus on providing quality services for the most disadvantaged has remained constant. The National Association for the Education of Young Children (NAEYC) also has a long history of advocating for high quality programs for young children, birth through age 8. We have worked to ensure that research informs our work with programs serving young children, the adults who work with them, and the organizations and programs that train and support these adults. The NPRM reflects the great breadth of research that can be brought to bear on the critical challenge in ensuring that all children have access to high quality early childhood education.

We believe that, if effectively implemented, these proposed Rules will dramatically advance the quality of services provided by the Head Start program for children and families. Effective implementation, however, is a profound challenge to achieving the scope of changes envisioned by the NPRM without significant funding and sufficient time for implementation to occur. In this response, we elaborate on these broad concerns and offer some suggestions. These broad concerns are also reflected in several more specific areas that we would like to raise. While we intend to provide a critical lens on the NPRM, we do so recognizing its ambition, its research foundation, and our shared commitment to ensuring that early childhood programs are of high quality and ready access for young children and their families.

Lessons from Implementation Science

Implementation science is an emerging field of study that examines the process of developing and utilizing research and evidence-based methods and strategies to address real-world problems. It is a critical field in that it provides a framework for studying and understanding how evidence-based change can occur in existing systems, like Head Start. Two critical lessons from implementation science are that (1) implementation requires well-defined activities and goals, (2) achieving the expected goals from proposed processes requires fidelity to those processes, and (3) implementation with fidelity takes time. Many of the points raised by the NPRM reflect the latest research, but translating that research into program quality cannot be achieved with both speed and fidelity, and certainly cannot be achieved without substantial investment in technical support. In other words, planned implementation, or phased change, is often

required to move complex systems, and movement requires a breadth of support to ensure it is done with fidelity to the goal. We urge Head Start to develop a plan for implementation that allows for changes to be phased in over time, with agreed-upon, measurable milestones toward complete implementation. Likewise, we urge Head Start to examine its current capacity to provide sufficient technical and programmatic support to existing programs to make changes to adhere to new standards.

In addition to time and fidelity to implement change, many of the ideas introduced by the NPRM will have substantial costs that must be considered. While it is suggested that the budget request for Head Start can cover the costs of changes introduced by the NPRM, there is always the danger of the NPRM amounting to a set of unfunded mandates for Head Start. If all of the proposed rules are implemented without the associated funding, programs will certainly struggle not only to meet the new rules, but also to maintain their current operations.

We know from implementation science that substantial changes, introduced into large complex systems, are time and resource demanding. *We urge Head Start to identify phased-in benchmarks to ultimately meet the goals described by the NPRM, and to ensure that all funding and technical assistance necessary to meet these benchmarks with fidelity are available to programs.*

Ensure alignment between Head Start Standards and those articulated through the Child Care Development Block Grant (CCDBG) and early childhood initiatives

One substantial change in the NPRM is a restructuring of Head Start standards to create a better organized, in some cases streamlined set of standards. Some of the streamlining occurs through reliance on *Caring for our Children* and aligning regulations more closely with those found in the Child Care Development Block Grant (CCDBG) program. To the extent possible, alignment between these regulations should be ensured and clearly articulated. For instances where they may not align, for whatever reason, the difference(s) should also be clearly articulated, and if feasible, minimized or eliminated. Likewise, many states are developing or expanding their publically funded pre-kindergarten programs, and many are building or refining the quality rating and improvement systems (QRIS). These large and complex systems are not always aligned, creating challenges in managing Head Start programs on the ground. We urge Head Start to develop technical assistance and other mechanisms that can minimize areas of discord among these systems.

Selection process (Sect. 1302.14)

The NPRM proposes to “require programs to prioritize younger children” for entry into Head Start if there if “publicly funded high quality pre-kindergarten spaces are available.” Presumably this rule would allow for great availability of publically funded programs by shifting slots for 4-year-olds from Head Start to the public pre-K program, and then filling those slots with younger children. In the best light, it is an attempt to manage the complex market of early childhood programs and systems currently in play through numerous federal and state funding streams (and policy and procedures). However, while this proposal is of positive intent, it does raise a number of critical questions. That may serve to introduce even great confusion. For example, it is not clear how “high quality” will be defined and assured within pre-k programs, which are generally governed by state-level (or occasionally district-level) policies. In addition, the presence of a pre-k program does not speak to the geographic needs that may remain largely unmet even with a public pre-k program (that is, a public pre-K may meet very little or nearly all of the need for programs among eligible

families/children). The proposal focuses on availability of full-day public pre-k, but does not speak to the availability of less than full-day pre-k, and how existing public pre-k programs may intersect with existing Head Start programs to provide full day programs for eligible children. Finally, it is not clear what “prioritize” means in this context – how would this be defined for programs and enforced is not at all clear. While we recognize the need for a robust early childhood system that can connect different funding and oversight streams, we do not believe that the approach taken in the NPRM will substantially support this goal. Instead of introducing this mandate, we encourage Head Start to work with grantees, public pre-k program systems, and other stakeholders to develop robust systems of systems integration at the local level that can ensure the greatest amount of access to families and children with young children.

