



March 6, 2007

To: Congressman George Miller, Chair  
Congressman Howard McKeon, Senior Republican Member  
Workforce & Education Committee, 110<sup>th</sup> Congress

From: Lucía Palacios, President, Wassy Tesfa, Vice President – Public  
Policy, & Edward Condon, Executive Director  
California Head Start Association

Re: Comments on Draft House Legislation

On behalf of the Board of Directors of the California Head Start Association, we would like to begin by thanking you for your continuous support of the Head Start program. Many parents, children and staff have benefited from your unfaltering support.

We are pleased to see Head Start's reauthorization legislation moving forward in a positive and bi-partisan manner. We appreciate the opportunity to comment on this draft legislation and look forward to ongoing opportunities to advise you and your staff as to the needs of our children, families and programs.

After a review of the complete Discussion Draft of the Head Start reauthorization legislation, we would first like to express our appreciation for elements of the legislation, which we believe to be very positive. We support the legislation's efforts in:

- Suspending and terminating the National Reporting System
- Clarifying and expanding the definition of "deficiency"
- Changing the federal monitoring to include strengths and areas of improvement
- Increasing the quality improvement set-aside to 60 percent, so as to allow programs to develop and finance salary scales and benefit standards
- Establishing clear policy on the redistribution of un-earned funds within a State

- Returning the role of parents on the Policy Council to their rightful place with shared governance
- Directing State Collaboration Offices to offer specific support to local Head Start agencies.
- Articulating a clear statement on teacher and staff education standards, including the national standard of 50% of Head Start teachers holding a BA by 2013.
- Allowing for T/TA systems to conduct trainings identified as needed by grantee and delegate organizations
- Expanding services to infant and toddlers through Early Head Start set-aside and conversion language

Upon further review, we would like to express our concerns and offer comment in areas that need more attention or further clarification:

- Eligibility – We urge you to consider elevating the eligibility guidelines to 130 percent above poverty, as your colleagues in the Senate have done; this action will allow Head Start programs across the country to serve more children of the working poor. In particular, California has a number of high-cost communities with significant poverty – yet the standard of federal poverty is exceeded by working 30 hours a week at the state's minimum wage. In San Francisco, a parent cannot not work more than 28 hours per week and stay below the federal poverty level. Increasing the eligibility to 130% is equal to a wage of \$8.25 p/h! (Family of 2)
- Enrollment – The proposed bill keeps the 100 percent of enrollment, as opposed to the 95 percent threshold outlined in the Senate bill and advocated for by the Head Start community. Head Start programs must be held accountable, but the standard of 100% is an unreasonable burden and distraction when coupled with the emerging state pre-k systems and economics of a community. A 5% variance in enrollment is reasonable and manageable in communities with high transient rates and general resistance to services.
- Application for Grants & the Review System – While we appreciate your efforts to look at various factors in determining the status of a Head Start agency and whether or not to re-compete, we urge you to consider including only those factors or items that have a direct correlation to a program's ability to provide quality services and demonstrate financial viability (e.g., program reviews and annual financial audits). Including items such as the Program Information Report and a program's self-assessment may change the nature of these tools, as they have no reliable or valid thresholds. In the event this element of the legislation is to go forward, it is critical to direct the Expert Panel in the development of independent quality measurement instruments. Self Assessments are utilized for internal systems development and can be an effective management tool. If this

becomes an element of consideration, it's current internal value will be lost. In addition, Program Information Report data, like monthly budget reports are tools to "direct" operations. Head Start Managers, Directors and Governing Board members need independent internal systems for program development.

- Teacher Requirements – While we support the language mandating that 50% of all Head Start teachers have a baccalaureate by 2013 the mandate is un-funded, which creates a number of difficulties for programs. This includes, but not limited to the cost of support staff to obtain higher degrees. Cost may included some or all of the fees related to tuition, books, materials, release time, travel burden and impact on family. It is estimated by the California State University, Sacramento a student with 70 units (at or close to an associates degree) would still need to complete 50 upper division courses to obtain the baccalaureate. The cost per student would be \$15,200. In California over 1000 staff would need to upgrade or be at risk of being fired. The cost would exceed \$15 million. In addition, and most importantly, significant pressure would come to rest on programs to close the wage gap between K-12 and Head Start. The current gap is slightly more than \$5000 annually. This would result in an additional \$5 million cost in California alone.
- Local Collaborations with State Pre-K – Head Start programs have a long commitment of collaborating with other child care agencies, local education agencies, and State-funded preschool programs; however, mandating that these collaborations occur can be detrimental. Please consider adding language that allows Head Start agencies to demonstrate attempts at formal collaborations, and when collaboration is not possible that it not negatively impact a Head Start program. In addition, it is important that this task be clearly stated in the legislative assignments of the State Collaboration Office and Training and Technical Assistance projects.
- Early Learning Councils: As expressed in our comments regarding the Senate Head Start legislation, we oppose the inclusion of the Early Learning Councils as an element of Head Start reauthorization bills. It is appropriate and valid to seek state level coordination of federal investments in early childhood education and child care programs. However, it is inappropriate to burden already limited Head Start appropriations for the task of "seeding" Early Learning Councils. We believe this language would be best attached to the Child Care Block Grant and funded as part of the established quality set-aside provisions. In this legislation, we would encourage the bill to require a seat for State Head Start Collaboration staff and the State Head Start Associations. State Child Care Administrators would be best positioned along with Governors to move forward in a coordinating manner.

- *Head Start Standards, Outcomes, Measures & Alignment with State Early Learning Standards*: The legislation provides extensive direction to the Secretary on the “establishment of standards” however, does not direct the Secretary to review the status of state early learning standards that have emerged since 1998. We believe this places local programs at a disadvantage and answering to “two masters” when utilizing joint funding or creating alignment to K-12 Education. We strongly encourage the Secretary to include in the review and development of new Head Start Standards, Outcome & Measures with a clear articulation of state models and strategies that avoids the potential conflict or contradiction. Accomplishing a fluency between Head Start, state early learning systems and K-12 Education not only benefits transition services to children, but also supports full day/full year collaboration with state funding, advancing staff development in curriculum and assessment by establishing shared approaches, provides comparable data of target populations and measured outcomes or gains of children and families.

Again, we thank you for the opportunity to comment on this draft Head Start Reauthorization bill. As always, the California Head Start Association stands ready to provide you and your staff with any further assistance needed.