

JULY 2014





Renewing Head Start's Promise:

INVEST IN WHAT WORKS FOR DISADVANTAGED PRESCHOOLERS

Sara Mead



© 2014 Bellwether Education Partners

-  This report carries a Creative Commons license, which permits noncommercial re-use of content when proper attribution is provided. This means you are free to copy, display and distribute this work, or include content from this report in derivative works, under the following conditions:
-  Attribution. You must clearly attribute the work to Bellwether Education Partners, and provide a link back to the publication at <http://bellwethereducation.org/>.
-  Noncommercial. You may not use this work for commercial purposes without explicit prior permission from Bellwether Education Partners.
-  Share Alike. If you alter, transform, or build upon this work, you may distribute the resulting work only under a license identical to this one.

For the full legal code of this Creative Commons license, please visit www.creativecommons.org. If you have any questions about citing or reusing Bellwether Education Partners content, please contact us.

JULY 2014

Renewing Head Start's Promise:

INVEST IN WHAT WORKS FOR DISADVANTAGED PRESCHOOLERS

Sara Mead



TABLE OF CONTENTS

ACKNOWLEDGEMENTS	i
FOREWORD	iii
EXECUTIVE SUMMARY.....	iv
HEAD START’S TRACK RECORD AND RECENT REFORMS	1
HEAD START WORKS, BUT IT COULD WORK MUCH BETTER.....	2
HEAD START IS MAKING PROGRESS.....	4
HOW IS DESIGNATION RENEWAL WORKING?.....	7
RESULTS TO DATE	9
FEW NEW PROVIDERS.....	10
TRANSITION CHALLENGES.....	12
LACK OF TRANSPARENCY.....	13
FUNDAMENTAL CHALLENGES.....	14
LACK OF CLEAR PERFORMANCE MEASURES	14
OVEREMPHASIS ON COMPLIANCE	18
LACK OF FOCUS.....	20
IGNORING CURRICULUM.....	23

TABLE OF CONTENTS (continued)

RETHINKING THE STATE ROLE	25
THE WORLD HAS CHANGED	31
RECOMMENDATIONS	32
MAXIMIZE THE EFFECTIVENESS OF DESIGNATION RENEWAL	32
SET CLEAR GOALS AND MEASURE PROGRAM PERFORMANCE	33
INCREASE FLEXIBILITY TO INNOVATE	35
EXPLORE A STATE ROLE IN HEAD START	36
CONCLUSION	37
ENDNOTES	38

ACKNOWLEDGEMENTS

Head Start is an incredibly complex program with a rich history. The author is very grateful to the many individuals who shared their knowledge and thoughts for this project, including Ellen Frede, Frank Fuentes, Yvette Sanchez Fuentes, John Gasko, Robert Gordon, Katie Hamm, Ron Haskins, Aaron Lieberman, Lydia Carlis, and Robert Pianta. Thanks particularly to Steven Dow, Judy Jerald, Dana Jones, Aaron Lieberman, and Jack McCarthy for sharing the work their programs do day in and day out to improve the lives of preschoolers living in poverty. Michele Jolin, David Medina, Marta Urquilla, Andrew Rotherham, and Larry Abramson provided critical editorial input. Thanks particularly to Leslie Kan for managing the editorial process of this paper, and to Sandy Fleishman and Noelle Grattan for copy-editing and design support. Results for America, an initiative of America Achieves, wants to thank Bloomberg Philanthropies for its generous support for the production of this report. The opinions expressed herein are those of the author alone, as are any errors of fact or analysis.

ABOUT THE AUTHOR

Sara Mead is a principal with Bellwether Education Partners. She can be reached at sara@bellwethereducation.org.

ABOUT RESULTS FOR AMERICA



Results for America, an initiative of America Achieves, is committed to improving outcomes for young people, their families, and communities by shifting public resources toward programs and practices that use evidence and data to improve quality and get better results.

This report is part of Results for America's "Invest in What Works Policy Series," which provides ideas and supporting research to policymakers to drive public funds toward evidence-based, results-driven solutions. The series will include policy papers, expert roundtable discussions, and public events. Bloomberg Philanthropies graciously provided support for the launch of the Invest in What Works Policy Series.

ABOUT BELLWETHER EDUCATION PARTNERS



Bellwether Education Partners is a nonprofit dedicated to helping education organizations—in the public, private, and nonprofit sectors—become more effective in their work and achieve dramatic results, especially for high-need students. To do this, we provide a unique combination of exceptional thinking, talent, and hands-on strategic support.

**Bloomberg
Philanthropies**

This report has been published with the generous support of Bloomberg Philanthropies.

FOREWORD

In May 2014, Results for America (RFA) issued its third federal *Investing in What Works Index*, which highlights the extent to which the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services and four other federal departments and agencies are currently building the infrastructure necessary to be able to use evidence and evaluation in budget, policy, and management decisions.

While this RFA index highlights Head Start as one of ACF's most evidence-based programs, the following paper outlines several policy recommendations that can help make Head Start even more focused on data and evidence and improved outcomes for our nation's young people.

EXECUTIVE SUMMARY

Americans increasingly recognize what research shows—high-quality preschool programs have the potential to improve children's school readiness, narrow achievement gaps, and put children on track to become successful adults. In response, policymakers at the national, state, and local levels—from Alabama to New York City, to the White House—are calling for and making new investments in preschool programs. But too often Head Start is ignored in these efforts.

As our nation's largest preschool program—and the only one exclusively focused on the poorest children—Head Start plays a critical role in our nation's early learning and development system, and it will continue to do so. As policymakers seek to extend the benefits of quality preschool to more children, improving Head Start must be part of these efforts.

Despite ongoing debate about Head Start's effectiveness, the best available research suggests that Head Start programs improve children's kindergarten readiness at school entry; that participating in Head Start has significant long-term benefits compared with no preschool at all; and that some Head Start programs are producing even greater results. At the same time, the results suggest that Head Start programs are, on average, not matching the results of the highest-performing pre-k programs. If all Head Start programs matched the results produced by the best pre-k programs, we could dramatically improve outcomes for our nation's poorest youngsters.

Since Head Start's last reauthorization, in 2007, the Department of Health and Human Services, which oversees Head Start, has implemented significant reforms that are improving the program:

- Head Start now uses the Classroom Assessment Scoring System, a research-based observation system, to measure the quality of teaching in Head Start classrooms and drive improvements in instruction.
- Through the new “designation renewal” system, the Office of Head Start has required low-performing grantees to compete for their grants, terminated the grants of weak grantees, and replaced them with higher-quality providers.

These changes represent real progress, but additional change is still needed. Head Start continues to lack clear, comprehensive goals for program performance; to overemphasize compliance; to require programs to do too many different things; and to pay too little attention to curriculum. Head Start's unique federal-to-local structure creates challenges in coordinating with state-run pre-k programs, efforts to improve child care quality, and the K-12 public school system. In addition, the designation renewal system can be improved to maximize its potential to drive quality improvement and attract high-quality new providers to Head Start.

To address these challenges and enable Head Start to better serve children and families, this paper recommends the following steps:

Maximize the effectiveness of designation renewal:

- Increase transparency in Head Start monitoring and designation renewal processes.
- Prioritize performance and innovation in the designation renewal process.
- Encourage new providers.
- Improve planning for transition.

Set clear goals and measure program performance:

- Establish clear metrics of program performance at the grantee level.
- Expand analysis of Head Start performance data.
- Make monitoring reports transparent and easy to access.

Increase flexibility to innovate:

- Revise the Head Start Performance Standards to focus less on compliance and more on improving outcomes for children and families.
- Allow grantees to apply for waivers.
- Rethink Head Start's matching requirement.

