

TESTIMONY FOR THE COMMITTEE ON EDUCATION AND LABOR

Subcommittee on Early Childhood, Elementary and Secondary Education

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I wish to thank the committee for inviting me to speak on behalf of Head Start and I will focus my remarks on two very critical elements of Head Start program operations, the HHS monitoring process and the Technical Assistance system. Each of these elements is basic to the foundation of continued high quality Head Start services and service delivery.

A high quality, fair and balanced monitoring system is needed and welcomed by local Head Start programs. All of us who care about the integrity of the Head Start program support a process for the identification of poorly performing programs and ultimate closure of these programs if they do not meet the standards. Poorly performing Head Start programs should not be allowed to exist. We all want to see every Head Start program function consistently at a high quality performance level as they provide needed services to our children and families. Our children deserve nothing less.

The triennial Head Start review requirement has been in place for nearly the entire history of the program. Over the years, the process has been developed and redeveloped in efforts to make it useful and informative for program improvement, and has in some cases resulted in poorly performing programs being shut down. With the development of the Revised Head Start Performance Standards in 1997, a concerted effort was made to align the review process and accompanying instrument with the standards. In 2000 the PRISM - Program Review Instrument for Systems Monitoring was introduced and put in practice. The process and the instrument have been revised almost annually since that time.

The original intent was to create... *"an integrated, comprehensive and outcome-focused approach to ensure compliance with regulations. This approach promotes quality and supports programs in delivering services for children and families in a more holistic manner"*.

Beginning in 2005, HHS implemented major changes in the system, which they defined as an attempt to improve the process. The new effort focused on systems integration and interrelated areas of non-compliance. Regrettably, these changes have led to an approach which has been experienced by grantees as NOT being supportive, certainly not outcome focused, and primarily punitive in nature. In some cases these reviews have been fraught with nit-picking. **The current review protocol contains over 300 inquiries each with multiple segments, which add up to over 1,000 specific questions - all of which require documentation. A negative answer to any one of which will lead to a finding of non-compliance.**

While the methodology and direction of the process is dictated by the Office of Head Start and ACF, the monitoring process is managed by an outside contractor. The current model for triennial reviews includes the use of Head Start peers and content experts as reviewers and federal ACF staff as team leaders. All receive training in the processes which are put in place each year. The training often frames the style evaluators use to conduct reviews and in recent years, evaluators have been prompted to find fault, vigorously pursue non-compliances and at the same time are admonished not to make positive comments.

In 2005, changes to the 2006 PRISM protocol included a written **regulation that required only the reporting of compliance problems** and totally eliminated the reporting of program strengths. During that year, evaluators were told *to create a reviewer mindset and think like a witness*. A piece of training material used for evaluators titled **Litigation Perspective – Reviewers as Witnesses** includes the instructions “Don’t think like a bureaucrat doing an in-house review – *think like a witness* preparing for hostile cross-examination by the grantee’s attorney. Prepare to defend your findings and your own credibility!”

Additional materials used to train reviewers within the last two years include a 42 page presentation on guidance for **Writing Defensible Preliminary Areas of Non Compliance (PANCs)** instructing reviewers how to write defensible narratives when describing non-compliance findings and a 38 page Reviewer Training overview presentation which cites as a goal for monitoring in FY 2007 ...“Continue to have review teams emphasize exception monitoring”. Exception refers only to non-compliances and deficiencies, and at the exclusion of program strengths.

Comments have been heard by Head Start staff that reviewers are instructed by team leaders to keep looking if they don’t find non-compliances. Reviewers have been heard saying that they will keep digging until they find something and in current web cast training presentations for program directors slated for a review, directors are quickly warned that there are over 1,600 measurable points each of which can result in a non-compliance.

In 2005, policy was established not only for follow-up visits where non-compliances and/or deficiencies are found, but re-reviews as well. Re-reviews occurred primarily in those programs that had few or no non-compliances. The purpose of the re-review, we were told, was to check the validity of the review team and process. One medium sized program in the midwest was found to have six minor non-compliances during their triennial visit. This initial visit had a team of eleven members from all parts of the U.S., they were revisited three weeks later, with a totally different team of eleven members from all parts of the U.S. and then six months later received a follow-up visit with three team members from all over the U.S., to ensure that their six non-compliances were corrected. A conservative estimate on the dollar cost to the system for this evaluation process in one medium sized program is over \$120,000.

This negative approach and emphasis on evidence gathering of wrongdoing has caused the monitoring process to move away from what should be the most important reason for a team to visit an agency which is to review the actual progress made by the grantee in achieving child and family outcomes. The very reason Head Start agencies are funded in the first place - to make a difference in the lives of at risk children and their families, and to get children ready for school and life is never actually measured in a typical site visit. This negative approach has also created an overall climate of fear and distrust on the part of grantees, creating defensive posturing that is non-productive and energy draining. The process should be a partnership of support. Best practices in organization assessment dictate that both strengths and weaknesses be identified. Strengths should be lauded and where weaknesses are identified, direction and support for correction should be swiftly provided.

