

Department of Health and Human Services
**OFFICE OF
INSPECTOR GENERAL**

HEAD START SELF-ASSESSMENT



Richard P. Kusserow
INSPECTOR GENERAL

FEBRUARY 1991

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OEI-04-89-00790

EXECUTIVE SUMMARY

PURPOSE

This inspection was conducted to examine self-assessment in the Head Start Program. It describes the process and analyzes the utility of self-assessment to grantees and to the staff of the Administration for Children Youth and Families (ACYF).

BACKGROUND

Head Start Program

Head Start is a comprehensive, pre-school child development program designed to serve low-income children, handicapped children and their families. The program is based on the premises that all children share certain social and cognitive development needs and that low-income children can especially benefit from a developmental program addressing those needs.

Head Start is administered by the ACYF within the Office of Human Development Services (OHDS). In Fiscal Year 1988, the program served 446,523 children in 1,910 local projects throughout the country, with a Federal expenditure of \$1.2 billion.

Self-Assessment

Title 45, Part 1304 of the Code of Federal Regulations requires every Head Start grantee to conduct an annual self-assessment of its program. These regulations give the Policy Council responsibility for conducting the self-assessment. However, the regulations do not provide guidance on how self-assessment should be done. Grantees are allowed to self-assess in any manner they choose.

The ACYF has not developed criteria for judging the quality of a self-assessment. Many grantees, though, have made judgments about the effectiveness and worth of self-assessment practices.

FINDINGS

This inspection found:

- Virtually all grantees are conducting self-assessment annually, as required.
- Nearly all grantees (90%) use the Self Assessment Validation Instrument (SAVI) for conducting self assessment. However, many have concerns about its length, complexity and comprehensiveness.
- Policy Councils are involved in the self-assessment process in a variety of ways, including design, data collection, analysis and oversight.
- Every self-assessment requires a significant commitment of staff and volunteer resources.
- Grantees use self-assessment for a variety of purposes, including determining compliance with program performance standards, improving programs, garnering additional resources, enhancing public relations and training team members.
- The ACYF uses self-assessment findings in its review of grantees' major refunding applications every third year, and as a basis for on-site monitoring of grantees.

The self-assessment process would benefit from:

- being scheduled later in the program year to allow for more training;
- improved training by ACYF and the local grantee; and,
- improved communication/feedback between ACYF and the grantee, and within the grantee self-assessment team.

RECOMMENDATIONS

The ACYF should:

1. Improve the Self-Assessment/Validation Instrument (SAVI) which grantees use for conducting self-assessment.
 - a. Eliminate the redundancy in the instrument to make it simpler and less time-consuming.
 - b. Simplify the terms used in the instrument in order to make it more appropriate for parents and other team members not familiar with Head Start terminology.

- c. Update the instrument to keep it current with changes in the program, for example by adding transportation and handicapped sections.
2. Provide feedback and technical assistance which grantees find useful when they voluntarily submit their self-assessment findings.
3. Develop and provide training and technical assistance to grantees on how to improve self-assessment.

Grantees should:

1. Provide feedback to self-assessment team members and all staff on the findings and actions resulting from self-assessment so that they can better understand the process.
2. Train team members thoroughly so that each fully understands his/her component and responsibility in the self-assessment process.

COMMENTS ON THE DRAFT REPORT

The comments from the Assistant Secretary for Human Development Services on the draft report were supportive of the findings and the recommendations. However, OHDS did not agree with an OIG recommendation in the draft report that grantees be required to conduct self-assessments no earlier than March. We have deleted that recommendation from the final report.

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INTRODUCTION

PURPOSE

This inspection was conducted to examine self-assessment in the Head Start Program. It describes the process and analyzes the utility of self-assessment to grantees and to the staff of the Administration for Children Youth and Families (ACYF).

BACKGROUND

Head Start Program

Head Start is a comprehensive, pre-school child development program designed to serve low-income children, handicapped children and their families. The program is based on the premises that all children share certain social and cognitive development needs and that low-income children can especially benefit from a developmental program addressing those needs.

Head Start is administered by the ACYF within the Office of Human Development Services (OHDS). Most projects are funded and monitored by the regional ACYF offices. Head Start is the only child development program that is largely Federally funded. In Fiscal Year 1988, the program served 446,523 children in 1,910 local projects throughout the country, with a Federal expenditure of \$1.2 billion.