Carefully explore options to expand the state role in Head Start while protecting federal investments and comprehensive services for Head Start children.

By strengthening Head Start we can improve both the school readiness and long-term life outcomes for our nation's most disadvantaged youngsters.

HEAD START'S TRACK RECORD AND RECENT REFORMS

Nearly 50 years ago, President Johnson launched Head Start with a simple goal: Break the cycle of poverty by intervening early to put children on track for success in school and life. Extra attention in the early years would give poor kids a head start, a jump that would help them catch up with their more affluent peers. Today, Head Start serves nearly 1 million children, four times as many as the largest state pre-k program, and its funding is 60 percent greater than that of all state pre-k programs combined. Focused on the neediest children, Head Start remains the only preschool option for poor children in many communities.

For all of its successes, Head Start faces real challenges. It has performed relatively poorly in recent federally funded evaluations, raising questions about its long-term effectiveness. In addition, the landscape for early childhood education has changed in fundamental ways since Head Start began. Researchers have documented the tremendous brain development that occurs in the first five years of children's lives, as well as the potential of high-quality preschool programs to enhance early learning. This research has spurred public and policymaker interest in early childhood education, including the rapid growth of state pre-k programs. President Obama recently called for a \$70 billion, 10-year federal investment to further expand these efforts.

In many ways, these developments validate Head Start's original mission and vision. At the same time, they create new challenges, raising expectations for children's early learning and increasing competition from state pre-k and other new programs. As the idea of early childhood education as an anti-poverty strategy has gained traction in public policy, the program that pioneered this concept—Head Start—is largely absent from the conversation. Today, early childhood advocates push expansion of state pre-k programs or new ways to reach younger children, but focus little attention on improving Head Start.

To remain relevant and sustainable in this evolving landscape, Head Start must also evolve. Over the past five years, Head Start's leadership has taken some significant steps to modernize the program, but the program's structure and rules continue to pose barriers to more radical transformation. Advocates of early childhood education, as well as school reformers, need to help energize the discussion, to ensure this key initiative remains effective.

HEAD START WORKS, BUT IT COULD WORK MUCH BETTER

In his recent report on poverty, U.S. Rep. Paul Ryan (R-Wis.) declared that Head Start is “failing to prepare children for school.”¹ Former U.S. Assistant Secretary of Education for Research Russ Whitehurst has also written that “Head Start isn't doing the job the families it serves and the nation need.”² The narrative that Head Start doesn't work has taken hold with a significant subset of policymakers, policy wonks, and in the media. But is it accurate?

Both Ryan's and Whitehurst's remarks reference the Head Start Impact Study, a rigorous, federally funded evaluation of Head Start that began in 2000 and published its final conclusions in 2013. The Impact Study found that Head Start students made meaningful gains in early literacy skills, when compared with a control group of similar nonparticipants. The study also found improvements in some behavior, health, and parenting outcomes for participating children. But these gains had largely disappeared by the time children completed third grade.

While critics such as Ryan and Whitehurst view these results as evidence of Head Start's failure, supporters have argued that the program improves children's learning in preschool, but that public schools are failing to sustain these gains.

Indeed, other studies, which tracked Head Start participants into adulthood, have found evidence of longer-lasting gains. Researcher David Deming, for example, tracked long-term outcomes for children who participated in Head Start and their siblings who did not.

He found that the siblings who attended Head Start had substantially higher high school graduation rates, as well as better outcomes on other measures of adult well-being.³ These studies use less rigorous research methods than the Head Start Impact Study, however, leading some critics to suggest that their results deserve less credence.

There is, however, a more likely explanation for the difference between these studies' findings and those of the Head Start Impact Study: the rapid expansion of preschool programs outside Head Start. Deming's study focused on children who attended Head Start between 1984 and 1990. The Head Start Impact Study, in contrast, looked at children who attended Head Start in 2002-2003. In between those two time frames, the share of American 3- and 4-year-olds attending some form of preschool increased nearly 50 percent. As a result, children in the control group for the Head Start Impact Study—those not receiving Head Start services—were much more likely to be enrolled in some form of preschool program than were the comparison group children in older studies. Fully 60 percent of the children in the control group for the Head Start Impact Study attended some other form of center-based care. If Head Start is no longer achieving long-term effects relative to the alternatives, this may not mean that Head Start has gotten worse, but that the alternatives have gotten better.

Head Start appears to deliver long-term gains compared with no preschool at all. Yet no preschool is what many children would get if Head Start's resources were to disappear.

This also means that it is a mistake to conclude that Head Start “does not work.” Even in the Impact Study, Head Start delivers immediate learning gains while children are in the program. Based on the non-experimental studies, Head Start appears to deliver long-term gains compared with no preschool at all. Yet no preschool is what many children would get if Head Start's resources were to disappear. Despite the growth of state-funded pre-k programs, there are almost twice as many poor

preschoolers nationally as slots in these programs. Private preschool remains beyond the financial means of the impoverished families Head Start serves. In the absence of Head Start, many of these families would be forced to use low-quality, informal child care arrangements—which evidence suggests may actually hurt children: A 2010 study found that low-income children whose parents received child care subsidies behaved worse and learned less than children whose mothers did not receive subsidies.⁴ Compared with these outcomes, even the Head Start Impact Study results look pretty good.

But even if Head Start is more effective than it's often made out to be, that doesn't mean it is as effective as it should be. Numerous studies of other preschool programs have found learning gains that were larger or more enduring than those found in the Head Start Impact Study. Studies of large-scale, publicly funded pre-k programs in Boston; New Jersey's Abbott districts; Tulsa, Okla.; and North Carolina all found evidence of learning gains at the end of preschool that were much larger than those in the Head Start Impact Study.⁵ More importantly, these gains lasted until at least the middle of elementary school. A recent meta-analysis of preschool studies similarly found that, on average, preschool programs generate lasting gains not found in the Head Start Impact Study.⁶

Within Head Start, some grantees produce learning gains that are much larger than average. An independent evaluation of Acelero Learning, which operates Head Start centers in New Jersey, Pennsylvania, Wisconsin, and Nevada, found that 3- and 4-year-olds who spent two years in their program made gains on assessments of early language and literacy skills that were twice as large as the average gain for all Head Start students, as measured through Head Start's own FACES study.⁷ Acelero Learning students also made gains in math larger than those of their national Head Start peers. If all Head Start grantees simply matched Acelero Learning's results, they would enter school significantly more prepared.

Measuring results in education programs is complicated. It would be wrong to conclude, based on the existing evidence, that state pre-k programs in general outperform Head Start. But the collective body of research does suggest two things: First, Head Start does benefit the children who attend—meaning that calls to eliminate or defund the program are misguided. Second: It's possible for early childhood programs to produce better results than Head Start currently produces—meaning that we need to reform the program to match those results.

HEAD START IS MAKING PROGRESS

Debate over Head Start's effectiveness is not new. Almost since Head Start's creation, critics have challenged its effectiveness and argued that it underemphasizes academic preparation for school. While both criticisms miss the mark in key respects, they have also led to efforts to strengthen the program. In 1998, Congress enacted bipartisan legislation to increase Head Start's emphasis on early childhood education. For the first time, Head Start was required to develop specific education performance standards. Educational requirements for Head Start teachers were also increased.⁸

The 2007 reauthorization of Head Start expanded on these reforms. It further increased educational expectations for Head Start teachers, requiring all of them to have an associate's degree by 2011 and half to have a bachelor's degree by 2013.⁹ It also included provisions to enhance coordination between Head Start and state preschool programs, which had grown rapidly over the preceding decade.¹⁰

The law included two more fundamental reforms: First, it required the Office of Head Start to observe the quality of teaching in Head Start classrooms as part of program monitoring reviews. Historically, these reviews had focused primarily on evaluating program compliance with Head Start's many regulations related to health, safety, and program administration—not on the quality of children's learning experiences. The increased focus on teaching quality is a significant, and positive shift. To ensure quality observations, the law required Head Start to adopt a "valid and reliable" observational protocol that is based on research, linked to child outcomes, and focused on the quality of adult: child interaction in Head Start classrooms.¹¹ The tool Head Start adopted is known as the Classroom Assessment Scoring System, or CLASS.

