



# CALIFORNIA HEAD START ASSOCIATION

March 14, 2016

CA Department of Finance, Education Systems Unit  
Attn: Early Education Block Grant  
915 L Street  
Sacramento, CA 95814

RE: Proposed Early Education Block Grant

Dear California Department of Finance,

We are writing to provide our comments on the Governor's Proposed Early Education Block Grant. We appreciate the Department of Finance creating a forum for stakeholders to provide analysis and feedback. Head Start is funded from the federal government directly to local programs based on identified community needs with a focus on the lowest income children/families. Because Head Start programs enroll low-income and at-risk children, they need to coordinate effectively with other programs to ensure that children and families' needs are met as effectively as possible.

## **PREFACE: OUR CONCERNS**

The California Head Start Association is very concerned about the likely impact of a block grant and the child development system in California:

- The experience of LEAs' willingness to partner with community based providers has been mixed.
- The potential disruption to blended and braided Head Start programs could have a highly negative impact on the children and families we serve.
- This could easily reduce the total hours of care to children.

Community based organizations build their services around family needs in the communities where the lowest income families live, whereas many schools are limited to set school hours and not always in the neighborhoods of where the families live. Based on our experience, we are not confident that funds flowing through LEAs would be administered with the same sensitivity to family needs.

CHSA would oppose any block granting plan that did not ensure quality and robust participation from community based providers. We appreciate the Department of Finance soliciting input and we are committed to the conversation. To that end, we are offering the following input to the DOF's stakeholder questions:

### **WHICH CHILDREN SHOULD HAVE PRIORITY FOR SERVICE UNDER A BLOCK GRANT?**

Research demonstrates that early education provides the greatest gains for children from low income and at-risk backgrounds. Yet as we know, Transitional Kindergarten eligibility is based on an arbitrary birth window rather than actual need.

A more rational priority for service would be financial need rather than current TK birthdates. The financial need could be set as a percentage of the State Median Income. This qualification, however, should not preclude providers from serving other children on a market rate basis. We know that mixed income classrooms foster an optimal environment.

Additionally, "at-risk" needs to include factors such as disabilities, homelessness, foster children, English language learners, incarcerated parents and parents in treatment for substance abuse, or families identified as "in danger" by the child welfare system.

### **WHAT MINIMUM STANDARDS SHOULD THE STATE REQUIRE OF PRE-KINDERGARTEN PROGRAMS?**

California child care operates with multiple standards that can be confusing and inconsistent. Merely meeting CA Title 22 requirements is not sufficient and does not ensure children a quality developmental experience. At minimum, all programs should be governed by CA Title 5, but with incentives to meet Level 4 of the QRIS standards in a given locale.

The minimum day length could be as short as 3.5 hours if families only need that much child care. However, funding should enable full day programs for working families. The minimum number of days per year should be 180, to ensure meeting the same requirement as the local education agency.

LEAs also need to build a capacity for serving younger children with special needs. Since the advent of Transitional Kindergarten, CHSA has observed a number of school districts disenrolling children after the start of the school year, because they have behavioral or other special needs that the school is not willing or prepared to address. Schools routinely send these children to the local Head Start program. This is terribly disruptive to a child with special needs and their family. If LEAs want to serve four year olds, they need to demonstrate a capacity to serve all of the four year olds that they enroll in a way that is developmentally appropriate and can demonstrate improving children's outcomes as a result of participation.

**HOW CAN LEA'S UTILIZE PRIVATE PROVIDERS TO HELP SUPPORT THEIR PRE-K PROGRAMS? SHOULD PRIVATE PROVIDERS HAVE A ROLE IN THE BLOCK GRANT?**

LEAs have a mixed track record working with community based providers. For example, we routinely hear stories of local Head Start programs being rebuffed by LEAs when they reach out to develop MOUs to outline ways to collaborate around enrollment practices and transition practices. Some LEAs collaborate well with private providers transitioning children into special education, TK and kindergarten.

Private providers often provide a better return on investment than LEAs, because they often have lower costs for a competitive level of quality. Additionally, private providers are critical to reaching the diversity of children and families, to being physically present throughout a region, and to maintaining the capacity needed to address community needs. The stated intent of any block grant should be to not disrupt existing services and programs. This could be accomplished by holding harmless existing providers and maintaining the current proportion of funding between LEAs and private providers, so that any increase or decrease in funding not be to the detriment of private providers. Community based provider funding should increase at the same proportion of any funding to LEA programs. Any quality standard should be applied equally to LEAs and private providers.

Physical capacity is also a critical issue. LEAs often don't have the physical capacity/facilities to serve all of these children.

**HOW SHOULD FUTURE FUNDING AUGMENTATIONS TO THE BLOCK GRANT BE DISTRIBUTED AMONG LEAS?**

We agree that any distribution should be based on need, and so the Local Control Funding Formula makes sense as a ratio for dividing the funds.

We are concerned, however, that LEA administrators often lack knowledge or experience or a stated priority for/with ECE. Whoever holds responsibility for administering ECE funds on the local level needs to have expertise in early education. Additionally, it might be more effective to disseminate block grant funding on the county level through a Child Care Local Planning Council or a County Office of Education, as a way of equitably distributing early education funding. This county level distribution would ensure a high level of expertise and more equitable system for disseminating funding.

**HOW SHOULD THE STATE ENSURE THAT BLOCK GRANT FUNDING IS SUPPORTING POSITIVE CHILD OUTCOMES?**

The State of California has invested many millions of dollars building a system of quality to ensure positive child outcomes. This includes the Learning Foundations and Curriculum Framework, the Desired Results Developmental Profile, the Quality Rating Improvement System, and investments in training and practice based coaching. All programs should be subject to these quality standards, ongoing resources must continue to be earmarked for quality improvement, and programs need to be rewarded for achieving higher levels of quality (such as tiers 4 or 5 of the QRIS). Ensuring a decent level of quality also requires adequate funding, and so program at the QRIS tiers 4 and 5 require a higher level of funding than programs at lower levels of quality.

We would be happy to elaborate on any of these issue areas, and we appreciate your full consideration.

Sincerely,

A handwritten signature in black ink that reads "Rick Mockler". The signature is written in a cursive, flowing style.

Rick Mockler  
Executive Director