Head Start is also unusual in that it is one of the few large programs of the Department of Health and Human Services funded directly to local grantees. Grantees include local general purpose governments, school boards, community action agencies and single purpose non-profit organizations. Grantees are required to contribute a non-federal share to their local projects, of at least 20 percent of the total operating amount.

A grantee may operate the entire local project or delegate the operation of all or part of it to other suitable entities called delegate agencies.

There are four component areas for all Head Start programs: education, health, social services and parent involvement. Head Start provides a wide variety of services across these component areas.

Part of the local grant is designated for training. Each local project has access to a Regional Resource Center (RRC), a contractor which is responsible for providing training on all Head Start components except health.

Expectations for grantee performance are detailed in the Head Start performance standards for each component area. This careful blueprint is said by respondents at all levels to have contributed to the program's success since its inception in 1965.

Policy Council

Each grantee has a Policy Council (called the Policy Committee in delegate agencies). The Policy Council is a group comprised of parents of currently enrolled Head Start children and representatives of the community. No more than 50 percent of the Council's members may be community representatives.

The Policy Council exercises approval and disapproval functions over the grantee's operations. The Policy Council reviews and votes on such personnel actions as promotions, hiring and firing. It also approves grant applications, major purchases and proposed changes in program operations. The Policy Council is one of the primary vehicles for promoting parent involvement in the local program.

Self-Assessment

Title 45, Part 1304 of the Code of Federal Regulations requires every Head Start grantee to conduct an annual self-assessment of its program. Head Start is one of the few Federal grant programs that requires such a sophisticated self-examination.

The regulations give the Policy Council responsibility for conducting the self-assessment. However, the regulations do not provide guidance on how the self-assessment should be done. Grantees are allowed to self-assess in any manner they choose as long as all component areas are covered.

The ACYF has not developed criteria for judging the quality of a self-assessment. Many grantees, though, have made judgments about the effectiveness and worth of self-assessment practices. Grantee staff shared these judgments with inspection team members. The characteristics which distinguish outstanding self-assessments are said to include:

- a high degree of commitment by local Head Start project management to the process of self-assessment;
- the total involvement of the Policy Council in conducting the activity;
- intensive training for self-assessment team members;
- open communication providing all team members the opportunity to express their opinions and ideas;

- feedback to all team members on findings and corrective actions; and
- a formal, written corrective action plan outlining the steps needed to bring the Head Start project into compliance with performance standards.

Program Monitoring

Current ACYF policy calls for an on-site monitoring visit by ACYF staff every three years prior to submission of the major refunding application.

The ACYF has developed a Self-Assessment/Validation Instrument (SAVI). The grantees may use the instrument to conduct self-assessment. The ACYF staff use this document to validate grantees' self-assessment findings. The SAVI details the performance standards and is acknowledged by respondents at all levels to be rigorous and comprehensive. There is also a SAVI for Administration.

METHODS

Information for this inspection was gathered through discussions with Head Start grantee staff, parents and community representatives. Discussions were also held with staff of ACYF and the Regional Resource Centers. Additional information came from review of Head Start regulations and other program documents pertinent to self-assessment. Appendix A provides more detailed information regarding the methods used for this inspection.

FINDINGS

VIRTUALLY ALL HEAD START GRANTEES ARE CONDUCTING SELF-ASSESSMENTS

Policy Council Involvement

Although Policy Councils are involved in the self-assessment process, the nature of their involvement varies from program to program. Policy Council activities include planning and directing the self-assessment, collecting and analyzing data, reviewing findings and corrective action plans and implementing corrective action plans. Respondents report that the greater the involvement of Policy Council members in the self-assessment process, the better the process works.

Use of SAVI

Nearly all grantees (90%) use the SAVI for conducting the self-assessment. Use of the SAVI helps to organize data collection in all program areas and anticipates the ACYF staff validation.

Despite its widespread use, the SAVI does cause problems for many team members. Respondents in 35 of the programs which use it question the suitability of the SAVI for conducting the self-assessment. They are most concerned that the instrument is too complex and that parents find it hard to use. The Program Performance Standards SAVI is 81 pages. It requires that evaluation be done on such multi-faceted criteria as:

“Does the parent involvement program adequately provide methods and opportunities for enhancing parents’ ’parenting’ skills such as:

Experiences and activities which lead to enhancing the development of their skills, self-confidence, and sense of independence in fostering an environment in which their children can develop to their full potential....”