A second major change involved the way Head Start grants work: For most of the program's history, Head Start grants have been continuous—once an organization received a Head Start grant, it continued to be a Head Start grantee unless it committed a significant violation of the program's rules. The 2007 reauthorization changed this. Rather than an indefinite grant, all Head Start grants are now renewable, five-year grants. At the end of each five-year term, grantees that are running high-quality programs will have their grants renewed. But grantees that fall short of standards are now required to compete to renew grants. Grantees whose ratings on any of the three CLASS domains fall below a certain threshold, or in the lowest 10 percent of grantees, must also compete. This process, known as "designation renewal," is designed to raise the bar for Head Start performance by removing low-performing providers from the program and allowing other organizations to apply for Head Start funds.

These reforms, which combined research on effective preschool practices with principles of performance-based government, had strong bipartisan support in Congress. That they were signed into law by Republican President George W. Bush and have since been aggressively implemented by the administration of his Democratic successor, President Barack Obama, further illustrates their bipartisan appeal.

EXPLAINING DESIGNATION RENEWAL

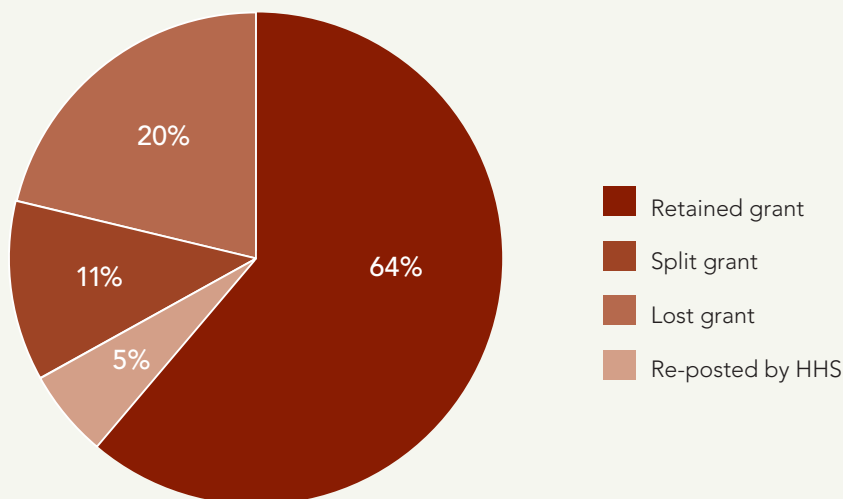
Under the 2007 reauthorization, any Head Start grantee that is not found to be operating a “high-quality and comprehensive” Head Start program must compete to renew its grant. HHS has established seven criteria to identify Head Start grantees who fall short of standards. These seven criteria include:

- deficiencies identified in Head Start monitoring review
- license revocations by state or local licensing agencies
- suspensions by HHS
- disbarment by any state or federal agencies
- significant financial risk
- failure to establish goals for improving children’s school readiness
- low CLASS scores.

The law also provides a three-year transition period for HHS to transition all Head Start grantees from continuous to five-year grants. In 2012, the first year in which ACF implemented the designation renewal system, 130 grantees were required to compete for their grants. These programs were identified for competition based solely upon the first five criteria listed above, rather than all seven criteria, because ACF did not begin collecting CLASS scores for Head Start grantees until 2009. In 2013 and 2014, the second and third years of the transition period, ACF identified grantees for designation renewal based on all seven criteria, including CLASS scores and use of assessments for school readiness.

By 2015, all current Head Start grantees will have transitioned to five-year renewable grants, whether or not they were required to compete. After that, all grantees will be reviewed a year prior to the conclusion of their five-year grants, and will either have their grant renewed for a subsequent five-year term, or be required to compete. Grantees will continue to undergo Head Start monitoring reviews every three years, and these monitoring reviews will inform their subsequent grant renewals.

FIRST ROUND DESIGNATION RENEWAL RESULTS



Note: Based on 129 grantees. Does not include grantees identified for Birth-to-Five pilot competition.

HOW IS DESIGNATION RENEWAL WORKING?

Designation renewal has an obvious rationale. Over the past 25 years, public policies have shifted to hold public agencies and their grantees increasingly accountable for the results that they produce, and to condition future funding on demonstrated results. This trend can be seen across the policy spectrum, in programs like the Workforce Innovation Fund in the U.S. Department of Labor, the Investing in Innovation Fund in the U.S. Department of Education, and the Social Innovation Fund in the Corporation for National and Community Service.

By identifying underperforming grantees and requiring them to compete for their grants—or potentially lose funding—designation renewal extends this trend to Head Start. At the same time, designation renewal also creates an opportunity to attract new, potentially better providers to Head Start. Historically, new organizations that wanted to serve low-income preschoolers had limited ability to access Head Start funds. Existing grantees held an indefinite monopoly on Head Start funding for their communities. Even if a new provider could do a better job than its local Head Start grantee, there was no avenue to make that case to the federal government. Designation renewal allows new providers to compete for Head Start funds in communities where the existing grantee has fallen short of expectations. In theory, this opportunity should attract new talent and high-quality providers to Head Start, or enable existing high-quality providers to grow to serve more youngsters.

BIRTH-TO-FIVE FUNDING OPPORTUNITIES

Five Head Start funding opportunities in the 2012 designation renewal process, and nearly half of those in the 2013 competition, were offered as Birth-to-Five funding opportunities—allowing prospective grantees to submit a single application to deliver both Early Head Start (for infants and toddlers) and Head Start (for preschoolers) in the same service area. This approach has real potential to improve continuity and alignment of services for Head Start children from birth through preschool—not just in Head Start services but also across Head Start, state or district-funded pre-k and other early childhood services.

As access to state and district pre-k programs has expanded, many Head Start grantees have found themselves competing for children with pre-k programs, even as poor infants and toddlers remain underserved. Although the 2007 reauthorization allows Head Start grantees to reallocate funds from Head Start to Early Head Start with approval from the U.S. Secretary of Health and Human Services, this process has been slow and cumbersome. The Birth-to-Five Pilot will allow grantees to shift funds between Head Start and Early Head Start programs, and will provide much greater flexibility in doing so. This will enhance grantees' ability to offer continuous services as children grow from infants to toddlers to preschoolers.

The Birth-to-Five Pilot also encourages better coordination between Head Start and state-funded pre-k services offered either by the grantee or by other organizations in the community. In Washington, D.C., for example, publicly funded pre-k is almost universally available. United Planning Organization, a major Head Start grantee, submitted a Birth-to-Five Head Start application that would allow UPO to focus its direct services on infants and toddlers. When these children reach preschool-age, they will move on to pre-k in either District of Columbia Public Schools or a pre-k charter school. UPO has established a partnership to support transitions and provide wraparound comprehensive services to Head Start-eligible children in these settings. To the extent that other grantees take advantage of Birth-to-Five funding opportunities to improve coordination between Head Start and other early childhood services, and provide a continuum of care for children ages birth to 5, this could yield significant benefits for Head Start children.