There is no question that the Office of Head Start puts enormous energy and concerted effort each year into fine tuning the review process in ways to make it thorough, fact finding and highly professional. Nor is there question regarding the efforts put forth by OHS and the contractor to make the process work well and go smoothly. Despite these good intentions, however, there have been significant problems in the last three years which have added to the frustration experienced by local grantees.

- In some cases, it has taken the Office of Head Start over six months to officially inform the grantee of the findings in a review. In one state the average time for receipt of the communication from the Office of Head start was over four months after the visit. The recommended best practices dictate a maximum 45 day turnaround time for OHS.
- In some cases grantees have been blindsided with a list of non-compliances and/or deficiencies which were not communicated during the review but appear on the report.
- The "human element" within the process fostered a multiplicity of issues
 - In many cases, grantees cited inaccuracies on the part of reviewers, misinterpretations of data or interview information leading to inaccurate findings
 - In many cases, grantees cited experiences of rude, overbearing and/or intractable reviewers whose demeanor was problematic during the review
 - In many cases, grantees cited experiences of reviewers not having the expertise to review a given component
 - In some cases, grantees cited experiences with team leaders who did not appear to take full leadership responsibility for the team

We acknowledge that both the providers of the review and the programs receiving the review are inclined to be defensive because of the very nature of the review, however, the whole process of monitoring and evaluating Head Start programs every three years is an institutionalized custom that could be and should be a far better experience and have far greater outcomes for both HHS and the grantees than is currently the case.

It is absolutely essential, given the intensity of the review process, and the costs associated, that EVERY Head Start program should emerge stronger and improved as a result of the review. The current PRISM Protocol has ten sections and over three hundred multi-part questions, each requiring an extensive multi-part answer and all requiring supportive evidence. Each of these sections and each of these questions could provide enormous learning opportunities for both the Head Start program and the review team. Every year, the Office of Head Start sends over 550 primary review teams out to the field to conduct in-depth evaluations of programs, yet from this effort we have gained no organizational or industry wide exemplary practices or strengths; we have only lists of weaknesses. Instead of the extensive dollar costs of these reviews being seen as an expense to the Office of Head Start, these dollars should be viewed as and treated as an investment, with the process of reviews positioned so that the results are an industry wide progress report and a knowledge base of Head Start best practices.

We strongly encourage the Office of Head Start to consider a renewed effort at improving the review process and develop a system that:

- Provides a fair and balanced process that identifies program strengths as well as weaknesses, and provides ongoing support for programs to correct weaknesses when they are identified.
- Is outcomes oriented, and looks for and documents family and child progress, creating publishable accounts of program strengths and best practices.
- Swiftly closes and replaces programs that cannot/will not correct deficiencies.

Interestingly enough there has been, up until now under the current system, little direct connection between the HHS monitoring review process and the TA system established by HHS. Any support grantees might receive prior to a triennial review and/or following a triennial review while working to correct non-compliances or deficiencies is at best, uneven across the nation, and in worst cases, non-existent.

The history of federal Training and Technical Assistance support for Head Start programs, like the monitoring system, dates back to the beginning of the program. A long list of contracting organizations has been in place across the years to provide support, training, consulting and direction to program providers. Some have been more useful than others. Beginning in 2003, the *Training* portion of Training and Technical Assistance was essentially dropped in favor of a greater emphasis on *Technical Assistance*. Current contractors focus primarily on providing technical assistance to local programs.

At the present time there are no fewer than thirteen Head Start National Contracts for Training and Technical Assistance. Six of those contractors are in place to provide direct support to grantees within the twelve Head Start regions across the country. Their purpose, as stated in an AFC publication, is to "build grantee capacity by providing comprehensive, individualized technical support to Head Start grantees...by working in partnership with ACF and grantees; assisting grantees to comply with laws, regulations and standards; participating as a joint problem solver, observer and strategist; enhancing collaborative partnerships with local, state and federal entities; supporting grantees with Head Start priorities, initiatives and special projects; gathering and disseminating current and relevant research " This mission is appropriate and solidly applicable to the role of a Head Start TA provider. Regrettably, however, at this point in time there appear to be great gaps between mission and service delivery.

First - because of the number of different contractors providing these services, there is an uneven delivery system across the country. Some regions have a solid and high quality delivery system with highly competent content specialists and local TA specialists working in the field. In other regions the service delivery is more uneven. There are differences even from state to state in how technical assistance is delivered and in the intensity and quality of the service. Further, there appears to be a general belief on the part of individual grantees that both the extent of services the current TA system has to offer, and the professional capacity of some of the TA specialists is limited.