Length of day/number of days (Sect. 1302.21)

We commend Head Start for recognizing the deep research demonstrating that greater dosage of effective interventions has the potential for deeper effects in children and families. We recognize that there are two parameters of dosage under purview of the NPRM – number of hours per day and number of days per year – and both are proposed for change. The NPRM notes that the current minimum could lead to a child receiving 448 hours of Head Start in a given year, substantially lower than the 1,048 that would result from the proposed change. According to the Head Start Services Snapshot for 2013-14, 44.9% of slots provided 5 days per week, 6 hours per day and 28.5% were part day, four days a week (lowest total dosage).

This proposed change is both the most exciting, but also most complicated in the NPRM. At current, fewer than half of Head Start slots are available for full-day, full week, meaning that the majority of slots would have to be adjusted in some way (either lengthening the day, adding a day, or both). Such a massive overhaul requires study to understand what the result of change may be in each situation to avoid unintended consequences. With local design options and variation, this single change could lead to a number of unintended, possibly negative outcomes. For example, if slots are funded for part-day using a site which is available for the Head Start program’s use only part day, a change to full day would require securing new space. Finally, programs may operate in a context where adding 2 hours to the program day introduces other requirements, like mandated rest periods or breaks, that would ultimately act to reduce the dosage of educational programming children receive.

In justifying this change, the NPRM notes the research on dosage does not specify an optimal dosage level. The proposed dosage levels tend to align (but not universally) with definitions for full-day, full-year kindergarten or elementary schools, so they are a reasonable set. However, part of why research is not specific about dosage amounts is because the effect is driven by the nature of the experiences children have during their exposure, not simply exposure time. The critical dimension is the quality of the time of exposure. We encourage Head Start to provide the opportunity for programs to develop plans to meet the goal of increased dosage. For programs that are at or close to this goal, implementation may be possible within 1 year; for programs further from this goal, and with complex partnerships and other challenges, meeting the higher dosage goal may require a different form (e.g., fewer, but longer days) or may take longer to be able to implement. We urge Head Start to develop and implement localized needs/feasibility studies to ensure that programs can work towards maximizing dosage while still meeting their local demands and needs.

Teaching and Learning Environment (Sects. 1302.31 and 1302.32).

As a professional association focused on children from birth to 3rd grade, NAEYC is acutely aware of the challenge of providing standards for programs servicing children across that age range. Language that is typically used in references to children of one age cohort may not be used (or may have a different meaning) when applied to children in a different cohort. While infants are engaged in learning from birth, we tend not to refer to them as having “teachers,” receiving “instruction” and following a “curriculum.” As the NPRM moves to reduce unnecessary redundancy in language about optimal learning environments for children in Early Head Start and those in Head Start, we encourage Head Start to be sensitive to some of these differences, and not eliminate them, solely in the interest of streamlined language or requirements.

Background Checks (Sect. 1302.90)

As described, the NPRM complements the background check requirements articulated under CCDBG. This should reduce burden for programs with staff hired and cleared under CCDBG rules. However, the NPRM should move to completely align with the CCDBG provisions, including provisions for due process to potential hires, including completion within 45 days, and that provides for protection against disclosure and clear process for appeals.

Staff qualifications requirements (Sect. 1302.91)

In describing staff qualifications, the NPRM splinters the early childhood profession into differing groups based upon the age of children typically served (as through Early Head Start or Head Start) and role of teaching staff (teacher or assistant teacher). The NPRM reinforces these distinctions by calling for differing levels of qualifications across these groups. We urge Head Start to work towards integrating the findings and recommendations from the recent National Academies Report “*Transforming the Workforce for Children Birth Through Age 8: A Unifying Foundation*” into the qualifications for all professionals working with children served by Early Head Start and Head Start.

Teachers in Early Head Start are expected to hold at minimum the CDA credential, the same expectation for assistant teachers working within Head Start centers. While the specification for Early Head Start training focuses on work with infants and toddlers (appropriately so; the expectation for Head Start teachers is likewise appropriately focused on older preschool-aged children), the differentiation in formal credential and degree requirements splinters what should be a unified early childhood education profession. We encourage Head Start to introduce an increased qualification expectation for Early Head Start teachers comparable to the one introduced previously for Head Start teachers, that within a 3 year period, half of Early Head Start teachers will hold a BA degree in early childhood education or related field.