But has this theory worked in practice?

In many respects, it's too early to say. Three cohorts of Head Start grantees—totaling 355 grantees, or about 22 percent of all Head Start grantees nationally—have been identified to compete for their grants. But only the first two of those cohorts have completed the designation renewal and competition process—providing a limited pool of data. Organizations that received Head Start grants in the first round of competition began serving children less than a year ago, and those in the second round won't begin serving children as grantees until August—so it's too soon to know how this process has impacted children.

That said, the results of the first round of designation renewal do offer some emerging themes, including places where designation renewal has worked well, issues that have proven more challenging, and steps the federal government could take to improve the process.

RESULTS TO DATE

In late 2011, HHS notified 130 Head Start grantees that they would be required to compete for their grants.¹² When HHS announced the competition results the following April, 80 of these grantees—or roughly two-thirds—retained their grants; another 14 retained a portion of their grant but split the award with another organization. Twenty-five grantees—or just under 20 percent—lost their grants to another organization. In six additional communities, HHS did not award a grant at all but instead reposted the grant because the existing grantee's application was too low-quality to fund and no other organizations applied.

Several first-round grants were offered through a separate competition, known as the Birth-to-Five Pilot. This competition allowed potential applicants in five communities—Baltimore, Md.; Detroit, Mich.; Jersey City, N.J.; Sunflower County, Miss.; and Washington, D.C.—to submit a single application to offer both Head Start and Early Head Start services in their community. HHS announced the outcomes of this competition in February 2014. The primary existing grantees in Baltimore and Washington, D.C., retained their grants, and some former delegate agencies also received direct funding. In Detroit, where the previous grantee had been revoked, and an interim grantee was serving children, several former delegates worked together to apply for grants. In Jersey City and Sunflower County, the existing grantee lost the grant and was replaced by an agency that operates Head Start programs in another jurisdiction.

THE POTENTIAL OF NEW PROVIDERS: SAVE THE CHILDREN

For more than 80 years, Save the Children has provided education, health, nutrition, and disaster services to children in the United States and internationally. Save the Children's education work in the United States focuses on school readiness and literacy, with a particular focus on underserved rural communities. Save the Children's Early Steps to School Success program partners with schools and states to ensure that children in some of the nation's poorest communities are prepared for success in school. Through home visiting, book exchanges, and transition to school activities, Early Steps to School Success supports parents and caregivers in developing skills and strategies to support child development and builds connections between families and schools. The program is currently in place in 14 states and the District of Columbia.

In the late 2000s, prior to designation renewal, Save the Children became aware that the Office of Head Start had revoked a grant to a Head Start operator serving several Arkansas communities and was unable to find a qualified local agency to serve children in those areas. Save the Children applied to operate Head Start programs serving children in three counties and received the grant. Since then, it has pursued and won grants to operate Head Start programs in additional communities—in Arkansas, Louisiana, and Mississippi—that lack qualified early childhood providers, offering high-quality programs to children in these communities. Most recently, in April 2014, Save the Children received a Birth-to-Five Pilot grant to operate Head Start programs serving some 650 children in Sunflower County, Miss. This grant will allow Save the Children, working with community partners, to implement a quality early childhood education program and integrate Head Start and Early Head Start services to increase continuity for children.

Improving designation renewal could help attract more high-quality providers like Save the Children to Head Start.

In spring 2013, ACF announced a second cohort of 122 grantees required to compete for their grants. Nearly 40 percent of these grantees were identified for re-competition based on CLASS scores, although about half also had other weaknesses. About half of the grants in the second round were offered as Birth-to-Five funding opportunities, significantly expanding on the previous pilot. Selected applicants were notified of their selection in spring 2014, but HHS has not finalized their contracts or publicly announced their names.

In February 2014, HHS announced a third round of 103 Head Start grantees that would be required to compete for their grants in 2014. HHS has not yet released applications for these grants.

FEW NEW PROVIDERS

Because the designation renewal process is new, it's not obvious what the "right" amount of grantee turnover is. Given Head Start's historic reluctance to terminate underperforming

grantees,¹³ the fact that 25 grantees lost their grants in the first year represents significant progress. Given that grantees are identified for designation renewal based on previous performance problems, an 80 percent retention rate looks quite high. This may simply mean—as some experts argue—that the threat of competition spurred existing grantees to improve their programs. If so, this would be a success for designation renewal.

Head Start operators and program experts also agree that there are real benefits to increasing the number of grantees and enabling some former delegates to receive their grants directly. In some Head Start service areas, large grantees have historically delivered services through subcontracts with delegate agencies that actually run the centers. This arrangement works well in some places. In others, however, lead grantees negotiated relationships in which delegate agencies received only a portion of Head Start per-pupil funding and grantees retained a significant share of funds while providing little in the way of services or support. Enabling these delegate agencies to receive funds directly from the federal government should result in more dollars in the classroom and better services for Head Start children. In other communities, transferring the Head Start grant from a weak previous grantee to a stronger former delegate should also improve services. Allowing effective grantees from one jurisdiction to expand to serve children in other communities is also a good thing.

But if designation renewal is helping high-performing existing delegates to serve children better or to serve more children, it still does not appear to be attracting new organizations or talent to Head Start. Of 175 agencies that received grants in the first round or Birth-to-Five Pilot, only eight were not already running a Head Start program. Even when existing grantees lost grants, the winners were typically other organizations that already offered Head Start as delegates or in another community. Many high-quality pre-k providers outside of Head Start have the potential to operate high-quality Head Start programs—but designation renewal doesn't seem to be attracting them.

Why aren't more organizations seizing the opportunity to become Head Start grantees? Head Start's complex rules are one major barrier. Learning these rules in the relatively short time frame allotted to craft an application may be too overwhelming for new providers. "With 2,400 regulations it's hard to write an application that doesn't make a misstep with one of them," says one early childhood expert who has worked with Head Start applicants. "That has a chilling effect." Some communities—particularly in rural areas—also lack high-quality providers able to apply for Head Start grants. Where high-quality community-based preschool and child care centers do exist, many of them are structured as small businesses—meaning that an existing ACF prohibition on profit-taking by Head Start grantees effectively excludes them from the program.

KIPP'S EXPERIENCE IN HOUSTON

The designation renewal process was intended to attract new, high-quality providers to Head Start. But in some cases, politics and status quo bias appear to have prevented potentially high-quality applicants from receiving grants. KIPP Houston, a charter school network with an exemplary record of serving pre-k-12 students, has operated Head Start programs as a delegate agency of three different Houston-area Head Start grantees. When one of those grantees, Neighborhood Centers Inc., was identified for designation renewal in 2011, KIPP Houston saw this as an opportunity to improve the quality of services it provided to its Head Start students, and submitted an application to serve a subset of the children previously served by Neighborhood Centers. HHS chose to award the entire grant for the service area to Neighborhood Centers. Because HHS does not release applicant scores, it is not clear why KIPP—which received positive feedback from reviewers on many components of its application—was not selected for a grant. A few reviewer comments, however, suggest that reviewers may have had difficulty understanding some of the choices KIPP made to implement Head Start in a charter school context—which differs from the contexts with which many traditional Head Start and early childhood educators are familiar. Similarly, Child Care Network, a for-profit that has a strong track record serving children in universal pre-k programs across the South, was unsuccessful in applying for two small Head Start programs in Florida.