Most grantees (86%) have suggestions for modifying the SAVI to improve its utility in self-assessment. Many propose simplifying the abstract and technical terms in the document so that it is more understandable to parents who serve as self-assessment team members.

Others suggest eliminating redundancies throughout the instrument. Many of the redundancies result from the interrelated nature of the components of the Head Start Program. For example, parent education, an important facet of Head Start, is addressed in the education, health and social services components of the SAVI. There is, further, a parent involvement component which covers these same parent education issues. Many grantees suggested that for self-assessment, once would be enough.

Some respondents suggest that sections on transportation and services to handicapped children be added to make the instrument more complete. While a SAVI instrument for the handicapped does exist in some regions, this inspection found that many grantees were either unaware of it or not using it.

Several grantees have adapted SAVI to their own programs, for example, by simplifying it into a short checklist. Some grantees use a short checklist for two years and then use the more comprehensive SAVI in the third year to prepare for the major refunding application.

Commitment of Resources

Self-assessment represents a major commitment of resources among Head Start grantees. These resources include:

- staff time developing and delivering training to self-assessment team members.
- time spent by grantee personnel, Policy Council members and community volunteers receiving training and actually performing the self-assessment.
- time devoted by team members and Head Start managers and staff developing and implementing solutions to problems uncovered by self-assessment.

At Head Start grantee and delegate agencies, the size of the resource commitment depends on the number of persons involved in the self-assessment. These numbers correlate roughly with the size of the Head Start project. Since self-assessments typically examine at least one component in each Head Start center, large grantees (with many centers) require much larger teams. One grantee included in this inspection described a self-assessment team of 64 members.

Teams are made up of Policy Council members, grantee staff, parents and persons from outside the program. Respondents report that a diversity of well-qualified people improves the quality of self-assessment.

Training for Self-Assessments

Training is such an important part of the resources being committed to Head Start that it deserves specific attention. One-half of Head Start Directors report never having received formal training in conduct of self-assessment. Most of those who have received instruction were trained six or more years ago. Directors report that this lack of training in self-assessment is a major detriment to the activity.

Although many respondents report that they are unaware of available training, all of the RRCs contacted can provide self-assessment training. The RRCs report that this training is not often requested by grantees. Since RRCs usually organize training for clusters of grantees rather than

individual grantees, it is unlikely that the RRC will provide self-assessment training unless interest is widespread.

Grantees train their assessment teams prior to each annual self-assessment. Training is usually organized around program components and conducted by component coordinators or the Head Start Director. Typically, self-assessment training ranges from two hours to one-half day.

Given the comprehensiveness of the widely-used SAVI, ACYF respondents question whether such short periods of training are adequate. Parents, too, report that they have difficulty with aspects of the SAVI that require specialized educational background. In fact, there are elements in each component of Head Start which require special knowledge. Judgments on “foods which broaden the child’s food experience” or the existence of an “organized health education program” would be difficult without such knowledge.

Some Head Start grantees with particularly successful self-assessments train team members at each Policy Council meeting starting in September, the beginning of the Head Start school year. By the time of the self-assessment in March or April, the parents on the team have received up to thirty-six hours of training. In order to allow sufficient time to prepare, at least one regional office now requires that grantees schedule self-assessments no sooner than March.

GRANTEES REPORT THAT SELF-ASSESSMENT IS USEFUL

All grantees contacted in this inspection report some positive outcomes from self-assessment. Head Start Directors, component coordinators and parents are particularly positive in their reports. Community professionals are also enthusiastic about their participation. On the other hand, first line program staff, for example teachers and aides, tend to question the value of the self-assessment process which they say consumes too much time for the benefits gained. Often these staff are involved only in the training and data collection phases of the activity and are not familiar with outcomes.

Head Start grantees use the self-assessment process and the findings in five ways:

- identifying and correcting areas out of compliance with Head Start performance standards,
- improving program areas which are in compliance,
- garnering additional resources for the project,
- educating self-assessment team members about the Head Start program, and
- enhancing the project’s public relations.

Identifying and Correcting Areas Out Of Compliance

Nearly all grantees (91%) consider any negative self-assessment finding to be non-compliance with performance standards. If the self-assessment contains no negative findings, grantees consider themselves to be in compliance. Once non-compliance is determined, the Head Start Director or her/his designee develops a corrective action plan to address the areas out of compliance.

