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Headed in the Wrong Direction: Why the House Head Start Bill (H.R. 2210) Is Unlikely to Make the Program Better

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Introduction

This year, Congress is scheduled to reauthorize Head Start, a federal-to-local grant program providing early childhood education and comprehensive services, including health, nutrition, parental involvement, social, and other services, to low-income preschool children and their families. On June 19th, the House Education and Workforce Committee passed H.R. 2210, the School Readiness Act of 2003, on a 27-20 party-line vote. According to its sponsors, the main goals of H.R. 2210 are to close the school readiness gap between young low-income children and other children upon entering school and to promote collaboration and alignment at the state level between Head Start and other early childhood education programs.

These goals are important. However, they are unlikely to be achieved under H.R. 2210. Several of the bill's provisions are positive, including the emphasis on teacher credentialing and the enhanced collaboration requirements. However, the bill also raises a set of serious concerns:

- The bill establishes a set of significant new goals for Head Start programs without providing the funding that would be needed to meet the goals;
- The bill reduces the federal commitment to training and technical assistance, a key part of any strategy to improving program quality;
- The bill would allow religious discrimination by faith-based providers receiving Head Start funds; and
- The bill would give eight states the option to receive Head Start funds in the form of a block grant without full application of the current Head Start Performance Standards, adequate accountability, or sufficient coordination requirements.

CLASP believes that H.R. 2210 should not be passed in its current form. We hope that during reauthorization, Congress will adopt provisions that will build on and improve the existing Head Start program. Congress should:

- Encourage collaboration and long-term strategic state-level planning among Head Start, education and child care programs to deliver services that help children succeed in school while meeting the work support needs of parents, and provide additional funding to help with these state planning activities;
- Improve the quality of Head Start programs through funded professional development programs for Head Start and other early childhood teachers; and
- Expand funding for Head Start and Early Head Start so that the above goals will be addressed while also expanding comprehensive services to more children ages birth to five.

H.R. 2210 contains two titles. Title I would make a set of changes generally applicable to Head Start programs around the country. Title II would give states the option to apply for Head Start funds to use for early childhood activities; up to eight states would be allowed to govern Head Start funds in the next five years. Each title presents raises different issues, so this piece is divided into two sections discussing major concerns with each.

Top Concerns with Title I of H.R. 2210

Title I contains some positive changes to the current Head Start Act, but would not authorize adequate funds to meet these new goals without shifting attention and funding away from other Head Start priorities or reducing the number of children served. Title I would also reduce the federal commitment to training and technical assistance. Finally, a provision in the bill would allow faith-based organizations operating Head Start programs to discriminate against individuals in employment decisions based on religious beliefs.

H.R. 2210 would not authorize sufficient funding to address key provisions, and the prospects of an adequate Head Start appropriations increase in Congress are dim. H.R. 2210 would authorize a \$202 million increase in funding for fiscal year 2004, and “such sums as necessary” for the next four years. However, both the House has passed and the Senate Appropriations Committees has approved a smaller increase of about \$148 million for FY 2004. CLASP estimates that most, if not all, of the \$148 million would be necessary in fiscal year 2004 to cover the cost of inflation, leaving very little if any additional funding for other priorities, including quality improvement and salary enhancement. Head Start programs may be forced to cut services or children in order to meet new requirements. This could make certain provisions of H.R. 2210 unworkable. For example:

- **Increasing Head Start teacher qualifications:** Title I would require that 50 percent of Head Start teachers have bachelor’s degrees in early childhood education or a related field by FY 2008. Within three years, all new Head Start teachers would have to have or be pursuing at least an associate’s degree. This is a laudable goal; current research suggests that teachers with four-year college degrees who have majored in early childhood education and development or a related field are associated with teaching practices more conducive to early learning.¹ However, to move the percentage of teachers meeting these qualifications from the 2002 level of 28 percent to 50 percent by 2008 is likely to take additional resources both to increase education levels of current teachers and to attract and retain teachers who have formal education qualifications equal to those of public school teachers. The average salary

for a Head Start teacher with a bachelor's degree in 2002 was \$25,090,² while the average kindergarten teacher salary was about \$43,000.³ It is unreasonable to expect that Head Start programs will be able to increase the proportion of teachers meeting higher formal education qualifications without addressing this salary differential. Researchers have estimated that just over \$2 billion over five years would be needed to phase in salary increases so that 50 percent of Head Start teachers had comparable salaries to public teachers by 2008. The approximated annual cost of paying competitive salaries to 50 percent of Head Start teachers would be about \$600 million (not accounting for inflation adjustments).⁴ In addition, Head Start programs would likely prefer helping their existing staff move toward achieving bachelor's degrees, rather than trying to replace a large number of teachers with new staff who meet these requirements—particularly in areas of the country where the proportion of Head Start teachers with formal education qualifications falls well below the national average and where staff with higher levels of education are difficult to find. Helping existing staff acquire bachelor's degrees would require new resources to cover the costs of tuition, fees, books, and substitute teacher salaries.