TRANSITION CHALLENGES

When new organizations do receive a Head Start grant through designation renewal, the transition process has proven incredibly rocky. HHS does not finalize the awards and issue contracts until July, for grantees to begin serving children in August. This is a very short timeline to launch a new program. “If you’re not an existing program in the community doing that kind of work, it’s very difficult” to get up and running in such a short time frame, says one Head Start leader whose agency has both competed successfully for Head Start grants and helped other organizations to do so. While this short timeline may be prohibitive for new providers, it also creates numerous challenges even for organizations with experience delivering Head Start programs. Former grantees are expected to transfer the existing Head Start facilities, materials, and other resources to the new grantee, but they are often—not surprisingly—resistant to doing so, making it difficult for new grantees to secure the buildings, buses, and other equipment they need to serve children. In other cases, new grantees have received control of a building in July only to find significant repair or maintenance issues that must be addressed in just a few weeks. New grantees in many states also need to re-apply for child care licenses for these buildings in their own names. If the state bureaucracy moves too slowly to complete the licensure process by the beginning of the school year, children may lack access to services for a period of time. These transition issues have created major challenges for many new grantees, and ultimately have negative impacts on children.

LACK OF TRANSPARENCY

One reason it's difficult to parse the results of designation renewal is that HHS has not made the process as transparent as it can or should be. In contrast to high-profile federal competitive education grant programs such as Race to the Top or Investing in Innovation—where all submitted applications, names of reviewers, applicant score sheets, and final scores were all released publicly online—HHS has released relatively little information to the public about designation renewal. In the first round and the Birth-to-Five Pilot, HHS announced the selected grantees, but has not released the number or names of the agencies that applied for Head Start grants or the scores received by successful and unsuccessful applicants. HHS has not yet publicly released the names of selected grantees in the second round. HHS also has not shared the scoring guides and criteria used by reviewers to evaluate grant applications. Grant applicants themselves don't even receive their final application scores—just a list of reviewer comments on the application's strengths and weaknesses.

This lack of adequate transparency has real consequences. It deprives the taxpaying public of information about the operations of a major federal program. It obscures from prospective grantees how they will be judged—and feeds suspicions from some grantees that the process is not objective. It also limits the Office of Head Start's ability to use the competition as a tool to drive policy improvements.

Designation renewal is still a very new policy. As with any new policy, there are going to be glitches. So far, designation renewal appears to have had a number of benefits—spurring improvements by some identified grantees and evening the playing field for some former delegates. The Birth-to-Five Pilot also appears promising. But it's also clear that the policy could work better.

The biggest weakness of designation renewal isn't the policy itself, but larger structural weaknesses within Head Start.

The biggest weakness of designation renewal, however, isn't the policy itself. Structural weaknesses within Head Start, which the 2007 reauthorization did not address, undermine designation renewal in critical ways. To maximize Head Start's impact, these flaws need to be addressed.

FUNDAMENTAL CHALLENGES

LACK OF CLEAR PERFORMANCE MEASURES

A tremendous amount of ink has been spilled over the question of “whether Head Start works?” But the much more important question about Head Start performance—the one that really matters to parents, children, and communities is: “How well does this Head Start provider, in this community, work for these kids?” With more than 1,600 Head Start grantees nationally, there’s almost certainly wide variation in the answer.

For most of its history, Head Start hasn’t been able to answer this simple question about how its grantees perform. That’s partly because the question itself is complex. Head Start asks grantees to do a number of things—from ensuring children receive health services, to supporting their literacy development, to providing parent education—many of which are difficult to measure. But this isn’t just a measurement issue: It’s also a reflection of Head Start’s design. Head Start was designed to deliver services to children, families, and communities—not focus on outcomes—so its historic monitoring processes focused on ensuring that grantees delivered required services in the prescribed way. At the time Head Start was created, when many poor families had very limited access to educational, health, and social services, this made sense, and also reflected the approach of contemporaneous education integration and War on Poverty initiatives. But it’s largely out of step with the increased focus on results in public policy today.

It's also a critical weakness for the designation renewal system. Designation renewal is based on the premise that low-performing grantees—those that do not offer a “high-quality and comprehensive” Head Start program—should be required to compete for grants. But operationalizing this idea requires an effective approach to differentiating grantee performance.

At the time of the 2007 reauthorization, Head Start had no such system. Head Start has since developed a set of criteria to identify low-performing grantees. These criteria reflect a thoughtful approach to meeting the requirements of the 2007 law (see sidebar), but they are not a comprehensive measure of grantees' performance. Several criteria focus on minimal standards: Grants may not be renewed if the grantee has lost its licenses, been suspended by HHS, been disbarred by any other federal or state agency, or is in financial trouble. Grantees are also required to compete if their last monitoring review uncovered a “deficiency”—a serious deviation from Head Start standards. None of these criteria directly address child or family outcomes. The system is also binary—grantees either qualify for designation renewal or they don't—rather than differentiating multiple levels of performance in a way that can drive ongoing improvement and provide useful information to parents and communities about the quality of individual programs.

In the absence of more comprehensive performance metrics, one of the designation renewal criteria—classroom observations conducted using the Classroom Assessment Scoring System—has become the central metric of program quality.

CLASS, adopted throughout Head Start in response to the 2007 reauthorization, is an important advance. For the first time, it establishes a meaningful measure of quality that is common across all Head Start programs. But CLASS also has real limitations. Research shows that CLASS scores are predictive of children's learning outcomes—meaning that children whose teachers score higher on CLASS learn more than children whose teachers score lower—but CLASS itself is not a measure of child outcomes. When used alone, as opposed to in combination with other measures, its predictive power is limited. In other words, children whose teachers score high on CLASS learn more, but not that much more, than other children.¹⁴

EXPLAINING CLASS

The Classroom Assessment Scoring System (CLASS) is the instrument selected by ACF to meet the 2007 reauthorization's requirement to include a "valid and reliable observational measure" of classroom quality in Head Start monitoring reviews.

CLASS evolved out of tools developed by researchers in the 1990s to evaluate child care quality. In the early 2000s, some of the same researchers used an early version of CLASS as part of two large studies of emerging state pre-k programs in 11 states. The result of this research surprised the early childhood field: They found that teacher-child interactions, as measured by CLASS, were a much better predictor of children's learning in pre-k than traditional quality standards such as class size, adult-child ratios, and teacher qualifications.ⁱ Subsequent research has reiterated this finding.ⁱⁱ

CLASS rates preschool classrooms in three domains (there is also a toddler version with slightly different domains):

- Emotional Support looks at the emotional climate teachers create in the classroom, their sensitivity and responsiveness to children's perspectives. Scores on the emotional support domain of CLASS are correlated with children's social-emotional development.
- Instructional Support looks at the quality of instruction in classrooms, the way teachers use language with children, and the extent to which they create learning experiences and interactions that foster children's cognitive, language, and early literacy development. Scores on the instructional domain of CLASS are correlated with children's cognitive development.
- Classroom Organization looks at how teachers structure the classroom and use time to facilitate high-quality learning experiences and manage behavior effectively.

Within each domain of CLASS are specific dimensions that assess the extent to which teachers are supporting children's cognitive and social-emotional development. The CLASS tool is designed to provide a reliable, objective measure of the quality of adult: child interactions. All CLASS reviewers complete extensive training and must pass a reliability test before being permitted to score programs for Head Start monitoring reviews.

All three domains of CLASS are scored on a 7-point scale. Most preschool and Head Start programs perform relatively well on measures of emotional support and classroom management, but dismally on measures of instructional support, which best predicts learning gains. In these initial studies, the majority of preschool classrooms received a score of less than 2 out of 7 for instructional support.ⁱⁱⁱ The typical Head Start program fares slightly better, getting nearly a 3. But that is still well below the level of performance needed to maximize cognitive gains.^{iv}

ⁱ Robert Pianta, "Preschool Is School, Sometimes," *Education Next* 7, no. 1 (Winter 2007), <http://educationnext.org/preschool-is-school-sometimes>.

