

The New Head Start Program Performance Standards

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Ann Linehan: I would like to welcome the Head Start community to join us on this exciting day. Today we have issued the first revision of the Head Start standards in 20 years. And with me today to kick off this momentous day is Dr. Enriquez, director of the Office of Head Start, and Colleen Rathgeb, our policy director. So, right away, I'm going to turn to Dr. Enriquez. Help us. What did we do today?

Dr. Blanca Enriquez: Well, Ann, I think that today is a very exciting day, and people should be excited. But people should also remain very calm. The performance standards reflect many of the comments that we received, continue to describe comprehensive services, and are very streamlined to improve clarity and utility for all programs. And of course, people need to read and understand the regulations. And there are many ways of doing this. They can read from cover to cover, or they can read a section of the preamble and the corresponding section of the regulation. They can read the regulation first and then find the preamble. Whichever way they want to do it, we know, we realize that it's going to take time for people to internalize the performance standards. But we also want to let people know that we will be providing resources for them and walking them through the standards.

Ann: And so, Dr. Enriquez, what should they do with that book -- that old standards book -- now?

Dr. Enriquez: Well, they need to do away with it and immerse themselves in the new standards.

Ann: Thank you. Colleen, could you summarize the approach that we took to this massive revision?

Colleen Rathgeb: Yes. So, the new Program Performance Standards really lay out a full research base -- all the program services requirements based on what we know about the best research, really building on the last two decades' research around how young children learn. So really improving the educational standards while, at the same time, keeping the family engagement, health, comprehensive services approach that we're really building on. So, while we may be saying it's time to let those go and move to the new, we really think it's building from a place of strength there. We hope that they're better written, to clearly make it clear to programs that are running Head Start right now and to people that maybe consider running Head Start, that it's clear what they need to do. They also really are around using data to have programs go through a continuous quality-improvement process using the data that they have about the children and families in the communities that they're in, that we're moving away from a process approach and to try to make it more about outcomes.

So, while there are still quite a few standards there, we are really streamlining and trying to get them less about the process and more about the outcomes, to reduce administrative burden, to focus on what's important the most, and really build on that comprehensive-services approach that we have always had at Head Start and that we really maintain in this final rule, around parent engagement, enrolling the highest need, and children really valuing diversity, and that full approach to the whole-child approach of the whole family and community approach. So we really hope this is building on everything that's great and taking us one step further.

Ann: You sort of said the magic word -- "reduce" administrative burden. Could you speak a little bit to what that reduction means?

Colleen: Yes. So, we really are trying to talk less about the how -- and I think that Dr. Enriquez will talk a little bit more about this -- less about the how and more about the what. And so, also, if there's a government-wide procedure already in place, like in the fiscal and administrative, really trying to stream those down so that, if you're a program and you have to use one audit procedure for all of your other federal grants, we don't want to set something else separate for Head Start. I think there is times that we feel like everything has to be a Head Start special, specific requirement. And I think it's absolutely true, in a lot of the service requirements, that we still say we're serving the most vulnerable children in the nation, we're doing it in the most comprehensive way, so we do need to have special requirements around those services.

But there's other places that we can rely on something else that's already existing and to try to make things a little bit easier for programs, as far as meeting those administrative requirements, or we'll talk about health and safety requirements or other things as we go forward.

Ann: So, Dr. Enriquez, as part of the approach, the themes of flexibility and use of data sort of seem prominent throughout. Could you address that briefly?

Dr. Enriquez: Yes, the new performance standards really emphasize local flexibility and both child outcomes and family outcomes. And what the regulations talk about, they say we tell programs what to do to provide high-quality services but not how to do it, as Colleen just mentioned. However, the use of their data, the use of their community assessment -- where they find their needs, their strengths, and their resources -- should be used very carefully in order to look at their program and adjust their program, determine their outcomes for children and families, then create their approach, their design that is going to get them those outcomes. -And I think I'd just like to comment that use of data that you speak to is so important for the program, but that use of data for the governing body, the Policy Council in making decisions is also critical.

Ann: Absolutely. So, I want to turn to Colleen, because you really kind of wrecked it for me.

