

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**MIGRANT HEAD START GRANTEES:  
PERSPECTIVES AND CHALLENGES**



DECEMBER 1993

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Department of Health and Human Services

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DECEMBER 1993    OEI-09-91-00761

# EXECUTIVE SUMMARY

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## PURPOSE

This inspection identified and assessed the expansion experiences and challenges of selected migrant Head Start grantees and delegates.

## BACKGROUND

At the Federal level, the Department of Health and Human Services' (HHS) Administration for Children and Families (ACF) is responsible for administering Head Start. The ACF awards grants to a public or private nonprofit agency (called a grantee) to operate a Head Start program. A grantee may contract with one or more other public or private nonprofit organizations in the community (called delegates) to run all or part of its Head Start program. The Migrant Programs Branch within ACF's Head Start Bureau oversees all migrant grantees. Nationally, 28 grantees serve approximately 28,000 migrant children with a total annual budget of \$88.8 million.

Migrant Head Start provides valuable services to a population that otherwise might not receive them. Migrant families' lives are complicated by their transitory nature, language and cultural barriers, and inexperience "navigating the system." Migrant Head Start grantees provide children with a safe place to learn while their parents work. They ensure that each child's health, nutrition, and other basic needs are met. Like non-migrant (hereafter referred to as "regular") Head Start grantees, migrant grantees also are required to identify and address the needs of the entire family.

Migrant grantees are very different from regular Head Start grantees. They serve a broader age range of children--including infants and toddlers--who require different facilities, equipment, and staff skills. Grantees must be able to provide services for children whose parents work 10 to 14 hours per day and 6 to 7 days per week. In addition, grantees must provide services in a shorter timeframe, because families may not remain in the program for more than a few weeks before leaving the area.

Both the Administration and Congress are committed to expanding Head Start. Since Fiscal Year 1990, Head Start total funding has increased more than \$1 billion, adding almost 300,000 children. Based on concerns about grantees' ability to handle expansion, ACF, the Assistant Secretary for Management and Budget, and the Assistant Secretary for Planning and Evaluation requested that the Office of Inspector General (OIG) review the implementation and status of Head Start expansion. These Department officials were concerned that rapid expansion might jeopardize the quality of services that grantees provide to children and families. The Head Start Migrant Programs Branch Chief expressed similar concerns about the impact of expansion on grantees that serve migrant children and families.

This report is one in a series prepared by the OIG on Head Start expansion. Two other reports in the series, "Head Start Expansion: Grantee Experiences" (OEI-09-91-00760) and "Evaluating Head Start Expansion through Performance Indicators" (OEI-09-91-00762), describe regular Head Start grantees' experiences with expansion.

During September 1992, we conducted on-site visits and structured interviews with six migrant Head Start grantees and delegates whose enrollment totals 28 percent of all children in migrant Head Start nationally. We selected the grantees and delegates based on the size of their expansions in 1990 and/or 1991. During the interviews, we asked grantees to describe their experiences and opinions about operating a Head Start program and their predictions about the future. Our goal was to obtain information that would provide a "snapshot" of selected migrant grantees' ongoing operations as well as their experiences with expansion. In response to ACF's comments on the draft report, we also conducted brief follow-up interviews with the grantees and delegates in August 1993 to obtain additional information about their facilities. We did not conduct a comprehensive management or file review to verify the accuracy of the grantees' opinions and predictions. Nevertheless, we believe our findings will offer policymakers valuable information about major issues and problems facing migrant grantees.

## FINDINGS

The following findings reflect the experiences and opinions of the six migrant grantees that we interviewed.

### *Some Head Start performance requirements may not be appropriate for migrant grantees*

The sampled grantees expressed concerns about many of the major performance standards, including parent involvement, home visits, medical and dental screens, and enrollment and education. Although ACF recognizes that the standards should not be strictly interpreted for migrant grantees, specific guidelines have not been developed and disseminated.

### *Some of the proposed infant and toddler program standards may be unrealistic*

Some migrant grantees may not be able to comply with several of the requirements contained in the proposed Head Start standards. Grantees are particularly concerned about the standards concerning child-to-staff ratios and medical examinations. The ACF is aware of this and will consider the grantees' concerns and comments before the standards are finalized.

***Delayed funding and unreliable information about the migrant population frequently hinder grantees' ability to plan***

All sampled grantees reported that delayed expansion funds inhibited planning, forced loans, and caused carry-over balances. In addition, the grantees experienced planning problems because of the lack of demographic information about migrants and the migrant stream.

***Sampled migrant grantees experienced some of the same problems with expansion as regular Head Start grantees***

The six grantees described difficulties acquiring adequate and affordable facilities, providing transportation for children, hiring qualified staff, and meeting the Federal match requirement. The grantees overcame these problems but are concerned that the problems will be exacerbated with future expansions.

***Grantees are concerned that ongoing and future changes in the nature of migrant work may hinder their ability to serve migrant families***

New job opportunities and conflicting agency definitions of the term "migrant" may present barriers to serving migrant families in the future.