ⁱⁱ See, for example: Robert C. Pianta, W. Steven Barnett, Margaret Burchinal, and Kathy R. Thornburg, "The Effects of Preschool Education: What We Know, How Public Policy Is or Is Not Aligned With the Evidence Base, and What We Need to Know," *Psychological Science in the Public Interest* 10, no. 2 (2009): 49-88; Terry J. Sabol, Sandra L. Soliday Hong, Robert C. Pianta, and Margaret R. Burchinal, "Can Rating Pre-K Programs Predict Children's Learning?" *Science* 341, no. 6148 (August 23, 2013): 845-6, doi:10.1126/science.1233517.

ⁱⁱⁱ Diane Early, Oscar Barbarin, Donna Bryant, Margaret Burchinal, Florence Chang, Richard Clifford, Gisele Crawford, Wanda Weaver, Carollee Howes, Sharon Ritchie, Marcia Kraft-Sayre, Robert Pianta, and Steven Barnett, "Pre-Kindergarten in Eleven States: NCEdL's Multi-State Study of Pre-Kindergarten & Study of State-Wide Early Education Programs (SWEEP): Preliminary Descriptive Report," Working Paper (National Center for Early Development and Learning, May 2005), <http://www.fpg.unc.edu/node/4654>.

^{iv} "Use of Classroom Assessment Scoring System in Head Start," February 10, 2014, Office of Head Start, Early Childhood Learning and Knowledge Center, <https://eclkc.ohs.acf.hhs.gov/hslc/hs/sr/class/use-of-class.pdf>

Moreover, CLASS is a relatively narrow measure of program quality, focused exclusively on the quality of interactions between adults and children. It does not address the content of instruction or the quality of a program’s curriculum—both of which impact children’s learning in preschool programs. Nor does it tell us anything about the quality or impact of the health, nutrition, parent engagement, or other non-educational services that are core features of Head Start.

CLASS is our best window for evaluating Head Start quality, but it provides an incomplete picture. Yet the designation renewal system places an outsized emphasis on CLASS. No single measure should be expected to bear the weight that is currently placed on CLASS as a measure of Head Start quality.

In many ways, designation renewal put the cart before the horse: Congress mandated that low-performing grantees compete for their funds, so HHS created a system and set of rules to identify low-performing programs. Ideally, however, Head Start would have developed a robust system of performance metrics for grantees, implemented those metrics across Head Start programs, and refined the measures based on lessons of practice before attaching consequences to them.

It’s too late to do that now. But it’s not too late to create a better system to measure Head Start grantees’ performance. Such a system would:

- Take into account the range of goals that Head Start grantees are expected to advance.
- Include measures of child and family outcomes, as well as teacher quality.
- Differentiate multiple levels of high, acceptable, and inadequate program performance.

In 2003, the George W. Bush administration proposed implementing a common test—known as the National Reporting System (NRS)—to measure the vocabulary, literacy, and math skills of every 4-year-old in Head Start. From the start, the NRS was flawed: It focused only on early academic skills—particularly early literacy—ignoring the social and emotional skills that are equally critical for school readiness. Assessment and development experts raised serious concerns about the developmental appropriateness and technical quality of the proposed assessment and the training provided to teachers to use it.¹⁵ The result was an intense backlash from the field that culminated in a congressional ban on implementation of the NRS. But a decade-old mistake ought not to be a barrier to moving forward with better ways of measuring Head Start performance today.

Increasingly, early childhood education experts acknowledge the need to measure outcomes in early childhood programs as an essential condition for increasing public funding and support. The Obama administration’s Race to the Top Early Learning Challenge grant program,

which requires states to set and track progress toward goals for improving school readiness outcomes of high-needs children, reflects this evolution. The debate is no longer whether to measure early childhood outcomes, but how to do so in a way that is developmentally appropriate. Well-designed performance measures for Head Start won't look like the NRS or like the No Child Left Behind-style assessments used in K-12 public schools. Nor should they focus exclusively on child outcomes. But ignoring outcomes altogether—or focusing on a single indicator, such as CLASS—is not a sustainable approach. Well-designed performance measures should reflect the variety of things we ask Head Start to do. They should include developmentally appropriate measures of crucial child outcomes in language, literacy, math, social-emotional skills, and health, as well as appropriate parent and family outcomes. In addition to outcome measures, performance frameworks should also include evidence-based measures of program quality and practices, such as CLASS. These multiple measures should be integrated into a performance framework that differentiates program performance along a continuum, rather than simply classifying programs as meeting or not meeting standards. This approach can help to drive continuous improvement in early childhood programs. Effective performance management systems don't just identify low-performers; they also identify high-performing programs so that others can learn from and replicate their effective practices, and they help all providers identify their areas of strength and weakness.

OVEREMPHASIS ON COMPLIANCE

In the absence of clear performance measures, Head Start monitoring has instead focused largely on compliance. A Head Start grantee's first responsibility is to comply with the Head Start Performance Standards, a set of 2,400 detailed requirements on everything from potty-emptying to dental care to accounting. Every three years, a team of federal monitors visits each Head Start grantee to review its compliance with these standards. Even high-quality Head Start grantees describe this experience as time-consuming and nerve-wracking. Failure to meet the standards can result in a “deficiency,” which requires grantees to compete to retain their grants.

On their own, most of the standards reflect common sense best practices (e.g., programs should provide a balanced program of adult-driven and child-initiated activities). Other standards specify that cots for napping must be placed at least three feet apart.¹⁶ Many requirements duplicate health and safety provisions that are already addressed by state and local licensure systems—even though Head Start programs are already required to be licensed.

In addition to standards for serving children, Head Start has detailed reporting, documentation, and financial requirements. Programs, for example, must track and report on the number of meals served to children through federally funded nutrition programs. Head Start also requires grantees to obtain “non-federal” contributions equal to 20 percent of the total grantee budget. Because programs can meet this requirement using “in-kind” contributions such as parent volunteer hours, many programs spend a great deal of time tracking and documenting these contributions. Ensuring appropriate use of federal funds is important, but many of Head Start’s rules have become far more complex and burdensome than they need to be, without necessarily accomplishing the goals they were intended to advance.

The real issue, though, is not the individual standards. It’s the collective impact of so many detailed standards. A former executive director of a large Head Start agency describes a culture of “hyper-compliance” in which Head Start administrators find themselves focusing on paperwork and rules rather than on how best to serve children and families. Even when performance-based measures—such as CLASS—have been adopted, Head Start grantees have tended to take a compliance approach. Head Start operators have provided teachers with training about CLASS, but haven’t necessarily focused strategically on identifying or driving change in specific teacher behaviors that are most likely to improve children’s and families’ lives.

Federal policy has moved in the direction of being “tight on goals, loose on means.” Head Start remains loose on goals and tight on means.

In recent years, federal policy has moved in the direction of being, in the words of U.S. Education Secretary Arne Duncan, “tight on goals, loose on means.” Head Start remains loose on goals and tight on means. When Congress increased accountability for Head Start programs through designation renewal, it did not also provide them with clear goals or additional flexibility. New performance measures, such as CLASS, have simply been layered on

top of the Performance Standards, rather than replacing any of them. If anything, designation renewal has increased emphasis on compliance, because programs that fail to meet the Performance Standards can be required to compete for their grants. The complexity and detail of the Head Start Performance Standards has also become a barrier to recruiting new high-quality providers to compete for grants.