Usually the corrective action plan is written and specifies actions to be taken within specific time frames. In some cases, the plan is not written, but an informal agreement is made by the Head Start Director and staff to take certain corrective actions. A formal, written corrective action plan is reported by many respondents to be superior in that it provides a common basis of understanding for all those involved. In many projects, the Policy Council may also vote to approve the corrective action plan.

Most grantees (70%) treat self-assessment findings of non-compliance as an internal matter. These findings are not regularly reported to the regional ACYF office.

In two instances, however, self-assessment findings *are* routinely reported to ACYF:

- The findings of the most recent self-assessment are included in the major refunding application.
- Where corrective actions require substantial new resources, grantees may use self-assessment findings to justify requests for supplemental funding.

Head Start Directors report that non-compliance uncovered through the self-assessment is seldom a serious problem; the shortcomings identified are usually small and easily corrected. Nor are grantees concerned that ACYF will become aware of their non-compliance findings, as there is little likelihood of a monitoring visit.

Improving the Program

Self-assessment results in two types of modification to Head Start projects. Most of the modifications mentioned in the corrective actions plans bring the project into compliance with a Head Start requirement. For example, if the self-assessment discovers a stairway accessible to the children, the center director may install a gate to bar access.

However, every improvement does not address non-compliance. Other self-assessment follow-up actions improve operations which were already in compliance. For example, the assessment team may discover and report on an effective teaching technique or an unusually good set of materials in one center which could be adopted by other centers in the project. Respondents cite innovative ideas from parents as the most rewarding of these modifications, because they demonstrate parent involvement in improving their children's Head Start program.

Garnering Additional Resources

Grantees use the self-assessment process in two ways to increase their resources. First they use self-assessment findings to justify requests to ACYF for additional funding. Often these requests represent one-time capital expenditures to improve facilities or to purchase major equipment that the self-assessment shows is needed.

The second type of increased resources comes from the expanded "Head Start family." Many grantees report that they have received additional cash, in-kind contributions and *pro bono* services as a result of the involvement of community leaders in self-assessment and their "buy-in" to the Head Start philosophy. Such benefits as expanded health screenings, newly donated facilities and improved access to local social services were mentioned.

Educating Self-Assessment Team Members

All grantees use the self-assessment activity as a vehicle for educating team members about the Head Start Program. Much of the *staff* training is cross-component training. A staff member who works in one area will become familiar with and assess another. Normally staff members assess centers other than those in which they work. Assessing other component areas and other centers tends to broaden staff understanding of Head Start.

Parents are usually trained to perform self-assessment in one component area. Such training increases their understanding of how their children benefit from that component. Many grantees cite this training as one of their most effective activities with parents. Yet 58% of the projects train parents for less than four hours. This minimal training greatly diminishes the potential benefit parents can bring to self-assessment, as well as the value that they can receive from it.

Enhancing Public Relations

Grantees use self-assessment findings to promote the Head Start program in their communities. Some Head Start grantees use a number of community professionals on their assessment teams. In this way they familiarize outsiders with the Head Start program. Respondents who have successfully used this approach say that Head Start sells itself.

By involving qualified professionals from outside the Head Start program, grantees are able to extend the "Head Start family" in the community. The local project can be enhanced as these professionals share new skills and ideas. However, most grantees fail to utilize these generally available community resources.

ACYF CAN IMPROVE SELF-ASSESSMENT

Better Using Self-Assessment Results

The ACYF staff use self-assessment reports as the basis for monitoring grantee performance. The ACYF policy calls for one in-depth monitoring visit every three years. The monitoring procedure uses the SAVI to validate grantee self-assessments. In past years, the monitoring visit involved several people reviewing the program for several days. Presently, due to limited travel funds in ACYF, a typical monitoring visit is more likely to be conducted by one Child Development Program Specialist (CDPS) for one day or less.

ACYF staff also use self-assessment results by requiring that the most recent findings be included in the major refunding package which grantees submit every three years. The findings are evaluated along with other information contained in the application; however, grantees rarely get any feedback specifically on self-assessment findings. Most respondents report that specific feedback would be helpful in many cases to assist them in resolving problems.

Improving the Self-Assessment Process

When ACYF staff receive self-assessment findings independent of the refunding application, they may or may not respond with useful feedback to the grantee. Some of the grantees do send at least summary information to their CDPSs in the ACYF regional offices. Other grantees report having done so in the past.