- **Expanding the capacity to coordinate Head Start with state education and early education policies:** H.R. 2210 would expand the requirements for existing federally funded Head Start-State Collaboration Offices, which now promote collaboration and coordination between Head Start programs and other programs that serve preschool children, to work with state agencies and to develop statewide plans to address school readiness and other key priorities. The bill includes a list of state agencies and programs with which the Head Start-State Collaboration Offices would need to partner, including state chief school officers. These are positive provisions. However, the bill does not provide any additional funding to help these federally funded offices conduct these planning processes or implement the results, which could result in additional mandates on state agencies without new resources.

Other new priorities of H.R. 2210 would also be difficult to achieve without increased funding. The Head Start Act requires that each year any new funding above prior year appropriations must first be applied to hold the baseline number of children served “harmless,” with any funds left over applied to other priorities, including a set-aside for quality improvement and teacher salary enhancement. The House bill would increase the amount of the current set-aside of new leftover funding to 60 percent, but the amount that would be available for that set-aside would be minimal unless appropriators go well above the currently proposed \$148 million increase for FY 2004. This means that Head Start programs will have to either cut back on the number of children they serve or on the quality of services they provide to the children they are serving in order to reprioritize the use of funds to reach the teacher qualifications goal in the bill. Head Start is currently serving only 60 percent of eligible children, and the Early Head Start program reaches less than 5 percent of eligible infants and toddlers.

H.R. 2210 would reduce the minimum amount of Head Start funds that must be set-aside for training and technical assistance purposes. Current law states that the Secretary of Health and Human Services must reserve no less than 2 percent of the Head Start appropriation for training and technical assistance to improve the quality of programs. The bill would change this provision from the floor of 2 percent per fiscal year to no less than 1 percent and no higher than 2

percent. Given that one of the key priorities of the bill's sponsors is to raise the quality of Head Start programs, it does not seem to make sense to lower the amount of funding available for the training and technical assistance that could help achieve this purpose.

H.R. 2210 would allow faith-based programs receiving Head Start funds to discriminate in employment based on religion. The bill would add language that exempts religious corporations, associations, and educational institutions or societies receiving Head Start funds from compliance with the non-discrimination provisions of the Head Start Act with respect to the employment of individuals of a particular religion to perform work connected with the carrying on by such corporation, association, educational institution or society of its activities. If adopted, this provision could result in the dismissal or denial of opportunities to teachers solely because of their religion. Faith-based organizations are an important part of the Head Start program; their participation should be encouraged without allowing them to discriminate.

Top Concerns with Title II of H.R. 2210

Title II would allow the Secretary of Health and Human Services to award federal Head Start funds to eight states to operate state or local area early childhood demonstration programs. Only a specified few of the provisions of the Head Start Act, as amended by Title I, would apply to these demonstrations.

The sponsors of H.R. 2210 assert that selected states with a proven commitment to early childhood education should be given the ability to control Head Start funds to promote school readiness for low-income children as well as program collaboration. The promotion of school readiness and program coordination are important goals. However, devolving responsibility for the Head Start program to states without the application of the Head Start performance standards or adequate accountability is not an effective way to pursue these goals. To the contrary, it could result in significant curtailment of comprehensive services in the eight demonstration states. Additionally, if Title II becomes law, this demonstration program model could be seen as a signal of Head Start's future for all states—a change from a comprehensive focus on early childhood and development to a more limited definition of what counts as school readiness.

In addition, CLASP has three specific concerns about Title II. First, Title II does not require that state demonstration programs follow the federal Head Start Program Performance Standards that currently govern the nature, quality, and intensity of services provided to low-income children and families. Second, Title II does not contain adequate accountability to ensure that states are using Head Start funds appropriately and are, in fact, providing better comprehensive educational services to children and families than are currently provided under the federal Head Start program. Third, despite the stated goal of promoting collaboration and coordination among Head Start and other early childhood programs, the collaboration requirements of Title II are less stringent than those contained in the current Head Start Act, as amended by Title I.