To change the odds for the most disadvantaged kids, Head Start needs to produce significantly better results. Examples of high-performing providers—such as the Acelero Head Start program referenced above, or publicly funded pre-k programs in Oklahoma and New Jersey—suggest that it’s possible to achieve such results, and to do so with the level of resources

available in Head Start. But replicating these results at scale will require significant innovation and new approaches to curriculum, assessment, teacher quality, family engagement, and program delivery. Head Start's plethora of requirements and focus on compliance, however, constrain programs' ability to innovate.

It doesn't have to be this way. Making Head Start grantees accountable for their results—which CLASS and designation renewal have started to do, and which stronger performance metrics would further advance—should make it possible to loosen the reins on how they carry out their work on a day-to-day basis, allowing programs to shift focus from compliance to performance, and creating increased space for innovation.

LACK OF FOCUS

Shifting from a focus on compliance to performance requires setting priorities—something Head Start has historically been reluctant to do. While lay observers often think of Head Start as synonymous with preschool, Head Start was never designed to be an exclusively educational program. Rather, Head Start is a comprehensive child development program. Head Start grantees must provide a broad range of services across five distinct domains of child development—health, safety, education, mental health, and nutrition. They are also expected to engage parents and their communities in a variety of ways.

Head Start's emphasis on comprehensive services reflects the integrated nature of child development and the complex, interrelated challenges that face poor families and can interfere with their children's school and life success. Children who come to school ill-nourished, or with untreated dental, vision, or mental health problems are not starting out on a firm foundation for success.

The problem is that, when you're trying to do everything, it's hard to do anything well. This is particularly true when programs operate—as Head Start does—in a context of limited resources. Although Head Start programs are better funded than the typical child care center or state pre-k program, Head Start's average per pupil funding level still falls below what experts estimate it costs to provide a high-quality, full-day pre-k program¹⁷—and that's without taking into account the additional costs of Head Start's comprehensive services. There's no transparent data or research on how much Head Start programs spend on comprehensive services, nor are there well-designed studies estimating how much it costs to deliver these services effectively. But available data suggest the costs are significant. Time is an even more limited resource for Head Start youngsters—more than half of Head Start programs

serve children for only a partial day and/or week¹⁸—and activities like tooth-brushing, health screening, and so forth can take up a significant chunk of that time. Beyond its effect on time and money, Head Start’s current approach diffuses program leaders’ focus, forcing managers to focus on compliance rather than program improvement.

Head Start doesn’t just demand that programs support children’s comprehensive development; it’s often quite prescriptive about how they do so. As one Head Start operator says, “It feels like every small thing that might be helpful for families gets in the regs,” as a universal mandate. Head Start programs, for example, must provide parents and children with pedestrian safety training within the first 30 days of the program year.¹⁹ Detailed requirements like this provide programs with little flexibility to customize services or reallocate resources in response to their communities’ and families’ needs.

Moreover, there is very little evidence underlying many of Head Start’s requirements. Research tells us that young children’s development is integrated, and that all the developmental domains impact one another and children’s school readiness. But it’s a long jump from this finding to mandating specific services and interventions. In the most comprehensive meta-analysis of early childhood programs, there was a strong negative relationship between providing additional services (often in Head Start programs) and improving cognitive outcomes, with smaller and mixed effects in other domains.²⁰

The evidence on Head Start’s health impact is also mixed. The Head Start Impact Study found substantial positive effects on dental care, but much smaller effects on children’s access to health insurance and general well-being—and these gains faded out over time. Some non-experimental evidence shows that Head Start has large long-term impacts on the incidence of chronic health conditions and obesity.²¹ But preschool programs that do not include comprehensive services also produced similar outcomes.²²

Beyond health care, the evidence base for Head Start’s comprehensive services drops off substantially. The Impact Study found few, small, and sometimes ambiguous effects on parenting practices—a finding that is consistent with other research on parent-focused early childhood and interventions more broadly. There is no rigorous research into the effects of Head Start’s engagement with parents on their job outcomes or their communities’ well-being.

Evidence and common sense tell us that parent engagement is critical to high-quality early childhood programs, but it’s much less clear what types of parent engagement have the greatest impact. Head Start mandates a unique parent-led governance structure. Each Head Start grantee must establish a Policy Council that is responsible for setting program policy

and strategy and making strategic, personnel, and program decisions. At least half of the policy council members must be elected from among Head Start parents. In addition, each Head Start center must have a Parent Committee composed of and elected by parents of children in the center. These structures are designed to ensure that Head Start parents have a voice in decisions about how Head Start programs are operated. While encouraging parental engagement is important, there are many ways programs can engage parents. And there is no evidence that Head Start's parent-led governance structure leads to better child outcomes or increases engagement for the vast majority of Head Start parents who do not serve on policy councils or parent committees. And maintaining these governance structures consumes significant time and resources that could potentially be used to engage parents in other—possibly more effective—ways.

None of this means that Head Start shouldn't seek to address children's comprehensive development or engage parents. Rather it argues for a degree of humility—and flexibility—in policy around how Head Start grantees do this. Programs should still be expected to support children's health and engage their parents, but there should be fewer specific mandates and more focus on outcomes. For example, Head Start programs must document that each family completes an individual family partnership agreement that includes family goals—but they are not required to show that these plans actually result in changes for families. Similarly, Head Start could maintain an emphasis on parent voice and representation without dictating a common governance structure for all programs.

Head Start's mission should be to even the playing field for our poorest children by preparing them for success in school and life. Everything that a Head Start grantee does in the realm of health, parent engagement, and community partnerships should be filtered through that lens.

Ultimately, Head Start's mission should be to even the playing field for our poorest children by preparing them for success in school and life—which means addressing all domains of school readiness. Everything that a Head Start grantee does in the realm of health, parent engagement, and community partnerships should be filtered through that lens. If an activity can't be directly connected to improving children's chances of success in school and life—either by research or by a grantee's understanding of the needs of the specific children it serves and the resources available to them in their community— then programs shouldn't do it—and they certainly shouldn't be required to.

IGNORING CURRICULUM

Head Start is much less prescriptive about how programs meet children’s educational needs. Head Start did not even have educational performance standards until its 1998 reauthorization, and the current educational performance standards remain very broad, focusing on general principles of developmentally appropriate educational practice for young children. Head Start does not have a national curriculum or set of approved curricula; grantees choose their own.

Researchers and early childhood experts increasingly recognize the critical importance of curriculum for early childhood education outcomes. But Head Start monitoring reviews pay little attention to programs’ curricula. Grantees must demonstrate that their curriculum is research-based and aligns with the Head Start Child Development Framework—but this is primarily an exercise in box-checking, satisfied through documentation that the major curriculum publishers provide. Monitoring reviews do not evaluate the depth at which grantees cover curricular content. Nor do they assess whether a program’s curriculum supports teachers in scaffolding instruction to meet students’ needs. While Head Start monitors now conduct observations of teaching quality using CLASS, these observations focus exclusively on the quality of teacher-child interactions, ignoring the content being taught.

In the absence of clearer standards or guidance about curriculum, most Head Start grantees have selected commercially published, broad-based developmental curricula, such as Creative Curriculum. Some 68 percent of center-based Head Start providers, and 87 percent of center-based Early Head Start providers, use Creative Curriculum, while most of the rest use the High/Scope curriculum.²³ These curricula provide teachers a framework for developmentally appropriate practices, as well as some lesson ideas and guidance in setting up their classrooms, but they do not zero in on the specific content, practices, and learning experiences that children most need to succeed.