[Chuckles]

Colleen: I've been a Head Start director, and I think Dr. Enriquez and I, between us, probably have 60 years of Head Start experience. And the old standards, I knew every citation down to the triple "I," little "c," "d," "e."

Ann: Tell us a little bit about the structure and the format of the standards.

Colleen: So, I think one of the best things, but also one of the challenging things, is that this is a wholesale revision. So 1301 to 1311, that have been in place for many, many years, literally are replaced with this new set of standards. And they begin, still, in 1301 and go through 1305, but you have to erase what you knew about any of those numbers. So, the first section is on program governance. So, 1301 now is all program governance, and that's the full 1301 section. 1302 is really the heart of the regulations, so 1302 is program operation.

So it goes from everything to who is eligible, what do you need to do to enroll, select, and make sure those children are attending, through what are the services -- what are the education services, the family-engagement services, the health services, the services for children with disabilities and for pregnant women, what are all the services provisions, what do programs have to do to support their staff, to be able to provide those services, so all of the H.R. components, and then the final section in 1302 is program management. So, Dr. Enriquez was talking about the use of data. It's really about how programs are using data to set goals, to track those goals, to do their ongoing monitoring and self-assessment, and then to use that data for continuous quality improvement. So, 1302 is really about providing high-quality, comprehensive early-childhood services to children and families.

And then we go into 1303. That's a little drier. It's a little bit the administrative and financial requirements. So, what are the pieces that, because you're getting federal money or you're getting federal money to build a facility or to provide transportation, what do you know -- We're going to talk a little bit later about data, data privacy. So, 1303 is much more the administrative and financial requirements. And then the last section -- substantive section -- is 1304. It's about the federal administrative procedures. So that's really the requirements on all of us.

So, how do you monitor? That is where we talk about the Designation Renewal System -- unchanged but in there -- and, again, the requirements on the Office of Head Start to be transparent about the way we'll operate. And then the last section, now 1305, are all of the definitions. The prior standards had definitions weaved throughout. We have all the definitions in the last 1305. So I know it'll take people a while to get rid of 1304.52 from your brains and to get these new, but we hope that it will be easier for people to approach the standards and understand in the way we've laid these out in this new structure.

Ann: So, as you describe that, certainly, 1301, governance, is kind of unchanged, because we're relying on the statute. But it's the 1302 that really is, to me, I think -- Dr. Enriquez, if we were giving guidance to programs for their management staff, this has everything to do with children and families for creating quality environments. And I think it's really important. And when I think about, you started off, we had 11 sections and now we're down to four, but, in fact, that fourth section is really our responsibility. So that's something that grantees, while they may want to know what we have to do, it's really our responsibility. So it feels like less. Dr. Enriquez, what about these regulations? Did every regulation change?

Dr. Enriquez: Hmm. Well, Ann, I will answer that by saying, "Yes and no." The entire body of regulations is organized differently, as Colleen just explained, and we have a new numbering system. Now, some of the requirements remained unchanged. Some have minor revisions. Some are significantly different. Others have been deleted. And some are completely new. Again, I'm going to emphasize, throw out your old regulations. Immerse yourselves in the new regulations. I cannot stress the importance of that in going forward. One of the things that I think about the last time we had the issuance of performance standards is, 20 years ago, I was in the field. I never really appreciated the importance of the preamble.

Ann: So, we've talked a lot about the standards. But, Colleen, can you speak to the importance of the preamble and how it has informed us of where we are today?

Colleen: Yes. So, as Ann said, the first part of the regulation, the final rule that we're putting out today, is what's called the preamble. And so that lays out why we have put these regulations out. So, what's the rationale behind it? The other thing that's really important that it does is it lays out a summary of all of the comments we've received on each one of the sections. And so it talks about what the commenter said, both positive and negative, and then lays out again the reason the decision that was made, what's in the final rule.

So it really does a good job both of laying out the research and the rationale behind the changes and also talking about what we heard from the field and where we made changes. Because there are some significant changes in this final rule, compared to what was in the NPRM. Sometimes going back and picking things up that were from the old standards. Sometimes getting an idea from the field that we went forward with something different. So I think we're going to talk about those but also make it clear, while Blanca is telling us we want to go forward with what's new and immerse ourselves on that, we really feel like we're building on the important work that's in there.