***Sampled grantees cited problems with the on-site review process, the statistical reporting requirements, and the Migrant Programs Branch***

Some grantees have a strained relationship and difficulty communicating with the Migrant Programs Branch.

## **RECOMMENDATION**

***The ACF should include problems specific to the migrant program in the review of Head Start's management***

In the OIG report "Evaluating Head Start Expansion through Performance Indicators," we recommended that the Secretary convene a task force to review ACF's management of the Head Start program. On June 11, 1993, the Secretary appointed the Advisory Committee on Head Start Quality to conduct an in-depth study of the Head Start program with particular attention to issues identified in the OIG reports "Head Start Expansion: Grantee Experiences" and "Evaluating Head Start Expansion through Performance Indicators." The Secretary asked the Advisory Committee, which is chaired by the Assistant Secretary for Children and Families, to develop recommendations to improve and strengthen the program in a time of expansion.

As a result of this inspection, we recommend that the Advisory Committee include migrant Head Start in the examination. Because the migrant program is unique, the review also should:

- determine whether separate performance standards for migrant programs would be appropriate,
- assess the cost and potential impact of the proposed infant and toddler program standards on both ACF and grantees,
- determine whether funding and expansion cycles should be tailored to migrant grantees,
- address the changing role of migrant work and whether changes in ACF's definition of "migrant" are necessary,
- determine when it would be appropriate for migrant grantees to purchase property,
- evaluate the timing of the PIR process and the accuracy of PIR data,
- evaluate the role and effectiveness of the Migrant Programs Branch, and
- identify other areas where ACF should grant flexibility to grantees who are experiencing difficulties serving migrant families.

#### **AGENCY COMMENTS AND OIG RESPONSE**

We received written comments on the draft report from ACF. The ACF noted that the migrant program would be reviewed as part of the overall review of the Head Start program ordered by the Secretary. The full text of ACF's comments appears in the appendix. In response to ACF's comments, we conducted follow-up interviews with grantees to obtain additional information about their facilities. The final report incorporates information from the follow-up interviews, including more detail about the facility purchase issue. We also made technical corrections to the findings, clarified that the report is based on the grantees' opinions and experiences, and modified the recommendation to ensure that it more accurately describes the issues that the Head Start task force should study.

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# INTRODUCTION

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## PURPOSE

This inspection identified and assessed the expansion experiences and challenges of selected migrant Head Start grantees and delegates.

## BACKGROUND

Head Start operates on the premise that children are best prepared for success in school when they and their parents participate in a comprehensive program that addresses their educational, economic, social, physical, and emotional needs. In addition to providing children with classes and health services, Head Start addresses the needs of the entire family.

### *The Head Start Program*

Head Start is a child development program funded primarily by the Federal government. The Administration for Children and Families (ACF) is responsible for administering Head Start. At the headquarters level, ACF's Head Start Bureau provides leadership and develops legislative and budgetary proposals for Head Start management and operations. In each regional office, ACF's Head Start and Youth Branch monitors all Head Start programs, except migrant and Native American programs, which are monitored by branches within headquarters. According to ACF, Head Start served approximately 622,000 children with Federal support of \$2.2 billion in Fiscal Year (FY) 1992.

Head Start programs are community-based, so agencies can respond to local needs and coordinate with other community organizations. As a result, program options, locations, and hours vary. The Federal government awards grants to a public or private nonprofit agency (called a grantee) to operate a Head Start program. A grantee may contract with one or more other public or private nonprofit organizations in the community (called delegates) to run all or part of its Head Start program. For the purposes of this report, we will refer to both grantees and delegates as "grantees" unless specific differences need to be noted.

Head Start programs consist of four major components: *health, education, social services, and parent involvement*. Specific performance standards, which have been published in the Code of Federal Regulations, require among other things that grantees:

- develop children's intellectual skills by encouraging them to solve problems,
- provide children medical and dental examinations,

- offer children nutritional meals and snacks, and
- identify families' social service needs and work with other community agencies to meet those needs.

All grantees must comply with the performance standards. In addition, ACF has issued guidance material which elaborates on the intent of the performance standards and provides methods and procedures for their implementation. The guidance material, however, is not mandated.

### ***Migrant Head Start***

In 1969, Congress funded the Indian and Migrant Programs Division (IMPD) to separate Native American and migrant Head Start from regular Head Start administration. In 1984, IMPD split into two separate branches. Today, ACF's Migrant Programs Branch oversees all migrant Head Start grantees. Nationally, 28 grantees serve approximately 28,000 migrant children with a total annual budget of \$88.8 million.

The ACF limits eligibility for migrant Head Start to families

...with children under the age of compulsory school attendance who change their residence by moving from one geographic location to another, either intrastate or interstate, within the past 12 months, for the purpose of engaging in agricultural work that involves the production and harvesting of tree and field crops and whose family income comes primarily from this activity [45 CFR 1305.2(1)].

Migrant grantees may administer *homestate* and/or *upstream* Head Start programs. Homestate grantees provide services from 6 to 9 months per year in what is considered a migrant family's home State. Upstream grantees provide services for 3 to 7 months to families as they travel in search of agricultural work.