Title II would not require state demonstration programs to meet the Head Start performance standards. The federal Head Start performance standards govern the range, quality, and intensity of Head Start's comprehensive educational, health, nutrition, family

support, parental involvement, and other services. These performance standards require timely health screenings and follow-up; nutrition services; comprehensive assessments, evaluations, and services for children with disabilities in collaboration with the agencies administering the early childhood programs of the Individuals with Disabilities Education Act; and the involvement of parents in their children's programs through requirements that parents volunteer in the operation of programs and participate in program decision-making. For example:⁵

- *Children entering Head Start must be screened for developmental, sensory, and behavioral concerns within 45 calendar days of enrollment. In 2002, 86 percent of Head Start children received medical screenings and 78 percent received dental exams. Providing comprehensive health screenings to children at an early age is very important because, the sooner that health challenges are identified, the greater the likelihood they can be addressed before they negatively impact school readiness and performance.*
- *Programs must work with parents to arrange for any needed follow-up health or developmental diagnostic testing or examinations, as well as any necessary treatment or immunization for children. In 2002, 24 percent of Head Start children screened for medical problems were assessed as needing treatment, and 89 percent of those children received treatment. Head Start programs are currently required to follow up with families to ensure that children receive the health services they need. Sometimes language, transportation, or other barriers can interfere with children getting needed health examinations or treatment. Head Start staff work with families to address these barriers so that children receive the services they need.*
- *Each Head Start program must stay open to parents at any time during operation, must involve parents in the development of program curricula, and must provide parents opportunities to volunteer or become staff. Head Start programs must work to involve parents in their children's education through volunteering and participation in curriculum development. Staff must work with parents to develop family partnership agreements that identify goals, responsibilities, and timetables and strategies for achieving these goals. In 2002, 81 percent of Head Start families had developed family partnership agreements. Performance standards require that teachers in center-based programs must offer to conduct at least two home visits (at times convenient for the parent) and two parent-teacher conferences per program year.*

Demonstration states would not be required to meet the Head Start Program Performance Standards. Instead:

- The bill would require demonstration states to provide services described in Section 641A of the Head Start Act "at least as extensive as were provided" to the *same number* of children that were served by Head Start in FY 2003. It is unclear what services would be required by this language or how it would be determined whether the services were "at least as extensive" as were provided in the FY 2003. However, this language clearly does not require the Secretary to ensure that demonstration states meet the Head Start Program Performance Standards.

- Fewer requirements would apply to services for any children *above* the base number of children. For these additional children, there would be no requirement to provide services as extensive as were provided in the base year. Instead, states would be required to provide services to address child development and education, parent education and involvement, and social and family support services; however, there are few explicit requirements for these services.
- In their state plans, demonstration states would be required to describe the health, parental involvement, nutritional, social, transition to kindergarten, education, and other services they are providing. Again, the Head Start Program Performance Standards are not referenced, and there is little guidance offered about the content, quality, or intensity of these services.
- In selecting demonstration states, the Secretary would be required to “consider” whether states applying for demonstration programs have standards that “generally” meet or exceed Head Start Program Performance Standards. The Secretary need only “consider” whether applying states meet such standards, and even this consideration is limited to whether or not states “generally” meet or exceed standards.

Absent a requirement to apply Head Start Program Performance Standards, it is doubtful that most states would do so. A review of state prekindergarten program policies found that only three states (Delaware, Oregon, and Washington) provide the same range of comprehensive services as required in Head Start.⁶

There will be even more disincentives against states providing comprehensive services in future years. First, states face pressure to ensure that children are prepared for the third grade assessments required by the No Child Left Behind Act (NCLB). This pressure could encourage states to provide narrowly-focused education services and to set their early education standards and goals so as to ensure only good performance on these assessments.

Second, the current fiscal environment will make it difficult for states to provide comprehensive early education services that meet or exceed Head Start standards. In the last quarter of FY 2003, states had to close \$21.5 billion in budget shortfalls, and 21 states are already considering cuts to their K-12 public school programs, not to mention the states considering cuts to Medicaid, child care, and other services that support low-income families.⁷ A recent General Accounting Office study found that, since January 2001, 23 states have reduced the availability of child care subsidies to low-income families; 11 states told the GAO that they were considering such reductions for FY 2004.⁸

Thus, Title II would offer participating states the ability to curtail Head Start’s comprehensive service approach at the same time that states are facing enormous fiscal pressures to reduce the scope and nature of services provided.