So it's not to say the current standards are bad, just that we think this is next step that builds on what was great there, what's the foundation, and what research tells us that we need to move forward.

Ann: And, I think, Dr. Enriquez, one place in the preamble that I'd ask you to comment about was how we were moved -- and I suppose the final rule was impacted by many comments around the parental role, particularly the Parent Committee. Could you speak to a little bit about that and the comments that we received?

Dr. Enriquez: Yes, Ann. The Head Start field was very loud and clear on the foundation and the strength of family engagement and parent engagement, as well. We listened; and from the NPRM to the final regulation, you will see that we put back in the Parent Committees, we reinforced and kept the Family Agreement plans, as well, and of course, one of the biggest things that we did is we revised the impasse procedure to include arbitration and mediation.

Ann: And again, the other big-ticket item, I think, in the preamble that reflects differently, again, in the final rule was the whole issue of duration, Colleen.

Colleen: That's right. So, if folks remember, in the NPRM, we had proposed that all center-based Head Start slots would move to 180 days a year and six hours a day, to be a full school day and a school year, and that it would happen quite quickly, within one year, with a possibility of an extension. We heard from the field loud and clear that people were concerned that the timeline was too fast. They were concerned about the resources being available to support this, and concerned about a lack of flexibility with the days-and-hours approach. And many suggested that we, instead, should adopt an annual-hours approach -- give grantees the amount of hours that they should meet over the year, but let them design how they do that. And that's exactly what we picked up in the final rule.

Ann: So we are saying that, over time, all Head Start center-based slots should be at 1,020 hours, so the equivalent of 170 days for six hours. But the grantees can determine how they do that. A grantee could say, "We're going to do 4 1/2 hours a day for longer numbers a month," or, "We're going to do 6 1/2 hours a day for fewer numbers of days." And they can align with their school system if that is a way that they would go forward. I think the other, if you could speak to the other big change in duration, which is, for us, getting back to where we wanted to be in the beginning, was the change in Early Head Start. Could you speak to that?

Colleen: Yes. In Early Head Start, we also are going with this annual-hours approach that was suggested by many commenters. But for Early Head Start, because, like you said, Ann, it's always been and supposed to be a continual program, that annual hours is 1,380. So, 1,380 hours. But a program has the flexibility how to meet that, depending on what makes the most sense in their community. And we have -- we'll talk about at the end -- kind of the timelines for Early Head Start, because we're so close.

Ann: Exactly. We're having people still stay on getting to that 100 percent within the next year or with an extension. For Head Start, where we acknowledge there is more room we really need to grow, we have taken the suggestion to put it on a five-year timeline. And so we're not proposing that we would get to that full implementation until 2021, with an interim kind of step as we go. So, as we talk about hours matter, intensity matters, dosage matters, I'd like to shift to sort of the educational services. And where have we sort of shifted our focus there, Dr. Enriquez?

Dr. Enriquez: What the standards do is they strengthen education services for children birth to 5. We look at all education from that lens -- birth to 5 -- where the performance standards will reflect the latest research in education and best practices, again I stress, for children birth to 5. Of course, it begins with the assessment and the screenings of children so that programs can use that data for individualizing the instruction, looking at curriculum that needs to be content-rich and with a developmental scope and sequence. And all of that ties down to supporting effective teaching practices with a very strong system of professional development for our teachers, as well. And of course, we've also looked at the education services for home-based. Those are newly articulated. And can you take us through what we did -- the changes that we did in home-based?

Colleen: Yeah. So, in home-based, as Dr. Enriquez said, we lay out for the first time much more clearly the expectation not only that the home-based services will receive the full family engagement and health comprehensive services, but also that what we want to be happening in the education services to support that parent as that child's teacher is much better articulated than it had been previously. Again, based on what's going on in many high-quality programs, but that wasn't well articulated in the standard. And the other big change in home-based is, in the NPRM, we had proposed to remove home-based as a standard option for Head Start-age children -- for preschool-age children. And we have put that back in. We heard, again, from the field, from commenters, that people felt like that was a very important option for them, for some families or in some communities. And so, in the final rule, we've put Head Start home-based back as a standard option as long as it isn't the only option that preschoolers are offered in that community.