Migrant Head Start provides valuable services to a population that might not otherwise receive them. Migrant families face numerous barriers to obtaining services on their own. Their lives are complicated by their transitory nature, language and cultural barriers, and inexperience "navigating the system." Often they are unable to obtain services such as housing assistance and Medicaid, because they are not residents of that State or locality. Migrant Head Start addresses these problems and more. Grantees provide children with a safe place to learn while their parents work. They ensure that each child's health, nutrition, and other basic needs are met. Like regular Head Start, migrant grantees also are required to identify and address the needs of the entire family.

Migrant Head Start programs face unique challenges. For example:

- Grantees serve children 0 to 6 years old, compared to regular Head Start grantees who serve primarily 3- to 5-year-olds. Serving infants and toddlers requires different facilities, equipment, staff skills, and more staff per child.
- Grantees sometimes must move their facilities if the migrant stream changes due to weather or crop conditions.
- Grantees often must provide services such as health screenings and social service referrals in a shorter timeframe because of the short program year and the fact that families may not remain in the program for more than a few weeks.
- Because of the nature of agricultural work, grantees often must provide services for 10 to 14 hours per day and 6 to 7 days per week.
- Grantees must have qualified, bilingual staff to serve migrant families effectively.
- Grantees must help families obtain services--such as Medicaid and State or local social services--that are difficult to arrange because of migrant families' transitory nature.

To assist with planning, some grantees use the Department of Education's Migrant Student Record Transfer System (MSRTS). The MSRTS is designed to track school-age children through the migrant stream. Migrant Head Start grantees may find MSRTS data useful when attempting to determine how many families will enter their service areas during a particular year.

### ***Proposed Standards for Infants, Toddlers, and Pregnant Women***

In June 1990, the Department issued a Notice of Proposed Rulemaking specifying requirements that govern the operation of Head Start programs serving infants, toddlers, and pregnant women. Essentially, the proposed regulations are intended to ensure quality services and require that:

- grantees maintain low child-to-staff ratios for toddlers and infants. The ratios vary depending upon the age of the children and how many are in each class. The lowest ratio is 3-to-1, for children less than 2 years old in a classroom of 6 children or less;
- grantees obtain physical exams for infants and toddlers at ages 1 month, 2 months, 4 months, 6 months, 12 months, 15 months, 18 months, 24 months, and 36 months;

- each teacher obtain a Child Development Associate credential to serve infants and toddlers within 2 years;
- each grantee provide 40 hours of pre-service training to all teachers' aides; and
- grantees adapt other health, education, nutrition, social services, and parent involvement requirements, as appropriate, to meet the unique differences of serving infants, toddlers, and pregnant women.

***Head Start Expansion***

Both the Administration and Congress are committed to expanding Head Start. The Head Start Supplemental Authorization Act of 1989 and the Dire Emergency Supplemental Appropriation of 1990 marked the beginning of expansion for all grantees and provided funding for the first two expansions. Since FY 1990, Head Start total funding has increased more than \$1 billion, to an FY 1993 total of \$2.779 billion. In addition to the funds that were allocated for expanding enrollment, ACF set aside approximately \$612 million for, among other things, quality improvement, salary enhancement, cost-of-living increases, and training and technical assistance improvement.

The ACF allocated expansion funds differently for migrant grantees than for non-migrant programs. Although ACF allocated funds differently for each expansion, in general, it allocated funds (1) to existing grantees in proportion to each grantee's overall budget, (2) for grantees to compete to serve previously unserved areas, and (3) to existing grantees based on a specific area's need. The following chart illustrates the migrant Head Start program's first 3 years of expansion:

**MIGRANT HEAD START EXPANSION, 1990-1992**

Fiscal Year	Funds Allocated to:		
	Expand Enrollment	Improve Program Quality	Provide Cost-of-Living Adjustments
1990	\$7,515,523	None	None
1991	\$9,766,305	\$3,723,636	\$117,522
1992	\$2,422,430	\$1,720,897	\$182,418
<b>TOTAL</b>	<b>\$19,704,258</b>	<b>\$5,444,533</b>	<b>\$299,940</b>

***Migrant Programs Branch Oversight***

The Migrant Programs Branch monitors compliance with Head Start performance standards primarily by conducting on-site reviews. During site visits, review teams assess compliance with the performance standards using the On-Site Performance Review Instrument (OSPRI). The Human Services Reauthorization Act of

1990 amended the Head Start Act and requires that ACF review each grantee or delegate at least once every 3 years to measure compliance with the performance standards. The Head Start Improvement Act of 1992 requires that ACF also review each new grantee or delegate after its first year and conduct follow-up reviews of all grantees when appropriate.

In addition to conducting on-site reviews, ACF requires each grantee to report performance data annually using the Program Information Report (PIR). The PIR contains data that ACF can use to assess individual grantee and overall program performance.

