

PRRAC

Poverty & Race Research Action Council

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August 18, 2015

Colleen Rathgeb
Director of Policy and Planning
Office of Head Start
Department of Health and Human Services
1250 Maryland Avenue, SW
Washington, DC 20024

Re: Proposed Head Start Performance Standards

Dear Ms. Rathgeb,

We are writing to comment on the proposed revisions to the “Head Start Performance Standards,” set out at 80 Fed. Reg. 35430 (June 19, 2015). Specifically, we will offer suggestions to strengthen the proposed standards’ new focus on socioeconomic diversity in Head Start programs.

Head Start was originally envisioned as an ambitious tool to serve children living in poverty while also promoting socioeconomic integration.¹ The Coalition commends the Department for affirming this vision through its commitment to “better support the ability of programs to serve children from diverse economic backgrounds,” which is important “given research that suggests children’s early learning is positively influenced by interactions with diverse peers.”² Children who are clustered into high-poverty and racially isolated preschool classrooms develop fewer cognitive skills on average than children who may also be low income and minority, but attend more diverse classrooms.³ In geographic areas where increased diversity is feasible, it is important that the Head Start preschool program begin to move away from its current emphasis on all-poverty classrooms⁴ – without lessening the number of Head Start eligible children served.

¹ Head Start founder and developmental psychologist Edward Zigler envisioned Head Start as a socioeconomically integrated program: “I tried to address the issue of socioeconomic segregation in Head Start. By law, the program was limited to serving children and families living below the poverty level. I always thought this was wrong...Democracy is about equality, which is not consistent with tracking children by race or wealth.” Edward Ziegler & Sally Styfco, *The Hidden History of Head Start*, 126 (2010).

² 80 Fed. Reg. 35430, 35460.

³ See Jeanne Reid and Sharon Kagan, *A Better Start: Why Classroom Diversity Matters in Early Education*, The Century Foundation and Poverty & Race Research Action Council (April 2015), pp. 4, 9.

⁴ In 2013-14, only 4.1 percent of Head Start children nationwide lived in households with family incomes that were 100-130 percent of the poverty line. Additionally, only 1.9 percent of Head Start children lived in households earning more than 130 percent of the poverty line, notwithstanding federal laws allowing programs to enroll up to 10 percent of its children from families who have incomes above the poverty line. See Office of Head Start, National Center on Fiscal and Program Management, *What Head Start Leaders Need to Know Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)* (Oct. 2014), available at <https://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/navigating/system9.html>; Child Trends

The Department's important commitment to diversity is reflected in performance measures to support socioeconomic diversity set out in Part 1302, Subpart A, under the *Determining Community Strengths and Needs*⁵, *Enrollment*⁶, and *Fees*⁷ sections. These measures encourage economic diversity and “clarify that programs can charge a fee or a co-payment from families who are not part of the Head Start funded enrollment.”⁸ As discussed in more detail below, we believe that the proposed performance standards can be further strengthened to leverage the benefits of diversity.

Racial/Ethnic Diversity: We recommend the inclusion of explicit racial/ethnic diversity provisions within the proposed performance standards, especially in light of the official federal guidance on this issue,⁹ and research underscoring the widely embraced conclusion that early childhood learning is positively influenced by interactions with economically *and* racially diverse peers.¹⁰ The Head Start program is racially diverse overall, with approximately 25% white enrollment, 33% African American enrollment, and 38% Latino enrollment.¹¹ However, this program-wide diversity is not generally reflected in individual Head Start classrooms. It is essential that the Department keep the closely related concepts of socioeconomic and racial/ethnic diversity linked in the final performance standards¹² in order to further this Administration's “effort to ensure all children have access to high quality early learning opportunities.”¹³

Enrolling a meaningful number of higher income students: The benefits of socioeconomic diversity will not be achieved by enrolling a token number of higher

Databank, *Head Start, Indicators on Children and Youth* (Mar. 2015), available at: http://www.childtrends.org/wp-content/uploads/2014/02/97_appendix1.pdf.

⁵ 80 Fed. Reg. 35430, 35528 (“A program must consider whether the characteristics of the community allow it to operate classrooms that include children from diverse economic backgrounds, in addition to the program's eligible funded enrollment”).