Ann: And, Dr. Enriquez, when we think about supporting children, we've certainly had a long history of supporting children with disabilities. I would say, in the last probably 15 years, homeless children also, a deep commitment. But this, I think, goes further, these standards. Could you talk a little bit about sort of the inclusiveness of supporting all children and what some of the differences are -- changes are in the standards?

Dr. Enriquez: Well, we certainly strengthen all services for children, and we recognize that we have children with very unique needs. And as you mentioned, the performance standards require individualized and inclusive services for children with disabilities, improved services for children in homeless situations, as well as children who are in foster care. And when you talk about dual-language learners, we have a very strength-based approach for dual-language learners. We also paid very close attention to individual child attendance, where we are asking programs not just to determine which child is absent today, but to track the attendance of each individual children and have strategies in place to assure the children are coming to school, because that has a lot to do with their learning and their development. We were very, very explicit about prohibiting expulsion and, of course, limiting suspension in our regulations.

Ann: And when you say that, I'm sure people that are not in Head Start might say -- or just people dealing with small children -- would say, "Why would suspension or expulsion be an issue for preschoolers?" And, Colleen, I think we've learned something over the past couple of years.

Colleen: Yes. I think, in Head Start, we've really had a culture where that is not a widespread practice. And we think that's absolutely what should be continued. But, unfortunately, we have seen in research that in preschool settings -- some in Head Start but some in other preschool settings -- it is much more common than you would think, that suspension and even expulsion being used as a way to deal with children's challenging behaviors. And we felt like, even though we don't think that the culture of Head Start has supported that, that we really needed to be explicit and to make it very clear that that is not something that can be used, and the steps that programs need to do to support families and teachers and children with challenging behaviors so that we don't get to that point. But we wanted to be crystal clear that that is not something that can happen in Head Start programs.

Ann: I think it's a nice segue, Dr. Enriquez, in talking about supporting family engagement and strengthening families. Could you speak a little bit to what the changes are?

Dr. Enriquez: Yes. Family and parent engagement have been very foundational for Head Start, as we know, over the past 50 years. And what the standards do is they call for integrating strategies throughout the systems and the services of the programs. Whether you are implementing health or education or mental health, parents must be an integral part of those services. We are asking programs to do research-based curriculums with outcomes and to track the parents' outcomes, as well as the family partnership agreements, where parents are assisted to develop goals, to provide strategies for meeting those goals, and to track those goals so that the end programs should have very specific outcomes for their parents in their programs.

Ann: And that's a leap, I think. And it really, I think, aligns with what we've been doing with our preschoolers and our infants and toddlers, really asking programs, again, to use their data to be able to determine how much progress children have made and what kind of supports they need. And I think, in the family engagement, one thought came to mind. And it's not us doing for parents. It's families establishing their own goals and us, as providers, programs out there, figuring how to support the parents to achieve the goals that they want.

So, as we begin to think about we're working with families, we're strengthening the professional development of our staff, we also move towards more alignment with thinking about early-childhood education across the board and looking at what systems we connect with. And I don't know, Colleen or Dr. Enriquez, do you want to take a crack at helping us understand where we are trying to align more and there's movement?

Colleen: Sure. So, there's quite a few places. One, in the health area, the health-services component, we're both doing things to really bolster our health provision and how do you make sure that we're keeping up with the most pressing concerns in the health area, but also building on what's very strong. And so just kind of making things clearer, but seeing are there places where we can align with other services or systems, as opposed to duplicating.

So, in state health and safety is an area where we have moved away from a level of prescription that were in our old standards and to more put it about the grantees creating systems to ensure their facilities, their equipment, their codes of conduct all support children's safety. And in doing that, we're hoping, if we get away from telling us exactly how, like Dr. Enriquez was saying before, and we allow can programs to look at state licensing systems that are going to be improving with the passage of the CCDF reauthorization or other systems that can allow them to not say, "For Head Start, I have to have my cribs this far apart, but for my state licensing, I have to make sure they're that far apart, depending on who's looking that day."