### *Concerns about Expansion*

The ACF, the Assistant Secretary for Management and Budget, and the Assistant Secretary for Planning and Evaluation requested that the Office of Inspector General (OIG) review the implementation and status of Head Start expansion. Since migrant grantees were not included in the other OIG studies on expansion (see the following paragraph), the Chief of the Migrant Programs Branch requested that we conduct this inspection to assess their experiences.

This report is one in a series prepared by the OIG on Head Start expansion. "Head Start Expansion: Grantee Experiences" (OEI-09-91-00760) used interviews to describe the experiences of regular Head Start grantees and ACF staff during the 1990 and 1991 expansions. According to the grantees, expansion posed problems for them in such areas as child enrollment, facility acquisition, staffing, transportation, and social services. In a companion report, "Evaluating Head Start Expansion through Performance Indicators" (OEI-09-91-00762), we assessed the impact of expansion on regular grantees using file reviews and selected indicators. While we did not find any statistically significant difference in grantee performance as a result of expansion, we found that the level of grantee performance as measured by our indicators was considerably lower than the level of performance reported by grantees and published by ACF. Because of inadequate grantee record keeping, the lack of specificity in the Head Start performance standards, and the fact that many grantees disregard ACF policy guidance, we were unable to determine if the program and performance data weaknesses that we found reflect serious deficiencies in the quality of services provided by Head Start.

### **METHODOLOGY**

We selected three migrant grantees and three delegates based on the size of their expansion in 1990 and/or 1991. To establish the selection brackets, we divided the amount of each grantee's expansion by its total budget. We divided the grantees and delegates into thirds based on the resulting percentage of expansion--small, medium, and large expansion--and selected one from each bracket. In order to achieve a fairly representative sample, additional selection criteria included geographic location and the overall size of the program. The total funded enrollment of the six grantees was

approximately 7,800. This represents 28 percent of all children enrolled in migrant Head Start nationally.

During September 1992, we conducted on-site visits and interviews with each migrant Head Start program director and other appropriate staff. For the delegates in our sample, we also conducted interviews with their parent grantees. At each site, we visited the facility and several migrant campsites. In addition, we briefly examined the grantee's records and file maintenance. During the interviews, we asked grantees to describe their experiences and opinions about operating a Head Start program and their predictions about the future. Our goal was to obtain information that would provide a "snapshot" of six migrant grantees' ongoing operations as well as their experiences with expansion. In response to ACF's comments on the draft report, we also conducted brief follow-up interviews with the grantees and delegates in August 1993 to obtain additional information about their facilities.

We did not conduct a comprehensive management or file review to verify the accuracy of the grantees' opinions and predictions. Nevertheless, we believe our findings will give policymakers valuable information about major issues and problems facing migrant grantees.

We conducted this inspection in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

# FINDINGS

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*The following findings reflect the experiences and opinions of the six migrant grantees that we interviewed.*

## **SOME HEAD START PERFORMANCE REQUIREMENTS MAY NOT BE APPROPRIATE FOR MIGRANT GRANTEEES**

The six migrant grantees that we visited have difficulty meeting some of the Head Start performance requirements because of the short program year, large client turnover, and varied ages of enrolled children. In general, grantees believe that the performance standards should be flexible and take into account the length of the school year and the short period of time that a family is involved with the program. The grantees expressed concerns about several of the major performance standards, including parent involvement, home visits, medical and dental screens, and enrollment and education:

**Parent Involvement:** All six grantees indicated that they have difficulty meeting the parent involvement requirements. Long work days and little time off prevent parents from becoming involved with centers. The grantees expressed frustration with their inability to get parents involved. One grantee stated, "We realize that there are limits to what we can reasonably expect when parents are working hard in the fields for 12 hours a day and then have to go home and feed and bathe their kids. Only about 3 to 4 percent of parents volunteer in the centers."

**Home Visits:** Grantees described particular problems meeting ACF's home visit requirement. Several factors present difficult barriers for grantees attempting to complete the two required home visits:

- families may be in the program only briefly, so it may be difficult to complete home visits before a family withdraws;
- migrant programs run full-day for fewer months, so there is less time in the day to do home visits;
- high enrollment turnover increases the number of home visits that grantees need to complete overall; and
- some parents don't have time or are too tired to participate in home visits because of their long workdays.

**Medical and Dental Screens:** In general, grantees--particularly those who operate upstream programs--try to complete health and dental screens within 30 days rather than the 90 days recommended in ACF's guidance on the performance standards.

Two grantees questioned whether they should have the same health and dental screening requirements for infants and toddlers. "To be required to ensure that a 6-week-old child receive a dental screen doesn't make sense," said one grantee.

**Enrollment and Education:** The number of families in a grantee's service area fluctuates throughout the season. This causes problems maintaining consistent enrollment, class sizes, and average daily attendance. One grantee suggested that ACF allow grantees flexibility to overenroll by as much as 100 percent during certain parts of the program year to compensate for underenrollment during other parts of the program year. Another grantee recommended that ACF use a formula to prepare budgets and tabulate average daily attendance that is based on the sum of children who attended the program each day rather than the funded enrollment.