⁶ 80 Fed. Reg. 35439, 35531 (“A program should consider whether it is feasible to enroll children from diverse economic backgrounds who would be funded from other sources that include private pay, in addition to the program's eligible funded enrollment”).

⁷ 80 Fed. Reg. 35430, 35531 (“In order to support programs serving children from diverse economic backgrounds or using multiple funding sources, including private pay, a program may charge a fee to families who are not part of the Head Start funded enrollment”).

⁸ 80 Fed. Reg. 35430, 35463.

⁹ See U.S. Dep't of Justice & U.S. Dep't of Educ., *Guidance on the Voluntary Use of Race to Achieve Diversity and Avoid Racial Isolation in Elementary and Secondary Schools* (Dec. 2011), available at <http://www2.ed.gov/about/offices/list/ocr/docs/guidance-ese-201111.pdf>; see also *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 782 (2007) (Kennedy, J., concurring).

¹⁰ See Roslyn Mickelson, *School Integration and K-12 Educational Outcomes: A Quick Synthesis of Social Science Evidence*, National Coalition on School Diversity Research Brief No. 5 (Mar. 2015), available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo5.pdf>; see also Jeanne Reid & Sharon Kagan, *A Better Start: Why Classroom Diversity Matters in Early Education*, The Century Foundation and Poverty & Race Research Action Council, 4, 9 (April 2015).

¹¹ Child Trends Databank, *Head Start, Indicators on Children and Youth* (Mar. 2015), available at: <http://www.childtrends.org/?indicators=head-start>

¹² For example, on page 35528, first column, §1302.11 (b)(3) (Community Assessment) could be rewritten as follows: “A program must consider whether the characteristics of the community allow it to operate classrooms that include children from diverse economic and racial/ethnic backgrounds, in addition to the program's eligible funded enrollment. On page 35531, third column, §1302.18 (b)(2) could be amended to say “In order to support programs serving children from diverse and racial/ethnic backgrounds or using multiple funding sources, including private pay, a program may economic charge a fee to families who are not part of the Head Start funded enrollment.

¹³ 80 Fed. Reg. 35430, 35430.

income children, and it is unlikely that Head Start preschool programs will be successful in recruiting middle class children to centers that are entirely populated by very poor children. We urge the Department to adopt performance standards that require prospective grantees to make efforts to meaningfully diversify their preschool centers with a critical mass of higher income children¹⁴ – a goal which would need to be accomplished without reducing the number of Head Start eligible children served.¹⁵ We recommend revising §1302.15 (d) to read as follows: “A program must consider how to enroll a substantial percentage of children from middle class backgrounds who would be funded from other sources that include both private pay and blended funding arrangements with other early childhood programs such as state-funded pre-K, in addition to the program’s eligible funded enrollment.”¹⁶

Increased Dosage Minimums: We commend the Department’s effort to improve the so-called “dosage minimums” by increasing minimum hours and days of operation for most Head Start programs and providing Head Start preschool children with additional time for growth and development in school readiness skills. The increased program hours not only provide low-income children with higher quality programs, but they are consistent with the higher “dosage” levels in many State pre-K programs.¹⁷ As a result, these increased minimum requirements would allow for easier integration and merged funding of Head Start with State pre-K programs run by school districts. Diversity outcomes for Head Start students could be dramatically improved through these blended enrollment models.

Additional Recommendations

Consistent with our recommendations above, there are additional steps the Department can take to promote Head Start preschool classroom diversity that may be outside the specific parameters of the proposed performance standards. For example:

Encourage districts to implement blended funding streams to eliminate stigmatizing distinctions between Head Start and other public preschool programs. Mixed delivery systems have been successful in districts across the country¹⁸ and the waiver process for

¹⁴ We recommend a minimum of 30% middle income children to begin to achieve the beneficial educational effects of integration. See Richard D. Kahlenberg and Halley Potter, *A Smarter Charter: Finding What Works for Charter Schools and Public Education* (Teacher's College Press, 2014), pp. 120-122.

¹⁵ In the District of Columbia, the DC Public Schools (DCPS) adopted a Head Start School-wide Model (HSSWM), which combines the best elements of two program models serving children ages 3-4 (Head Start and Pre-K) and blends funding sources (federal and local) to implement a coherent system of high-quality services and supports for early childhood students. This blended funding mechanism allowed DC to serve the highest percentage of children at ages 3 and 4 when compared to other states. See W. Steven Barnett et al., National Institute for Early Education Research, *The state of preschool 2014: State preschool yearbook*, 9 (2015), available at http://nieer.org/sites/nieer/files/Yearbook2014_full2_0.pdf; see also District of Columbia Public Schools, *Early Childhood Education Budget Development* (2011), available at <http://www.dcpsschoolbudgetguide.com/ece.html>.

