

## **Head Start Program Performance Standards: Children with Disabilities**

Sangeeta Parikshak: I'm really excited to be here with you today to talk about how the new Head Start program performance standards strengthen services for children with disabilities.

Amanda Bryans: That is an area that is near and dear to me as well. I think that Head Start has been a national leader in inclusion of children with disabilities since the early 1970s and that these new regulations will strengthen that role even more and most importantly, will ensure that we continue to deliver the highest quality services to all children who enroll in our programs.

Sangeeta: Well, that makes me feel really good about what we have to talk about today. In general, just kind of overarching, what are some major areas that you think that really show the strength that we've done with these performance standards around children with disabilities?

Amanda: Well, what the standards really do is implement the requirements that were part of the 2007 statute reauthorizing Head Start. Many programs, virtually all programs I think are already following the requirements of the statute. It's a big change in our regulations, because there used to be a whole section, for example, that identified the kinds of disability's children in Head Start might be diagnosed with. Now, we rely exclusively on the Individuals with Disabilities Education Act, IDEA, for that information.

Sangeeta: When you talk about the statute, you're talking about the 2007 Head Start Act-

Amanda: That's right.

Sangeeta: Which is referenced in the standards.

Amanda: That's right.

Sangeeta: Would you say that the standards they have one particular section where they talk about children with disabilities to really clarify, or are there different sections that folks need to be looking at?

Amanda: Again, I think this is one of the real strengths of the revised, or the new standards, which are much more integrated as a whole and I think easier to follow in terms of what programs must do. You will find lots of language around children with disabilities in the education and child development section, Subpart C. There are some specific information for children with disabilities and their families in Subpart F. Then also, there's information in the management subpart and the subpart on transitions.

Sangeeta: We have Subpart C, which is education and child development services and they ensure that programs include all children, especially those who have an IEP, or an IFSP, right?

Amanda: Yeah.

Sangeeta: There's also kids out there I think who have delays. As you know, I'm a child psychologist, so I've worked with kids who have different diagnoses. ADHD, for example. My understanding is that with the new standards there are ways that we can actually target kids who have delays and different diagnoses that may not qualify for services under IDEA.

Amanda: Exactly. I think that is a really important point and an area we've become more aware of over the last few years since 2007. The first thing that you touched upon is children who may have a diagnosis that doesn't require early special education, or related services specifically, but does require some accommodation in how the program is delivered. That we make it clear in our regulations that a child could have, what's called a 504 Plan under section 504 of the Rehabilitation Act. It is a plan that doesn't maybe involve a specific service, but does involve an accommodation that the program can make, such as a child who needs to take frequent breaks to do physical activity, or needs to hold a toy throughout the day. We expect Head Start programs to make those accommodations, but sometimes it can be very helpful to have a specific plan or instruction under 504 in making accommodations to meet that child's need.

Sangeeta: Especially if they're transitioning, right? We talked about transition services, so if they're transitioning between Early Head Start and Head Start, or from Head Start out of Head Start to pre-K, or some other-

Amanda: Absolutely.

Sangeeta: Or to kindergarten, rather.

Amanda: Absolutely. Having a 504 plan-

Sangeeta: Then having something written can be really helpful.

Amanda: That's exactly right. Then, the other thing that we know happens a lot is that there is ... There's tremendous variation across the country in eligibility under IDEA, so that in some jurisdictions a delay of a certain amount may make a child eligible for a special education and related services. In another jurisdiction the child would not be considered eligible. Children can have delays that are impacting their ability to fully benefit from Head Start, but under which they're not eligible or with which they're not eligible for IDEA services, which would be like an individualized education plan, or an individual family service plan. This set of our new regulations makes it very clear that Head Start programs should access any services that might benefit such a child that are possible. In many states, for example, you can use a child's health insurance or Medicaid for a therapy or a service that the child might need, even when they're not eligible under IDEA.

Sangeeta: I think that's going to be really helpful for both families and children, but also for staff when they're just not sure how to work with a particular child to really have those supports in place for them.

Amanda: Yeah, I think that again, is one of the really big benefits. I don't want to imply that many of these things aren't already taking place. I think they are, but I think having it clearly and transparently articulated in our regulations is going to be a big help to children, their families, and our staff and Head Start.

Sangeeta: Another section also that I want folks to really look at is 1302 Subpart J, so that's program management. There it states that programs must implement a coordinated approach to serving children with disabilities and their families. I just thought it would be nice to take a second to talk about what coordinated approach really means.

Amanda: Right. I think that what this is expressing is the need to make sure that Head Start is providing leadership around the child's needs, what the family knows about their own child as the experts about the child, and how agencies are working together to support the child's inclusion and maximal development. Those agencies include the agencies under IDEA, which is part B for preschool aged children, the local education agency, and part C for infants and toddlers, which are agencies that are providing services for that age group. Again, in many cases our Head Start programs know, but having the language in the regulations can help them as they work with families. Because, as you know from your own experiences in your work with Head Start, parents are really the drivers around the access to services. It's really parents who get invited to the IEP and IFSP meeting and so it's important that Head Start really prepare parents and make it clear that the Head Start program would like to attend those meetings with the parents and the parent needs to let the Head Start program know about the meetings so that the program can do everything possible to support the family as they navigate the system.

Sangeeta: I think what you're really touching upon here is what, one of the things that I love about the standards this time around is that it really, even though we've clarified a lot of things, maybe taken pieces out streamline, we've kept parent engagement as a focal point throughout the regulation. Even within, like you're talking about, within the section on disabilities there is language around how parents can advocate for their children and I think that that's really unique to keep in there.

Amanda: That's right. As you're saying, I think that one of Head Start's core foundations is the recognition of parents as the expert in their own child and that is of course true. When children have delays it is absolutely essential the parent is able to advocate for the child and do it with support while they're in Early Head Start and Head Start and then as they go on in the child's education.

Sangeeta: Excellent. I think that we have covered basically everything related to children with disabilities in the new performance standards.

Amanda: Right. I guess this is just a beginning. Is that right, Sangeeta? This is a privilege to provide this introduction, but we are far from finished and over the next months we will be offering many more resources to support the implementation of the new regulations and we, as always, look forward to continued discussion with our programs and with families in Head Start and Early Head Start.