Meanwhile all teachers in Head Start centers are expected to have an associate or bachelor’s degree, with a total of 50% of all Head Start teachers expected to hold a BA degree in early childhood or closely related field. According to the 2014 Program Information report (PIR) for Head Start, 71% of center-based teachers held a BA or higher in early childhood education or related field. We encourage Head Start to continue this trend by requiring that all Head Start teachers hold a BA or higher degree in early childhood or related field within the next 3 years.

As discussed below (Sect. 1302.92), as Head Start emphasizes the work and role of Coach, there is a need to specify qualifications for this position, as well.

Training and Professional Development (Sect. 1302.92)

We are encouraged that differentiation between center- and home-based is eliminated in describing proposals for research-based training and professional development. As the NPRM correctly asserts, family providers and center-based staff are all early educators (although, see comment on 1302.91 about differing credential requirements) that deserve the same kind of professional support.

Over the past decade there has been a tremendous growth in research on professional development, including a profound movement away from “satisfaction” with training as the desired outcome to affects on teaching practice that support child learning and development. As the NPRM concludes, there is substantial evidence that intensive coaching and mentoring can have a big impact on teaching. This same research, however, has some limitations that are important in moving towards the scale envisioned by the NPRM. First, the large majority of research studies on coaching come from very intensive studies using highly trained coaches – the resulting research demonstrates that this can be effective, but implementing it at scale introduces a range of challenges (noted below). At the same time, there is increasing diversity of the nature of professional learning and development and their delivery systems – the web-based *MyTeachingPartner* as one example of real-time and off-time coaching, webinars for distilling basic information as another. The NPRM indicates that there may be a range of professional development approaches that can be used systematically, but the preference is to intensive coaching. While we agree that the research on coaching is very strong, we also recognize that as adult learners, teachers engage in ongoing learning in a number of ways. Some of these may be more efficient in promoting certain best practices than coaching. For example, many professions employ “on-demand” on-line training and support for specific skills, or employ annual on-line training protocols (e.g., annual ethics training for federal employees). Many of these models can be effective for certain purposes, yet there is no fully recognized source for such information. Federally funded technical assistance programs come closest, and we encourage Head Start to work with these and other services to develop guides for identifying best practices fro professional development based upon population and need. This is not to replace coaching, but to identify less intensive (time and financially) approaches that may be equally or more effective in certain instances.

The requirement that grantees employ coaches and expert mentors as regular staff is encouraging, and certainly allows for a more programmatic approach to how these staff are used. There are a couple of challenges that this raises for implementation. First, there is no specification of the necessary training and skills these coaches or mentors should have – how will programs and grantees identify the best coaches and mentors? The NAEYC brief, *“Strategic Directions: Technical Assistance Professionals in State Early Childhood Professional Development Systems”* provides an important overview to the myriad terms and approaches states take in defining and acknowledging members of the professional development provider groups. The accompanying database (http://www.naeyc.org/public_policy/tap/database/) further describes the variations that currently exists across states in describing qualifications for this group. It would be helpful for Head Start to partner with professional organizations representing the profession and move the early childhood field towards some common understanding of different types of professional development, types of providers, and the necessary skills, knowledge, competencies and qualifications for this group.

Second, the NPRM recognizes that regular and intensive coaching will require a substantial amount of time for which teachers will need support in their classrooms (to the extent that coaching and mentoring occurs

outside the classroom, which is likely to vary based upon the specific areas of focus). However, it is not clear how programs will manage this balance. The NPRM does provide for some flexibility, recognizing the time and financial demands of coaching, to focus on those teachers “who would benefit the most from” such coaching, but it not at all clear what this means. Will programs focus the coaches on newer teachers? Teachers working with more challenging students? Teachers who’ve been observed and rated as most likely to benefit from coaching? The lack of clarity in the rule is sensible, but grantees and programs will need guidance in how to make these decisions.

Finally, we are encouraged that Head Start is building flexibility into the acceptable approaches if that flexibility occurs in the context of research and evaluation to show effectiveness. As written, however, the design and evaluation of these options falls to the individual grantee. While it is certainly true that flexibility requires accommodating local needs, implementing an innovative approach and evaluating it may be a challenge for individual grantees. At the least doing so is time and financially intensive for grantees, which may be undertaking similar innovations and similar (or disparate) evaluations independently. At its worse, these may result in small scale evaluation studies that may be poorly executed and if limited in scale, hampered methodologically to show significant effects. We encourage Head Start, to the extent feasible, to coordinate these efforts across grantees, and if necessary offer technical assistance in implementation and design, so that locally-developed options can be most effectively evaluated.

Thank you for all the work that has gone into this dramatic updating of Head Start program standards. We believe that collectively they reflect best research and practical knowledge in the field of early care and education. We thank you for considering our recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rhian Evans Allvin', written in a cursive style.

Rhian Evans Allvin
Executive Director