¹⁶ On page 35531, first column, §1302.15 (d).

¹⁷ 80 Fed. Reg. 35430, 35431 (“Our proposal is consistent with the higher dosage levels in many State pre-kindergarten programs that have shown strong effects, and it is supported by a strong body of research that demonstrates adequate exposure to learning opportunities is important for children at-risk for academic difficulties to make necessary gains.”)

¹⁸ Children in the blended Head Start classrooms in Washington, D.C., “now have access to family support services, nutritious meals in the classroom, oral health and mental health services that research has shown

these blended funding streams should be streamlined to better achieve the goals set out in the proposed performance standards.¹⁹

Increase state and local collaboration to integrate Head Start with state pre-K programs. The Department of Education and the Department of Health and Human Services have made great progress in collaboration, particular in the Preschool Development/Expansion Grants program and in the Race to the Top-Early Learning Challenge grants program. This collaboration needs to be expanded at the local level through blended funding and other approaches,²⁰ to ensure that the Department attains meaningful diversity goals for the program.

Explore “two-way” Head Start school integration programs: In addition to encouraging Head Start preschool programs to enroll children from diverse economic backgrounds through private pay and blended funding, a mechanism should be developed to permit high-quality private and public preschool programs to achieve alternative certification and enroll small numbers of Head Start students, particularly where these programs are in reasonably close geographic proximity to encourage strong parental involvement. We recommend that the Office of Head Start explore whether alternative and comparable performance standards can be developed to make such transfers financially and programmatically feasible.

Fund transportation for Head Start families who choose a program that is not within walking distance. Providing or subsidizing transportation for Head Start enrollees through vouchers, subsidies, or direct provision will assure that families have access to diverse preschool options despite the prevalence of residential segregation.²¹

We recognize that some of these suggestions may not be fully consistent with the current vision of the Head Start preschool classroom as a separate, targeted intervention for low income children. Head Start has been highly successful in delivering comprehensive services and benefits to low income children, in maintaining a high level of quality control, and in reaching low income children of color in Migrant and American Indian communities. Our suggestions may not be feasible in every community, but we believe that it should be possible, in many parts of the country, to adapt the Head Start model to promote meaningful socioeconomic and racial integration without reducing quality and without reducing the number of Head Start Eligible children served. We would be happy

to help our youngest and most vulnerable students make a successful transition to school.” Testimony of HyeSook Chung, Executive Director DC Action for Children, at the Budget Hearing for the District of Columbia Public Schools before the Committee of the Whole Council Of the District of Columbia (Mar. 28, 2012), *available at* <https://www.dcactionforchildren.org/sites/default/files/DCPSBudget.pdf>.

¹⁹ See W. Steven Barnett & Jason T. Hustedt, National Institute for Early Education Research, *Improving Public Financing for Early Learning Programs*, Issue 23 (April 2011), *available at* <http://nieer.org/resources/policybriefs/24.pdf>.

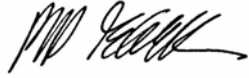
²⁰ Head Start and pre-K collaborations expand access to more children, streamline enrollment, and allow communities to improve quality across early childhood offerings. States have adopted a variety of collaboration models, but all classrooms receiving Head Start funds are subjected to Head Start monitoring and guidelines to ensure quality. For case studies of collaboration between Head Start and pre-K, see Emmalie Dropkin, *Partners For Success: Case Studies of Collaboration Between Head Start and Pre-K*, National Head Start Association (NHSA) Policy Report (July 2013), *available at* http://www.nhsa.org/files/resources/partners_for_success.pdf.

²¹ See Reid and Kagan *supra* note 3 at p. 21.

to discuss some of the challenges to implementing our suggestions and work together to think about how a pilot program could be effectuated.

Once again, we commend the Department for its encouragement of economic diversity in Head Start programs, and we hope that you will consider our proposals to strengthen and expand this commitment in the final performance standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Tegeler", with a long horizontal flourish extending to the right.

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