So we think the focus on safety systems and allowing to align with other programs could really help programs in not feeling like they've got so many different sets of rules they have to be worrying about, with, the same time, making sure a critically important function of keeping kids healthy and safe is still fundamental to Head Start. And I think this is an area where we know grantees probably have some mixed emotions. While I think many of our colleagues in the community didn't like the prescriptive regulations in the past, sort of not having that prescriptiveness really shifts the onus on them to say, "We're going to be here to demonstrate what kind of an oral-health process we have to ensuring kids good dental health or good nutrition," so they really have to be able to articulate what that system is.

So that is a little bit of a shift and a little bit scary. [Chuckles]

Ann: And so I think that, Dr. Enriquez, there are some other state systems also that the standards speak to. Could you walk us through those?

Dr. Enriquez: Some of the state systems that we are looking at, in terms of coordination and alignment, is quality rating and improvement systems of each of the states, where programs need to be looking at those and aligning themselves to meet those requirements, as well as looking at the state data systems, where we are looking at sharing data and not duplicating so much data. Definitely, a collaboration with the state pre-kindergarten programs that, if state programs, local programs are serving more of the 4-year-olds, then we need to be serving probably more of the 3-year-olds. That way, we're maximizing the resources that we have. Absolutely looking at I.D.E.A. and collaborating with the I.D.E.A. for children with disabilities. And, as Colleen said, alignment with CCDF.

Ann: So, two little flags come up for me. So, when you talk about the QRIS system, and I wonder, Colleen, does that mean that every grantee must participate? And I think the other thing that I can feel my colleagues in the field getting very nervous about, as much as many, many grantees and state associations have said to us, "How can we share data?" "What is that we can share or not with the state or with our local community?" So, could you speak to QRIS and sort of the requirements in a little bit more detail? And also, this whole issue about how are we protecting the privacy of child-level information.

Colleen: Great. And actually, I think, in some ways, they're both connected to sharing data. So, we have proposed the participation in QRIS as something in the NPRM. And we heard both positive and some concerns -- positive feedback and some concerns. And one of the concerns we heard was, "We don't want a lot of duplication of monitoring." So, to the degree that many Head Start programs are participating in QRIS, we think it's been a great way for parents to be able to understand the system and to really drive quality and someplace getting to the types of standards we already have in Head Start.

But programs both want to participate and to figure out how to, but also we don't want to worry about lots of resources and duplication of monitoring going to that. So, where we are, in the final rule, is that we said Head Start programs must participate in the QRIS system in their state if that state will accept Head Start's monitoring data as proof that the programs meet the indicators that are in the criteria that are in their tiered systems.

And so I think it's really going to allow us to work with states over the next year -- this is a requirement that doesn't kick in for a little while -- to say, "How can that data be shared in a way that doesn't add more burden to programs but does allow Head Start programs to be part of more emerging, growing early-childhood systems in their state?"

And on the flip side, in thinking about how Head Start programs have been asking, "What do I need to do about sharing data? When do I have to get parental consent? When do I not need parental consent?" We think that we haven't been as clear as we should have been with programs. And so, right now, I think we're being crystal clear in the final rule that says, "These are the instances when you need to give parents notice but don't need consent. This is when you need to give parents an ability to opt out." Or when you are doing some sharing with a system that has protections in place, you can share that data in way without having to go through those other steps. So that will be something we'll spend more time through T.A. and through lots of the things that are going to be available. We're going to talk about this after this webcast, getting more into the weeds of. But I think programs will be relieved to have clarity around that issue.

Ann: I think there are two other issues that we want to cover before we bring to a close. And clearly, everybody in the Head Start community is saying, "Okay, today they were issued. When are they in effect? When do we have to be in compliance with these quality standards?"

Dr, Enriquez: Most provisions, Ann, are going to become effective 60 days from the publication of the standards. There will be some other provisions that will have later compliance dates. One of those, as Colleen mentioned, was the duration provisions that she outlined, as well. Curriculum requirements, assessment, the QRIS. There will be others that will have a longer period of time for compliance.