The ACF Migrant Programs Branch recognizes that migrant grantees experience difficulty meeting some performance standards. Because of this, branch staff are flexible when determining if a grantee is in compliance with certain performance standards.

#### **SOME OF THE PROPOSED INFANT AND TODDLER PROGRAM STANDARDS MAY BE UNREALISTIC**

Grantees expressed concerns about the proposed standards for infants, toddlers, and pregnant women. Three grantees expressed concerns about the lower child-to-staff ratios. One grantee stated, "We need to get the children out of the camps during the day. It's safer to be with us even if our facility doesn't meet child care licensing standards than if they stayed in the camp, unsupervised."

In addition, the grantees believe that the Child Development Associate (CDA) credential requirement for teachers to serve infants would compound their ongoing problems hiring staff. "Requiring a CDA may make it impossible to hire people who will work in a summer program at minimum wage," said one grantee. Two grantees argued that the strict physical exam schedule for infants and toddlers was prohibitive. One grantee stated, "There are so many physicals required. Medical exams for infants are important, but who's going to pay for this?"

The ACF is currently evaluating the proposed standards based on comments it received on the Federal Register publication. Some of the comments reflect the concerns of the migrant grantees. The ACF will take these concerns into consideration as it develops the final rule.

#### **DELAYED FUNDING AND UNRELIABLE INFORMATION ABOUT THE MIGRANT POPULATION FREQUENTLY HINDER GRANTEE'S ABILITY TO PLAN**

The six grantees described problems similar to regular Head Start in planning for expansions and administering services. Because of the unique nature of their



programs, however, delayed expansion funding and poor demographic information make even the simplest planning a challenge.

***All six grantees reported that delayed expansion funds inhibited planning, forced loans, and caused carry-over balances***

Congress determines the timing of expansion proposals and awards and bases it on the regular Head Start program year. The ACF does not alter the cycle for migrant grantees' who administer off-season--such as summer-long--programs. Migrant grantees are required to submit expansion and other grant proposals in March and April. They receive their funds in August or September, which, for some programs, is the middle or end of their school year. As a result, three grantees had carry-over balances during expansion, and two grantees had to secure loans in order to open on time. Grantee comments included:

- We have to start planning more than a year in advance. This is too early for migrant programs. There can be major changes with the migrant population in a short time frame.
- The timing of the funds is atrocious, as the money comes in August or September. This is too late--our program starts in June.
- If we can't get funded in a more timely manner, we may not accept future expansions after 1993.

None of the grantees experienced any difficulty obtaining ACF's approval for carry-over balances.

***The lack of demographic information about migrants and the migrant stream causes planning problems for all six grantees***

Grantees are responsible for estimating the number of migrant children who will be in their area in order to plan their program years and apply for expansion. They sometimes rely on growers and migrant team leaders to give them any available information about the number of migrants who will be in the area. These sources are informal and are not always able to provide data on children. Grantees tend to estimate future needs based on prior years' experiences. One grantee stated, "We open with a guess, and we close when we are no longer cost-effective. We try to keep track of the pregnant women, and we do some averaging."

Grantees find Migrant Student Record Transfer System data of limited use for planning, because (1) it is not up-to-date, (2) its definition of migrant is different from Head Start's, and (3) it tracks only school-aged children. Grantees believe the Federal government should create a national database among all migrant agencies. This would allow grantees to plan 3 to 5 years in advance.

## **SAMPLED MIGRANT GRANTEES EXPERIENCED SOME OF THE SAME PROBLEMS WITH EXPANSION AS REGULAR HEAD START GRANTEES**

The OIG report, "Head Start Expansion: Grantee Experiences," described the difficulties that non-migrant Head Start grantees encountered during expansion. The six migrant grantees described similar--and sometimes greater--problems acquiring adequate and affordable facilities, providing transportation for children, hiring qualified staff, and meeting the Federal match requirement.

**Facilities:** Migrant grantees face the following barriers to facility acquisition: availability, affordability, inability to purchase, timing of expansion awards, and licensing. In addition, community prejudice, the transitory nature of the migrant population, and different licensing requirements for facilities serving infants and toddlers have made these problems more difficult to overcome. "We need a break from the laws," said one grantee. "Right now we can't serve infants and toddlers in the same building as preschoolers."

Five of the six grantees expressed a desire to purchase property for their centers, which will be possible under the provisions of the Head Start Improvement Act of 1992. "Head Start has renovated more churches than we can count," said one grantee. Grantees recognize that weather and other factors can affect the migrant streams, but suggested purchasing facilities in areas with consistent migrant streams and using portables in outlying areas. Grantees further indicated that they would be cautious when using the purchase option. They would complete long-term demographic studies to be sure that the migrant stream would remain consistent and the facility would be cost-effective.