The accountability provisions of Title II are inadequate. Title II would not ensure that the states chosen have a commitment to maintaining Head Start’s high level of services and would

not provide for adequate ongoing monitoring and accountability for state expenditures, participation, and results. Instead, the degree of monitoring and enforcement of Title II's requirements, as well as the decision to release most state-reported data to the public would largely be within the Secretary's discretion.

- *State selection process:* It appears that a state could obtain approval for a demonstration without meeting Title II's specified eligibility criteria. Under Title II, eight states could receive state demonstration program funds if they met four eligibility criteriaⁱ and submitted an application in compliance with Title II. While the bill's selection criteria would seem to restrict the number of potentially eligible states, another provision of the bill says that a state application will be deemed approved unless the Secretary acts on the application within a reasonable period of time. Therefore, on the one hand, the bill sets out a list of seemingly stringent criteria for eligibility to qualify for demonstration funding. On the other hand, inaction by the Secretary would result in an application being automatically approved, seemingly regardless of whether or not these criteria are met.

Ongoing monitoring and accountability: The bill's evaluation language was significantly strengthened after concerns were raised that the bill initially filed provided no funding or time frame for evaluation. However, even with the stronger evaluation language, the bill's overall accountability structure is still seriously inadequate, leaving enforcement of Title II's requirements largely to the discretion of the Secretary. For example, the bill establishes a maintenance of effort requirement that states must maintain their spending for child care for preschool children and other preschool programs in a specified base year. However, the bill would not require states to submit the data (including their base levels of spending) that would be necessary to determine their compliance with the maintenance of effort requirement. Instead, they would only be required to make a commitment to provide data "at such times in such format as the Secretary requires," concerning non-federal expenditures and numbers of children and families served in preschool and Head Start programs. Thus, any enforcement of the maintenance of effort provision would be largely left to the discretion of the Secretary. In addition, the bill contains no requirement that these data be released to the public by the state or the Secretary.

ⁱ The eligibility criteria are:

- (A) The state has an existing state supported system providing public prekindergarten services to children prior to entry into kindergarten;
- (B) The state must have implemented standards for school readiness that include standards for language, prereading, and premathematics development for prekindergarten that are aligned with state K-12 academic content standards and that will apply to all programs receiving funds "under this part;" or the state must provide an assurance that such standards will be aligned by the end of the second fiscal year of participation;
- (C) State and locally appropriated funds for prekindergarten programs and Head Start in the fiscal year before applying for the program must be not less than 50 percent of federal funds that grantees in the state received under Head Start in the prior fiscal year; and
- (D) The state has established a means for inter-agency coordination and collaboration in the development of its state plan.

Second, a demonstration state would have to describe in its state plan a range of key features, such as quality standards, an accountability system, teacher qualifications, state guidelines for school readiness, and a plan for professional development. However, nothing in the bill would require a state to comply with its state plan. And while the bill directs the Secretary to take action if a state substantially fails to meet the requirements of the law, it does not state that failure to comply with a state plan constitutes a failure to meet the requirements of the law.

Although promoted as a vehicle for improving collaboration and coordination among early childhood programs, Title II requires less coordination and collaboration than the current Head Start Act, as amended by Title I. Current law has a set of collaboration requirements that would be strengthened by Title I of H.R. 2210, but these requirements would not apply to demonstration projects under Title II. Under the amended bill, in non-demonstration states, the state Head Start Collaboration Offices would be required to ensure that Head Start services are collaborating with “health care, welfare, child care, education, and community services activities, family literacy services, activities relating to children with disabilities, and services to homeless children.” At the local level, Head Start grantees would be required to collaborate and coordinate their activities with the state Child Care and Development Block Grant (CCDBG) agency, early childhood education and development programs (including Even Start), the Individuals with Disabilities Education Act programs, and homeless services programs. The Secretary would be required to award collaboration grants to states to fund their state-level collaborative activities.

These collaboration requirements would not apply to demonstration programs under Title II. Title II contains a list of mandatory and optional collaboration partners for Head Start-funded state demonstration programs; the full list of collaboration requirements described above would apply only to non-demonstration states. The list of mandatory partners in Title II only includes early education programs, such as Early Reading First, Even Start, other Title I-funded pre-school programs in the state and the Ready-to-Learn Television Program funded under Title II of the Elementary and Secondary Education Act. The list of optional partners includes the CCDBG agency. The agencies administering the IDEA early childhood programs are not specified at all. Furthermore, while a state’s overall demonstration grant would include the funds that non-demonstration states receive for collaboration activities, there would be no requirement that a demonstration state use the funds for such activities. Title II would require that a demonstration state provide assurances that its plan was developed through timely and meaningful collaboration with multiple entities; however, there is no requirement for continued collaboration after the plan is submitted.