Second - in many instances, grantees report that their individual TA Specialists spend inordinate amounts of time filling out forms, ensuring that data is recorded in just the right order, and redoing paperwork so that the reporting format is uniform. It appears that more time and effort is spent in ensuring correct report development than in providing actual technical assistance. In some regions the primary responsibility for a TA Specialist is to work with the grantee to develop a training plan. Training Plans must be developed by the grantee in a time frame which coincides with their grant fiscal year and prior to sending their grant to the Regional Office for renewal. This timeframe may or may not line up with the school year, thus making the projection of training needs difficult and often forced. Once completed, the training plan must be submitted through a series of approvals and ultimately to the Regional Office for final approval. The grantee is notified once those approvals have been completed. Whatever follow-up occurs between the TA specialist and grantee beyond that is reported as sporadic and not particularly useful.

Extensive feedback from grantees regarding their relationship with the TA system includes:

- We have not seen our TA Specialist in about 10 months. I occasionally get an email with some sort of article forwarded once a year.
- I would have appreciated some sort of contact prior to our Federal Review, maybe even a prep session. We got nothing and I spent our own TA dollars for another resource.
- Our TA Specialist is not particularly skilled in meeting our needs. We do not get timely responses from her, nor is she responsive to our needs. Sometimes it has taken as long as six months to get answers to our questions.
- Our agency has not made much use of the TA system. The meetings with their staff are tedious, often endless and without benefit to my program. The staff is not reliable and does not follow-up on commitments they have made.
- Our TA person is very nice, but not particularly useful to our agency. She contacts me in October, shows up one day to review the plan that my staff and I have already written, and I hear from her one more time when she tells me the plan has been approved. That is it. If I really needed support and technical assistance with a major program issue, I would not contact her for help.
- My perspective on the current TA system is that our Head Start team actually plans, develops, prepares and executes the TA Program Assessment and the Training plan. The consultant's role has been to make visits review the plan (and ensure that it is written in the correct format) and pass our work along to the Regional office for approval. I do not experience any real consulting from this system or this person and I question the value of what we receive.

Most grantees have stated that the T/TA system in place during the years 1993 through 2003 was exceptionally better than the system now in place.

Third - as evidenced by the forgoing comments from grantees, the system appears to offer little of substance for grantees. Although training is not a major focus of the system, on occasion cluster training within a state is offered if there is an identified training need common to several geographically close grantees. Even this effort has been sporadic within regions, and success is largely dependent on the skills of the trainer. It is important to note that current TA Specialists are not necessarily content area specialists and most are not skilled trainers.

In most states and regions, state and regional Head Start Associations sponsor regular training conferences and events. This is an important part of the overall Head Start training network. Historically, the regional Head Start T/TA provider was actively involved with these events. Agendas were developed in partnership with the TA provider and the TA staff members were often training facilitators. In the current system, in most regions, there is no easy partnership with the Associations, and permission must be established six months in advance to even get a TA specialist to attend an Association Head Start conference.

In 2005 there was a study on the effectiveness of the current TA system, conducted by a national contractor. The results of that study have not been published or released by the Office of Head Start, and yet the findings might very well be useful in redefining how TA could more be more successfully delivered to grantees.

Technical Assistance must be closely tied to program performance. Support must be available to grantees when there is a decline in any area of best practice. Enormous amounts of data are available to grantees to enable them to analyze needs and develop specific technical assistance plans. Most grantees don't need help in identifying their needs and developing plans; they need high quality professional help in solving the complex problems that cause them to slip in exhibiting best practices. Reauthorization 2007 will bring the Head Start community many new, exciting challenges and as we move forward with these challenges programs will benefit from the availability of highly qualified organizational consultants who understand the complexities of Head Start. We will not need help in filling out forms.

It is relatively safe to say that in the coming years, local programs will be faced with many new challenges. Among them will be:

- Major organizational culture shifts
- Expansion to new lines of business
- The challenge of collaboration versus competition with state funded pre-K programs
- Escalating expenses and limited sources of new income
- Major changes in the framework of the families we serve and the cultures from which they come
- Much greater complexity in how to design effective program options and service delivery to meet the needs of changing communities
- Much higher expectations for child outcomes
- An escalating need to have all staff with higher levels of formal education
- A much greater need for ongoing training and staff development in topics that have grown in complexity

The Technical Assistance and training system in place to support this range of needs will have to be carefully designed and successfully executed. The world of Head Start is incredibly complex and deserves a support system that acknowledges those complexities and has the resources to deliver. The future will require a system that includes a foundation of support not only for local programs but for regional and federal overseers as well, and the support must come from highly qualified, highly professional sources who understand not only the complexity of Head Start and the growing field of early childhood services, but who also know the complexities of organizational development and systems management. Head Start is a seven billion dollar business, requiring world class supports.

We need a TA system that at least:

- Has the capacity to understand the complexities of Head Start and the growing state Pre K efforts, as well as organizational structures; systems management; and futuristic thinking
- Works in active and supportive partnerships with local programs, state and regional Head Start Associations and regional offices
- Sets jointly defined work goals with the above organizations
- Has the capacity to employ qualified professional staff assigned to work with local programs
- Has the capacity to ensure their staff has ongoing training to maintain their professional standing
- Establishes a unified approach across all states and regions to ensure an even delivery system