Grantees cited examples of when purchasing facilities would be appropriate and cost-effective:

- ▶ One grantee indicated that it would share purchased facilities with regular Head Start, which would allow it to offer families integrated "one-stop shopping" for services. This grantee has never had to close a facility.
- ▶ One grantee spent \$115,000 to renovate a rented center. It has not had to close any of its centers in 10 years.
- ▶ One grantee has had to close facilities early despite families needing the services because the landlord insists.
- ▶ One grantee runs dozens of centers that have never had to move, even after 15 years.

**Transportation:** Providing adequate transportation is a problem for several grantees. Expansion has resulted in some one-way bus rides in excess of 1-1/2 hours. Grantees described problems with bus insurance and licensing when they cross State lines and

when bus rides are very long. In addition, grantees have difficulty hiring and retaining qualified bus drivers because of their long hours, short program year, and inability to compete with public school wages. One grantee summarized the transportation challenge: "Qualified bus drivers are hard to find. They are paid more in public school, and they don't have to start work at 4:30 a.m."

**Staffing:** Migrant grantees face greater problems hiring and retaining qualified staff than non-migrant programs. Long hours, short school years, low salaries, and inadequate benefits have resulted in severe staffing problems for several of the grantees. Grantees need educated staff who are bilingual, able to handle infants, toddlers, and youngsters, and able to perform multiple duties. Although their salaries are comparable to public schools, grantees believe supplemental compensation is necessary to recruit and retain staff who have these additional skills.

**Matching Funds:** While grantees have been able to obtain some matching funds, they are not always able to achieve Head Start's 20 percent match requirement. Most of the six grantees have obtained waivers from the Migrant Programs Branch that allow them to match at a lower rate. Two grantees are able to use State funds or donated property to meet the 20 percent Federal match requirement. The other grantees have limited success relying on donated services and volunteers. Migrant grantees have difficulty collecting contributions, because they often are viewed as outsiders by the local community, and parent participation is low. In addition, professional services are not readily available in rural areas. One grantee stated, "We are tapped out. Even with a waiver to 10 percent, we might not be able to expand in 1993."

**Training and Technical Assistance:** Like regular Head Start grantees, migrant grantees rely on in-house or private consultants for training needs, because they consider the training more appropriate than that offered by HHS agencies and their contractors. Although grantees have attended nationally-sponsored training, they believe that State and local training agencies, school districts, private consultants, and consortiums best serve their needs, because they better understand how to serve migrant families in their areas. Grantees believe that ACF training is most useful when it deals with ACF processes, rather than service delivery. Migrant grantees also mentioned that they frequently do not have enough time to train staff because of their long program hours and short program year. One grantee is considering closing a center briefly during the school year to conduct staff training.

During the first 3 years of expansion, the grantees were able to overcome their problems with facilities, transportation, staffing, matching funds, and training and technical assistance. A couple of grantees, however, described lengthy delays meeting expansion goals and expressed concerns about expansion's effect on staff morale. Also, some grantees anticipate that these problems will become more pronounced with future expansions.

## **GRANTEES ARE CONCERNED THAT ONGOING AND FUTURE CHANGES IN THE NATURE OF MIGRANT WORK MAY HINDER THEIR ABILITY TO SERVE MIGRANT FAMILIES**

The nature of migrant work has changed over time because of mechanization and new job opportunities. Some migrants now work in fisheries or canneries, although the majority still work in field crops. The grantees we visited are concerned that these families will be excluded from participating in Head Start in the future, because they do not meet the regulatory definition of "migrant." They argued that these families should continue to receive Head Start services. One grantee explained the problem:

Most of the migrant families we serve now have jobs working in the food processing plants. We're concerned that these people may not qualify for migrant Head Start in the future. The manager of the processing plant told me that if it were not for the migrants, he would not be able to operate his plant. And these families are experiencing the same problems and issues as families working in the fields.

Grantees expressed concerns about service agencies that use a different definition of "migrant." Migrant health and education agencies use different eligibility rules than migrant Head Start. One grantee commented, "Various definitions of migrant by different agencies tend to break families apart into bureaucratic pieces. If we all worked together, the whole would be greater than the sum of the parts."

## **SAMPLED GRANTEES CITED PROBLEMS WITH THE ON-SITE REVIEW PROCESS, THE STATISTICAL REPORTING REQUIREMENTS, AND THE MIGRANT PROGRAMS BRANCH**

All six grantees provided specific details about problems with the Migrant Programs Branch's on-site review (OSPRI) process, difficulties completing ACF's Program Information Report (PIR), and communication problems with the Migrant Programs Branch.

### ***Grantees described conflicts in the OSPRI process and complained about the lack of timely feedback concerning OSPRI findings***

A majority of the six grantees expressed frustration with OSPRI teams who they believed were unfair, biased, or "out to find something." According to the Migrant Programs Branch, some of the frustration may have resulted from the vague performance requirements and the Branch's recent attempts to provide more direct oversight of migrant programs.

The OSPRI review teams include staff from other Head Start grantees as well as staff from the Migrant Programs Branch. The grantees we interviewed said that OSPRI team members often have preconceived notions about how a migrant Head Start program should be administered, based on the way they operate their own programs.