In a few cases, the CDPSs make a significant effort to respond to self-assessment information from the grantees. They suggest ways to remedy shortcomings that may have been discovered by other grantees. Grantees who receive this constructive type of feedback report that it adds substantially to the value of self-assessment.

In most cases, however, grantees get no feedback from regional program staff on the findings which they voluntarily submit. ACYF has an opportunity to improve Head Start projects by increasing the quantity and quality of the feedback to grantees on self-assessment findings.

A well-done self-assessment provides a very important framework for an abbreviated monitoring visit. However, respondents from both ACYF and the grantees question the effectiveness of the current monitoring practices. They agree that these visits are too brief and infrequent to be helpful, either to the grantee or to ACYF. ACYF has an opportunity to improve its process for monitoring grantees, including the attention given to validating the self-assessment.

There is a limit to the resources that a grantee can devote to self-assessment. ACYF can help by improving training packages, updating the SAVI and providing a mechanism for grantees to share successful experiences.

CONCLUSIONS

Head Start grantees are performing self-assessments as required. Each year, the process of self-assessment consumes considerable grantee time and effort. All grantees report that self-assessment is valuable. The grantees use the activity and the findings in a variety of ways which strengthen their programs.

The ACYF uses the self-assessment findings for monitoring grantee performance and evaluating the major refunding package. These uses make self-assessment valuable to ACYF.

Increased information and feedback on self-assessment are needed to improve the activity. With ACYF assistance, the benefits of self-assessment to grantees could be substantially increased.

RECOMMENDATIONS

The ACYF should:

1. Improve the SAVI instrument which grantees use for conducting self-assessment.
 - a. Eliminate the redundancy in the instrument to make it simpler and less time-consuming.
 - b. Simplify the terms used in the instrument in order to make it more appropriate for parents and other team members not familiar with Head Start terminology.
 - c. Update the instrument to keep it current with changes in the program, for example, by adding sections on transportation and services to the handicapped.
2. Provide feedback and technical assistance which grantees find useful when they voluntarily submit their self-assessment findings.
3. Develop and provide training and technical assistance to grantees on how to improve self-assessment.

Grantees should:

1. Provide feedback to self-assessment team members and all staff on the findings and actions resulting from the self-assessment so that they can better understand the process.
2. Train self-assessment team members thoroughly so that each fully understands his/her component and responsibility in the self-assessment process.

OIG RESPONSE TO OHDS COMMENTS

The comments from OHDS were in general agreement with most of the recommendations. However, OHDS did not concur with a recommendation in the draft report that grantees be required to conduct self-assessments no earlier than March, due to the wide range of differences in the individual schedules of grantees. While we believe that in general it would be more beneficial to conduct the self-assessment late in the program year, we acknowledge the OHDS concern that such a requirement would be overly prescriptive and might not allow grantees to follow a schedule more suitable to their own individual needs. We have deleted that recommendation from the final report.

Although OHDS concurred with the recommendation that the SAVI be modified to make it more “user friendly” and to include sections on the handicapped and transportation, OHDS indicated that the SAVI would be difficult to change because it is so closely tied to the Head Start regulations. OHDS further indicated that the Head Start On-Site Program Review Instrument (OSPRI), which is now being used for monitoring by OHDS regional offices, is designed to be more “user friendly” and has a section on children with disabilities. However, it does not address the transportation issue.

As a follow-up to their formal response to the draft report, OHDS staff met with the OIG and provided an overview of an action plan that would more fully address the report recommendations. According to this action plan, which will be submitted in greater detail to the OIG within 60 days, OHDS will provide the results of this OIG inspection to all grantees and regional offices. In addition, since the OSPRI is now being utilized for regional office monitoring, grantees will be encouraged, but not required, to replace the SAVI with the OSPRI. Grantees will also be encouraged to include transportation in the self-assessment; the scope and focus of the transportation review will be determined by each grantee. Within the next year OHDS plans to establish a task force to address transportation. One of the agenda items will be how best to formally incorporate this issue into the self-assessment process. Finally, the OHDS action plan will identify a policy or procedure that will enable regional office staff to provide feedback to grantees on self-assessment results that are voluntarily submitted.

We have included the comments from the Assistant Secretary as well as the technical comments and clarifications from OHDS at Appendix B.