Thus, demonstration states would have fewer collaboration requirements than non-demonstration states, and the requirements that would exist focus narrowly on state programs that provide educational services. This deemphasizes the importance of providing full-day, full-year services that allow children to receive comprehensive educational services while their parents work, thus meeting both the work support needs of parents and the developmental needs of children. Furthermore, it deemphasizes the importance of collaborations between Head Start and IDEA to ensure that the full range of needs of children with disabilities are addressed.

Conclusion and Recommendations

H.R. 2210 is unlikely to improve Head Start and succeed in increasing school readiness for poor children and the coordination of all early childhood programs. Title I of the bill would set ambitious goals for teacher education and other priorities, but does not provide the funding necessary to meet them. Demonstration states under Title II would not be required to follow the Head Start Program Performance Standards that are crucial to ensuring that low-income children and families continue to receive comprehensive educational and support services. In both titles, the emphasis on certain aspects of school readiness, coupled with lack of new funding, could undercut the ability of programs and states to address the multi-faceted needs of poor children and their families.

Head Start has long recognized that to promote school readiness for poor children, a set of comprehensive services, including health, nutrition, social, parental involvement, and other family support services, are needed. Rather than building on the success of Head Start to improve school readiness, coordination, and support, H.R. 2210 may make it more difficult for Head Start programs to continue to address the full range of needs presented by preschool children growing up in poverty.

H.R. 2210 should not be passed in its current form. Instead, Congress should consider legislation that would:

- Encourage collaboration and long-term strategic state-level planning among Head Start, education and child care programs to deliver services that help children succeed in school while meeting the work support needs of parents, and offer additional funding to help with these state planning activities;
- Improve the quality of Head Start programs through funded professional development programs for Head Start and other early childhood teachers; and
- Expand funding for Head Start and Early Head Start so that the above goals will be addressed while also expanding comprehensive services to more children ages birth to five.

¹ Bowman, B.T., Donovan, M.S., & Burns, M.S. (Eds.). (2001). *Eager to Learn: Educating Our Preschoolers*. Washington, DC: Committee on Early Childhood Pedogogy, National Research Council, National Academy Press.

² Schumacher, R., & Irish, K. (2003, May). *What's New in 2002? A Snapshot of Head Start Children, Families, Teachers, and Programs*. Washington, DC: Center for Law and Social Policy. Available at: http://www.clasp.org/DMS/Documents/1053092277.32/HS_brief2.pdf.

³ Barnett, W.S. (2003, March). *Low Wages=Low Quality: Solving the Real Preschool Teaching Crisis*. New Brunswick, NJ: National Institute for Early Education Research. Available at: <http://nieer.org/resources/policybriefs/3.pdf>.

⁴ Two organizations have released public estimates of raising Head Start teacher salaries to levels commensurate with kindergarten teachers: the Trust for Early Education and the National Institute for Early Education Research. See testimony of Amy Wilkins, Executive Director of the Trust for Early Education, at <http://edworkforce.house.gov/hearings/108th/edr/schoolreadiness060303/wilkins.htm>, and Barnett, W.S. (2003,

March). *Low Wages=Low Quality: Solving the Real Preschool Teaching Crisis*. New Brunswick, NJ: National Institute for Early Education Research. Available at: <http://nieer.org/resources/policybriefs/3.pdf>.

⁵ The following examples and data are from: Schumacher, R. (2003). *Promoting the Health of Poor Preschool Children: What do Federal Head Start Performance Standards Require?* Washington, DC: CLASP and Schumacher, R. (2003). *Family Support and Parent Involvement in Head Start: What do Head Start Program Performance Standards Require?* Washington, DC: CLASP.

⁶ Gilliam, W.S., & Ripple, C.H. (In press). What can be learned from state-funded prekindergarten initiatives? A data-based approach to the Head Start devolution debate. In E. Zigler & S.J. Styfco (Eds.), *The Head Start Debates (Friendly and Otherwise)*. New Haven, CT: Yale University Press.

⁷ National Conference of State Legislatures. (2003, April). *Three Years Later, State Budget Gaps Linger*. Retrieved on July 1, 2003: <http://www.ncsl.org/programs/press/2003/030424.htm>.

⁸ U.S. General Accounting Office (2003). *Child Care: Recent State Policy Changes Affecting the Availability of Assistance for Low-Income Families*. Washington, DC: Author.