

CLASP

CENTER FOR LAW AND SOCIAL POLICY

September 24, 2004

Administration for Children and Families
Office of Information Services
Attention: ACF Reports Clearance Officer
370 L'Enfant Promenade, SW
Washington, DC 20447
grjohnson@acf.hhs.gov

Re: Comments Regarding Head Start Program Information Report

To Whom It May Concern:

Thank you for seeking comments regarding the collection of information using the Head Start Program Information Report (PIR). The PIR provides valuable data about Head Start children, families, teachers, and programs, which offer insights into the services the program provides and whom it serves. These data also provide important contextual information for policy debates in Congress about the future direction of the Head Start program. We strongly support the continuation of the timely annual PIR data collection process and release of data and would further urge PIR to be strengthened to respond to emerging issues.

These comments are submitted on behalf of the Center for Law and Social Policy (CLASP). CLASP is a nonprofit organization engaged in research, analysis, technical assistance, and advocacy on a range of issues affecting low-income families. In recent years, CLASP researchers have authored a series of policy briefs using the PIR data from 1997 through 2003. During the course of this research, several questions emerged about the PIR data, and we would like to take this opportunity to share with you the following desired clarifications or expansions of the data:

- **Need for full-day, full-year services.** The PIR asks programs to report on the number of children who need full-day and/or full-year child care, but it is not clear what is meant by full-day or how agencies should collect this information from parents. We recommend that the guidance to agencies is revised to define full-day and to clarify whether this data point refers to a need at a single point in time or a need at any time during the year. We also recommend that the category is renamed “need for full-day and/or full-year early education services.”
- **Child care subsidy data.** The PIR reports on the number of Head Start enrollees who received a child care subsidy, but it is not clear exactly how that term is defined in data collection. Does it mean any other assistance a family receives, or is it intended to collect data on receipt of subsidies that are part of the federally

funded Child Care and Development Fund program? While it is difficult to ensure accurate data from parental reporting, guidance could help clarify the desired information and how to discuss it with parents. It would also be helpful to clarify whether the subsidy was used for care provided at the Head Start agency site or with separate caregivers.

- **Under-representation in receipt of screenings.** Head Start Program Performance Standards require that children are screened for developmental, sensory, and behavior concerns within 45 calendar days of enrollment. However, 5 percent of Head Start children left the program within 45 calendar days of enrollment in 2003. Currently, there is no way to adjust the figures to exclude those children who dropped out of Head Start before the 45 day calendar requirement, resulting in a potentially smaller percentage of children who received medical screenings, dental exams, and immunizations or were referred to mental health specialists than were actually served. It would be helpful if in the review of the PIR, HHS could determine if there were a way to make this data point more accurate.
- **Race/ethnicity of Head Start teachers.** Currently, the PIR collects data on race and ethnicity of direct child development staff, which includes teachers, assistant teachers, home visitors, and family child care teachers. In 1998, teacher education requirements were raised, and further provisions may be included when Head Start is reauthorized again. This may lead to changing demographics among Head Start teachers. It would be useful to have the race and ethnicity data broken down for each category of child development staff, rather than lumped together.
- **Follow-up services for specific diagnoses.** The PIR reports on the number of children who are diagnosed as needing medical treatment, the total number of children diagnosed who received treatment, and the number of children who received treatment for specific conditions. In order to determine whether children with certain diagnoses are under-treated, we recommend that the PIR collect data on the condition for which children are diagnosed as needing medical treatment.
- **Primary caregivers or guardians.** Families are changing, and many low-income children are cared for primarily by someone other than their biological parents, whether it is a grandparent, other relatives, or foster parent. The PIR could collect data on the primary caregivers of Head Start children.
- **Pre-kindergarten programs.** States now deliver state-funded pre-k in schools, child care centers, and Head Start centers. We recommend that the PIR collect data on whether Head Start children participate in a pre-k program in addition to the Head Start program and, if so, whether that pre-k program is housed at the Head Start site.
- **TANF receipt and work.** Since the mid-1990s, many families who receive TANF benefits also work. Currently, the PIR reports on employment status and TANF receipt separately. It would be useful to know, of the Head Start families who are receiving TANF, how many of them are working as well.
- **Family work schedules.** In recent years, it has become increasingly common for low-income families to have non-standard work hours. Of the Head Start families who are employed, the PIR could report how many have standard (9 to 5) work hours. Of those with standard work hours, how many are working shifts rather

than regular schedules? How many Head Start families have non-standard (evening or weekend) work hours? Of those with non-standard work hours, how many are working shifts rather than regular schedules? Finally, how many Head Start families work shifts that encompass both standard and non-standard work hours?

- **Children with challenging behaviors.** Child development research is increasingly focusing on children with challenging behaviors. We recommend that the PIR report on the number of Head Start children who exhibit challenging behaviors. The term “challenging behavior” must be defined clearly, and agencies must receive guidance on what this category means.

The PIR is an incredibly valuable research tool, but we believe that it can be even stronger if the above recommendations are incorporated. Thank you again for the opportunity to comment on this important program.

Sincerely,

Rachel Schumacher
Director of Child Care and Early Education

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