APPENDIX A

DETAILED DESCRIPTION OF METHODS

Very little information exists on self-assessment despite the fact that self-assessments are performed annually by all grantees. The Head Start regulations mention self-assessment one time. No guidance has been developed by ACYF to clarify either how self-assessment should be done or what constitutes good quality self-assessment.

This inspection provided an opportunity, through a large number of discussions with people involved in self-assessment, to determine what grantees believe to be the most important aspects of self-assessment.

The inspection team conducted interviews with:

| | |
|-------------------------------------|-----|
| ACYF staff..... | 47 |
| Head Start grantee staff..... | 117 |
| Head Start parents | 40 |
| Community professionals | 33 |
| Regional Resource Center staff..... | 13 |
| TOTAL | 250 |

The inspection team interviewed respondents from all ten ACYF regions. Further, the grantee staff represented 58 grantees, including large and small grantees located in urban and rural settings.

Documents reviewed included:

- pertinent sections of the Code of Federal Regulations,
- Head Start Grant Application Package,
- Head Start Self-Assessment Validation Instruments (SAVI),
- regional and grantee-specific instructions on self-assessment, and
- training materials provided by Regional Resource Centers.

APPENDIX B

COMMENTS ON THE DRAFT REPORT

Immediately following are comments on the draft report from the Assistant Secretary for Human Development Services and technical comments from the Office of Human Development Services.



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Assistant Secretary
Washington DC 20201

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JUL 25 1990

TO: Richard P. Kusserow
Inspector General

FROM: Assistant Secretary for
Human Development Services

SUBJECT: Office of Inspector General Draft Report on "Head
Start Self-Assessment" (OEI-04-89-00790)

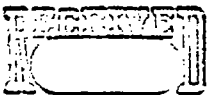
Attached are comments on the draft report by the Office of Inspector General (OIG) entitled "Head Start Self-Assessment."

In general, we support the findings of this report and believe that it fairly characterizes the state of self-assessment in Head Start programs. It contains good information to share with grantees regarding "best practice" self-assessment activities. Moreover, it shows that self-assessment can contribute to improving the quality of services provided by Head Start grantees.

We appreciate the opportunity to comment on this draft report.

Mary
Mary Sheila Gall

Attachment



| | |
|-----------|-------------------------------------|
| IG | <input checked="" type="checkbox"/> |
| PDIG | <input checked="" type="checkbox"/> |
| DIG-AS | <input type="checkbox"/> |
| DIG-EI | <input checked="" type="checkbox"/> |
| DIG-OI | <input type="checkbox"/> |
| AIG-MP | <input checked="" type="checkbox"/> |
| OGC/IG | <input checked="" type="checkbox"/> |
| EX SEC | <input checked="" type="checkbox"/> |
| DATE SENT | 7/25 |

JUL 27 1990

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COMMENTS OF THE OFFICE OF HUMAN DEVELOPMENT SERVICES ON THE
OFFICE OF INSPECTOR GENERAL'S REPORT, "HEAD START
SELF-ASSESSMENT," OEI-04-89-00790

General Comment

Pages i and 2 contain references to Title 45, Part 1304 of the Code of Federal Regulations (CFR) which state that every Head Start grantee is required to conduct an annual self-assessment. As a point of clarification, the only regulatory reference in Part 1304 is Appendix B, Chart B. It states that Head Start grantees and delegate agencies must "Conduct self-evaluation of (the) agency's Head Start program." The "operating responsibility" is assigned to the Head Start Policy Council or Committee. The reference to conducting an annual self-assessment is implied, since at least 50% of the membership of Policy Councils and Committees are parents of children currently enrolled in Head Start, and these groups change annually. The implication is that each Policy Council or Committee will then be involved in a self-assessment each year.

ACYF Recommendation #1

Improve the SAVI instrument which grantees use for conducting self-assessment.

- a. Eliminate the redundancy in the instrument to make it simpler and less time-consuming.
- b. Simplify the terms used in the instrument in order to make it more appropriate for parents and other team members not familiar with Head Start terminology.
- c. Update the instrument to keep it current with changes in the program, for example by adding transportation and handicapped sections.

OHDS Comment

We concur with the recommendation.

The Self-Assessment Validation Instrument (SAVI) is designed to assist Head Start programs in determining their compliance status with Head Start regulations, specifically 45 CFR Parts 1301, Head Start Grants Administration, and 1304, the Head Start Program Performance Standards. The organization of the SAVI reflects that of the regulations and redundancy is attributable

to the language and organization of the regulations. Part 1304, for example, is organized into four component areas. Although there is a separate component for Parent Involvement, the requirement to involve parents in all aspects of Head Start program operations is woven throughout all component areas and contributes to much of the redundancy.