This occurred despite instructions from the Migrant Programs Branch to OSPRI team members emphasizing that they "must understand there are several ways and styles of meeting the Performance Standards," One grantee explained, "The OSPRI team members say 'We don't do it this way at our center.'" In addition, two grantees claimed that the OSPRI teams either lacked knowledge about the performance standards or did not understand the challenges of serving migrants.

Grantees also believe that delays receiving OSPRI reports and feedback cause uncertainty about whether they're complying with ACF's performance requirements. One grantee stated, "We still haven't received a reply to our response to our 1990 OSPRI. We don't know whether or not we're on the right track with our improvement plan."

***The PIR may not to be an effective information gathering tool for migrant Head Start***

The OIG report entitled "Evaluating Head Start Expansion through Performance Indicators" (OEI-09-91-00762) found that ACF's directions for completing the PIR sometimes conflict with the performance standard requirements. Migrant grantees offered other criticisms about the substance and timing of the PIR. In their opinion, the report does not measure quality, and the timing is unrealistic.

Grantees believe that if they are going to complete a PIR, it should be tailored to migrant programs. They contend that certain data, such as student-teacher ratios and average daily attendance, are not applicable to migrant programs because of enrollment fluctuation and the children's ages. Grantees also believe that the PIR does not measure program quality. One grantee summarized, "The PIR does not reflect what we do. It only says that we provided a service, but it does not address the quality of the service provided."

Four grantees expressed frustration with the timing of the PIR. The ACF requires grantees to submit the PIR in May, which is the end of the program year for regular Head Start. This is unrealistic for many migrant grantees, since they often administer summer programs, and May is in the beginning or middle of their school year. Therefore, these grantees may submit PIR data that is incomplete or misleading, because it (1) represents only a small part of their program year, (2) is derived from parts of two different school years, or (3) represents services provided during the previous school year which may have ended several months before.

***Some grantees report communication problems with the Migrant Programs Branch***

While most grantees complimented the enthusiasm of the Migrant Programs Branch staff, they complained about communication lapses, the inaccessibility of staff, and delays in funding approvals. Although grantees believe that the Migrant Programs Branch has improved under its current leadership, they have trouble communicating with staff on a day-to-day basis. Grantees frequently complained about the inaccessibility of Migrant Programs Branch staff when immediate technical assistance

or approval for operating decisions is needed. At any given time, most or all of the staff may be unreachable, because they are conducting on-site reviews. "A big problem has been getting approval for renovations," said one grantee director. "We've been delayed 2 to 3 months. We try to call, but their voicemail is often full, because they're always in the field conducting on-site reviews."

# RECOMMENDATION

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## **THE ACF SHOULD INCLUDE PROBLEMS SPECIFIC TO THE MIGRANT PROGRAM IN THE REVIEW OF HEAD START'S MANAGEMENT**

In the OIG report "Evaluating Head Start Expansion through Performance Indicators," we recommended that the Secretary convene a task force to review ACF's management of the Head Start program. On June 11, 1993, the Secretary appointed the Advisory Committee on Head Start Quality to conduct an in-depth study of the Head Start program with particular attention to issues identified in the OIG reports "Head Start Expansion: Grantee Experiences" and "Evaluating Head Start Expansion through Performance Indicators." The Secretary asked the Advisory Committee, which is chaired by the Assistant Secretary for Children and Families, to develop recommendations to improve and strengthen the program in a time of expansion.

As a result of this inspection, we recommend that the Advisory Committee include migrant Head Start in the examination. Because the migrant program is unique, the review also should:

- determine whether separate performance standards for migrant programs would be appropriate,
- assess the cost and potential impact of the proposed infant and toddler program standards on both ACF and grantees,
- determine whether funding and expansion cycles should be tailored to migrant grantees,
- address the changing role of migrant work and whether changes in ACF's definition of "migrant" are necessary,
- determine when it would be appropriate for migrant grantees to purchase property,
- evaluate the timing of the PIR process and the accuracy of PIR data,
- evaluate the role and effectiveness of the Migrant Programs Branch, and
- identify other areas where ACF should grant flexibility to grantees who are experiencing difficulties serving migrant families.

## **AGENCY COMMENTS**

We received written comments on the draft report from ACF. The ACF noted that the migrant program would be reviewed as part of the overall review of the Head

Start program ordered by the Secretary. The full text of ACF's comments appears in the appendix.

## **OIG RESPONSE**

In response to ACF's comments, we conducted follow-up interviews with grantees to obtain additional information about their facilities. The final report incorporates information from the follow-up interviews, including more detail about the facility purchase issue. We also made technical corrections to the findings, clarified that the report is based on the grantees' opinions and experiences, and modified the recommendation to ensure that it more accurately describes the issues that the Head Start task force should study. Specifically, we now recommend that the task force (1) examine what the Federal government (rather than ACF alone) could do to tailor funding streams to migrant grantees and (2) assess how the Head Start facility purchase provisions should apply to migrant grantees. We still believe that ACF's regulation and oversight of migrant grantees using performance standards and funding cycles that are not tailored to them causes problems.