Ann: Colleen, you talked a little bit about the duration, you talked about the out-years. I think there's probably another sort of condition there that could you speak to.

Colleen: Sure. So, we did talk about the duration provisions have a longer window, not going fully into compliance for five years, but also having more interim targets. So, by three years from now, by 2019, the requirement would be that programs would have to have 50 percent of their center-based slots at that 1,020 hours. But it also does allow for the secretary to move that target back, based on her assessment of the availability of funding -- her or his assessment of the availability of funding -- to support these provisions. So, it gives us the window. And we have a date certain in the requirements that say, "By this date, we will have to tell, that the secretary has to make the announcement about whether the target stays in place or if it will be changed."

Ann: And is that provision that the secretary has in the regulations the same for Early Head Start, or is that just a Head Start provision?

Colleen: That is just for Head Start. Again, Early Head Start is in the act. Authorizes a continuous program. And most programs are there or are very close. And so, the Early Head Start provisions will go into effect more quickly.

And while they have a waiver where programs could come in, there isn't secretary authority to change that target without going back through the notice-and-comment rulemaking process.

Ann: Dr. Enriquez, the last area we'd like you to discuss is really what are we going to do to help the Head Start community? This is a big year of implementation. For some, it's going to be a bigger lift than others. Can you tell us what the Office of Head Start has in store that will support grantees?

Dr. Enriquez: Ann, at the Office of Head Start, we are prepared to hold people's hands. We will have a virtual showcase that people can go into the ECLKC and watch any section of the performance standards that they need to read and understand for purposes of implementation. We are also going to have a webinar series that is going to air every third Wednesday of every month from 2:00 to 3:30, Eastern Standard Time. Again, that will be an opportunity to go over the standards. And I'm sure we will have a question-answer session. And then we're also going to have our National Centers be producing products and having sessions, as well our T/TA system. We will also coordinate with our associations -- the national associations -- so that we can be present at their conferences to have workshops on the performance standards. And we will culminate with the Birth to Five Leadership Institute. These are some of the things that we have planned for helping grantees with the performance standards.

Ann: And I think you've also committed, to the extent possible, that when there are regional conferences that the associations have this coming year, that we would also want a presence, maybe of our National Centers or also a strong federal presence to continue the dialogue.

Dr. Enriquez: Yes, absolutely.

Ann: Terrific. Thank you. Closing thoughts? And maybe I'll call in -- Let me turn to you first, and we'll reserve the last closing thought for Dr. Enriquez.

Dr. Enriquez: I think my closing thought would really be to thank the community. We put the NPRM out not at the most ideal time, when programs were closing down for the summer in some cases. We were able to keep it open a little bit longer to hear from people. But I really was someone who read every one of the comments we received, was really just so impressed with the community of the thought that people gave, the actual very creative, constructive ideas articulating why they did or didn't agree with things. And I really think it just speaks to how strong this community is. And I feel like we are in a better place for it. In the final rule, I think people still won't love everything. There will be people on both sides of everything, and that's going to be natural. But I really think it is a stronger document for all of the feedback the field gave us.

Ann: And before I turn it over, I've got to get my last word in. But one other thing I was thinking about, Colleen, as you were speaking is, not everyone is going to like everything, and we know that. But also, inevitably, when you produce a major rewrite, as we have done, while we may read through it and say, "We understand everything perfectly," we know, over the months, there's going to be something that people are going to need help in interpreting what the Office of Head Start intended in writing that regulation.

And we want you to know, in the community, we are fully prepared for those things to occur and fully prepared to provide whatever additional guidance we need to do over the coming months. And with that, Dr. Enriquez.

Dr. Enriquez: Well, thank you, Ann, thank you, Colleen, for all of this wonderful work for our Head Start grantees. And as you Head Start grantees implement the new performance standards, you will continue our history of ongoing improvement, a focus on early-childhood education, and our legacy of leading the field in early-childhood education. I know you can do it. I know you can do it. There are many ways of doing it. Be creative. Be excited. Stay calm. And do what's best -- the best interest of children and families for their school readiness and their healthy development. Don't forget, this is a family affair -- children and families. Thank you for all you do.