The Head Start Bureau has taken some steps to simplify the instrument that is used by Federal staff to conduct on-site monitoring reviews. During fiscal year 1990, Federal staff began using a revised instrument entitled the On-Site Program Review Instrument (OSPRI). The OSPRI is organized to minimize the redundancy of some Head Start regulations. In addition, we have replaced the SAVI guidance with indicators for each regulation item to better assist the reviewer in determining that the grantee is meeting the intent of the regulation.

After one year of use, HDS Regional staff are generally pleased with the OSPRI, finding that the indicators make it an easier instrument to use. Some Regions have trained all grantees in the use of the OSPRI. Because the SAVI is not a required self-assessment instrument, many grantees have begun to use the OSPRI as it is the instrument Federal staff use for monitoring. Grantees are reporting that the OSPRI is easier than the SAVI for parents and staff to use.

We have not eliminated the SAVI as an option for self-assessment for grantees. In addition to instruments grantees develop on their own, the SAVI and the OSPRI will be available for grantees to use for self-assessment.

By fiscal year 1991, the Office of Human Development Services plans to review the OSPRI to assure that the content and format assist the reviewer in obtaining the information necessary to make a compliance determination. When we do this, we will consider adding areas that are not currently included. The OSPRI now has a brief section on services to children with disabilities. We are considering adding to this and will also consider adding other areas, such as transportation, to the OSPRI. There is not a SAVI related to services to children with disabilities or related to transportation because there are no regulations that address such services. Regulations covering services to children with disabilities are, however, in the process of being published.

ACYF Recommendation #2

Provide feedback and technical assistance which grantees find useful when they submit their self-assessment findings.

OHDS Comment

We concur with this recommendation.

Because of limited travel resources over the past several years, Federal monitoring of Head Start grantees declined, with monitoring frequently limited to problem grantees. Prior to this, Federal staff monitored all grantees through an in-depth team review at least once every three years. Self-assessment was part of a "monitoring system" generally occurring prior to the on-site review. The Federal team then validated the grantee's self-assessment findings during the review process. When the agency's capacity to conduct on-site reviews declined, the link between self-assessment and monitoring also declined.

During fiscal year 1990, Regional Offices monitored at least 25% of the grantees they fund, a much higher percentage than was achieved in the recent past. This trend is expected to continue with on-site monitoring increasingly receiving emphasis. We believe that increased monitoring will also increase the attention paid by Federal staff to grantee self-assessment results. While we currently have not defined a national system for monitoring or self-assessment, we expect to do so when the revised Head Start Grant Application Instructions become effective sometime during fiscal year 1991. These Instructions implement a three-year grant application cycle that will require grantees to submit a comprehensive grant application package once every three years. Monitoring and self-assessment are expected to be linked to this cycle but we have not defined that process at this time. The revised Instructions request that grantees submit information regarding the progress they have made in addressing self-assessment findings. This information will be submitted annually and will create an opportunity for more regular feedback to all grantees.

ACYF Recommendation #3

Develop and provide training and technical assistance to grantees on how to improve self-assessment.

OHDS Comment

We concur with this recommendation.

Head Start Resource Centers are designed to provide large, multi-grantee training activities in response to needs identified by grantees. We will advise the Resource Centers that self-assessment training should be an option for grantees

when conducting training needs assessments and that they should be prepared to provide training in this area. In addition, the Head Start Bureau is planning a Management Institute for key grantee staff during fiscal year 1991. Self-assessment is a topic that will be addressed during the Management Institute.

Grantee Recommendations

Grantees should:

1. Provide feedback to self-assessment team members and all staff on the findings and actions resulting from self-assessment so that they can better understand the process.
2. Train team members thoroughly so that each fully understands his/her component and responsibility in the self-assessment process.
3. Schedule the self-assessment for no earlier than March to allow for adequate training.

OHDS Comment

We concur that the first two recommendations are "best practice" activities that all grantees should address in their own self-assessment process. The third recommendation is affected by plans and schedules of the individual grantees. The self-assessment is a key activity in the early stages of a grantee's planning process. All grantees have different schedules to address. While the March to May time-frame is a logical and good one for many grantees, we are reluctant to require it for all grantees.