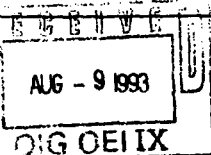


# APPENDIX

## ACF COMMENTS



DEPARTMENT OF HEALTH & HUMAN SERVICES



ADMINISTRATION FOR CHILDREN AND FAMILIES  
Office of the Assistant Secretary, Suite 600  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

August 2, 1993

TO: Bryan B. Mitchell  
Principal Deputy Inspector General  
Office of the Inspector General

FROM: Laurence J. Love  
Acting Assistant Secretary  
for Children and Families

IG	_____
FDIG	_____
DIG-AS	_____
DIG-EI	_____
DIG-OI	_____
AIG-MF	_____
OGC/IG	_____
EX SEC	_____
DATE SENT	8/9

SUBJECT: Comments on Draft Office of Inspector General Report on Migrant Head Start Grantees (OEI-09-91-00761)

Thank you for the opportunity to review the draft Office of Inspector General report entitled "Migrant Head Start Grantees: Perspectives and Challenges."

We believe that the report highlights some of the unique conditions facing Migrant Head Start grantees and some of the problems they face because of these conditions. For example, we recognize that the changing nature of migrant work must be addressed as Head Start expands, and that migrant grantees, like many Head Start programs, have experienced problems dealing with the rapid expansion of Head Start.

As with your report "Head Start Expansion: Grantee Experiences" (OEI-09-91-00760), however, we have concerns about the way in which the information for the report was gathered and the presentation of some of the findings. The general comments which we made on the methodology of that report apply to this report as well. As we did then, we now suggest "that the report provide more descriptive information on the methodology used so that the reader will be aware that, in some instances, opinions or 'predictions' were elicited from the interviewees" (March 15, 1993 memorandum from Laurence J. Love to Bryan B. Mitchell, included as Appendix A to the above-cited report, page 2). The result of the methodology used is a series of grantee opinions which are not balanced by information provided by program officials which would put those opinions in context. Certain of the grantee opinions reported are not factually based, and some reflect self-interest on the part of the grantee or delegate agency.

In addition to the general comments noted above, we have several specific comments, as follows:

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- With respect to your finding that some Head Start Performance Standards may not be appropriate for migrant grantees, the Migrant Programs Branch and the Head Start Bureau work plans for this year include a review of selected Performance Standards which will consider the comments of migrant grantees. While we recognize that some grantees may have difficulties meeting the Performance Standards, we do not envision dilution of the Performance Standards for migrant grantees. Rather, we will focus training and technical assistance efforts on those grantees which have difficulty meeting the Performance Standards.
- On page 8, with regard to concerns about pending regulations, the infant and toddler standards are in draft form and migrant programs' views are being actively considered in developing the final rule.
- On pages 8 to 10, concerning the funding cycle and demographic data, we have several comments. Funding for the Migrant Head Start programs comes from the appropriation for all Head Start programs under the Head Start Act in an annual cycle determined by the Executive Branch and the Congress. The finding concerning funding and planning is not clear, since migrant grantees have considerably more time to plan than other grantees because their services do not begin until the Spring months. (Ironically, on page 9 you include a comment from a grantee which complains of being given too much time to plan.) With respect to demographic data, we are funding a study which will improve our data on migrant children. However, it should be noted that all Head Start grantees are responsible for obtaining demographic data for their particular service areas. National data are important to provide a framework for assessing the unmet need for Migrant Head Start services, but no outside, broad survey will substitute for local data collected by grantees.
- On pages 9 and 10, the discussion of facilities is lacking in context and misleading. The purchase of facilities by migrant grantees would, in most instances, be inconsistent with the nature and aim of the Migrant Head Start program. Migrant streams change due to changes in weather, growing areas, crops and urbanization patterns. Furthermore, the use of

portable modulars has been well supported by the Migrant Branch. Since October 1991, the purchase of approximately 20 portables has been approved.

- On page 12, the discussion of monitoring teams also lacks context and contains unsupported statements. For example, the report states that "A majority of the six grantees expressed frustration and anger with OSPRI teams who they believed were unfair, biased, or 'out to find something.'" Monitoring is done to measure a grantee's compliance with the Performance Standards and other applicable policies and to find if the grantee is meeting the Performance Standards and properly administering the program. It is also not true that members of monitoring teams lack knowledge about the Performance Standards or do not understand the challenges of serving migrants. Virtually all members of monitoring teams are qualified staff from other migrant programs, chosen for their knowledge of and experience in migrant Head Start. In addition, the Branch has developed and distributed to programs a manual governing the compliance reviews, and has carefully trained selected peer reviewers.
- The points made about the timing of the PIR (page 12) are valid, and the Head Start Bureau has stated in this year's work plan its intention to solve this problem by adjusting the reporting dates for migrant program data.
- With regard to the recommendations, we note that the migrant program will be reviewed as part of the overall review of the Head Start program ordered by the Secretary.

Thank you again for the opportunity to comment on this draft report. If you have any questions on this memorandum, please contact Joseph Mottola on 205-8347.