Creative Curriculum is popular because it covers the full range of domains included in the Head Start Child Development Framework, is available for all the ages Head Start programs serve, and has an accompanying authentic assessment tool—Creative Curriculum GOLD. All these factors mean that programs can be reasonably confident that, if they use Creative Curriculum, they will meet Head Start Performance Standards. Existing evidence, however, suggests that Creative Curriculum—at least as currently applied in most Head Start and early childhood settings—is not particularly effective. The U.S. Department of Education’s What Works Clearinghouse, a federally funded initiative that reviews scientifically rigorous research on educational programs in order to provide guidance to practitioners and policymakers,

reviewed the existing research on Creative Curriculum and found “no discernible effects on oral language, print knowledge, phonological processing, or math for preschool children.”²⁴ While the broad instructional framework that Creative Curriculum provides can work well with highly trained and experienced teachers, it provides too little structure and support for the less-educated and inexperienced teachers in many Head Start and other early childhood settings.

Examples of more-effective preschool curricula are beginning to emerge, however. Head Start’s research advisory committee recently noted that “a growing research literature suggests that content-specific curricula that are tightly integrated with ongoing assessment and professional development systems are more effective in promoting specific outcomes than a more general curricular framework used alone.”²⁵ Early evaluations of the REDI preschool curriculum for language and social and emotional skills and the Building Blocks

curriculum for math suggest that these curricula produce student learning gains far exceeding the norms. Moreover, these gains do not appear to come at the expense of progress in other domains. In the large-scale trial of Building Blocks, not only did the group getting Building Blocks perform much better in math, but that group also performed better on three different measures of verbal and literacy skills.²⁶ In the Boston Pre-School Program, a curriculum focused principally on language, literacy, and math generated large gains in those areas but also modest gains in executive function.²⁷

“Content-specific curricula that are tightly integrated with ongoing assessment and professional development systems are more effective in promoting specific outcomes than a more general curricular framework used alone.”

Advisory Committee on Head Start
Research and Evaluation

University of Virginia education school Dean Robert Pianta, whose research led to the development of CLASS, has recently called for a shift in preschool quality improvement efforts—including Head Start’s—to focus less on piecemeal improvements in teacher professional development and program practices. Instead, Pianta argues that policymakers and researchers focus on developing comprehensive, evidence-based models of high-quality early childhood education that integrate proven curricula, assessments, and teacher support and can be replicated across a range of programs and organizations. Rather than relying on programs with limited capacity to create and implement their own improvement strategies, this approach would provide organizations with “turnkey” models that address all the critical aspects of early childhood practice. Pianta’s proposal has real promise, but these models have yet to be developed. In the meantime, efforts to improve outcomes in Head Start programs must devote increased attention to curriculum.

RETHINKING THE STATE ROLE

At a time when states are playing an increasing role in early childhood education, Head Start needs to be better integrated and aligned with state pre-k and child care programs. The state role in Head Start—or lack thereof—is an understandably touchy issue. When Head Start was created in the 1960s, it was deliberately designed to exist outside the then-segregated state public education system. Public education systems have evolved considerably since the 1960s, but there are still good reasons to remain suspicious of states when it comes to early childhood education. For one thing, many proposals to shift Head Start to the states—from the Nixon administration to U.S. Rep. Paul Ryan today—have been tied to an underlying goal of cutting federal spending on poor children.²⁸ Many conservative leaders today who talk about block-granting poverty programs are firmly committed to reducing federal spending on the poor. Further, states that gained authority for Head Start might use this authority to lower Head Start quality or cut spending. The significant cuts in early childhood spending that many states made in the last recession—many of which have yet to be restored—serve as a caution here.

Yet these understandable concerns cannot negate the simple fact that Head Start’s federal-local structure is mismatched to the early childhood and education landscape that exists today. Today, every state has established child care licensure regulations and provides child care subsidies for low-income working parents; 42 states have established state-funded pre-k programs; and the state role in K-12 education has dramatically increased.

Over the past decade, states have also surpassed the federal government in expanding early childhood programs. During these years, Head Start’s enrollment has increased by about 50,000 to serve a total of 956,000 children. In the same period, enrollment in state pre-k programs skyrocketed to 1.3 million, surpassing Head Start enrollment. While quality and funding for these

programs varies widely, states like Oklahoma and New Jersey now run large-scale preschool programs that achieve results that appear stronger than Head Start's.

As many states seek to expand their early childhood programs, integrate fragmented early learning services, and strengthen alignment between early childhood programs and K-12 schools, Head Start's unique federal-local structure sometimes creates obstacles. States have limited authority to compel Head Start programs' participation in these efforts. Even when—as is often the case—states successfully persuade Head Start programs to take part in these systems, the persistence of different child eligibility and program quality standards for different programs can undermine efforts to build an integrated system.

The existence of separate state and federal funding streams also undermines efforts to combine programs in order to better serve children. Because Head Start and state pre-k are typically funded for less than the full day that many working parents need, many early childhood providers seek to combine (or “braid”) multiple funding streams in order to extend the school day and improve quality. Early childhood centers that are part of the Educare network, for example, use Early Head Start and Head Start grants as their primary funding base but combine these funds with state pre-k and child care subsidies to cover the higher costs of providing a high-quality, full-day program. But these efforts are greatly complicated by the existence of different program quality standards and eligibility requirements across funding streams. Similar organizations without Educare's experience, back office, and philanthropic funding sources do not even try.

Head Start's direct federal-to-local oversight structure creates real challenges for operations. Outside of the military, the federal government does not maintain such a high degree of operational control over anything close to an \$8 billion, 1,600-grantee program. Job Corps is the closest analogy, and it is about a quarter as large. The Office of Head Start lacks sufficient staff or capacity to effectively oversee these programs. Programs face delays when they need to get approval for equipment or construction expenses, which require greater federal scrutiny, or when they want to shift funds from Head Start to Early Head Start. Designation renewal has placed increased demands on the Office of Head Start without increasing the office's capacity, contributing to a slow and opaque process. A 2005 U.S. Government Accountability Office report raised concerns about duplicative and uncoordinated monitoring systems within HHS, widespread noncompliance with financial management standards, and a failure to terminate grants in cases of persistent problems.²⁹ HHS has made genuine progress in addressing these concerns, but to some degree, they are endemic to federal management of a sprawling program.

The threat of block-granting Head Start and concerns about potential state abuses have made it difficult for policymakers and early childhood advocates alike to consider increasing the state

role in Head Start. But there is a broad middle ground between block grant proposals—which would give states Head Start funds with little accountability for how they used them to serve children—and the status quo.

States as diverse as New Jersey, North Carolina, and Oklahoma have shown that high-quality early childhood programs can sustain bipartisan support. Giving such states a greater role in overseeing Head Start programs has the potential to enhance the integration of Head Start, pre-k, and other funding sources, in ways that improve services for children and families. Well-designed policies could even leverage new state funds for the program. Although the track record of many states does not encourage similar confidence, there's no reason to treat all states the same.

States should be permitted to take on a greater role in Head Start only if they meet a very rigorous set of criteria demonstrating both a historic track record of supporting quality early childhood education and a forward-looking plan to expand access to high-quality services.

These criteria would include:

- The state has an existing, high-quality state pre-k program that serves a significant percentage of low-income students and meets or exceeds Head Start's standards for teacher qualifications and class sizes; monitors program or provider quality on a regular basis using CLASS or another valid and reliable instrument; and has been subject to a rigorous independent evaluation demonstrating positive impact on children's school readiness.
- The state has a demonstrated track record of investment in early childhood services over the past decade, including sustaining or increasing aggregate funding for early care and education programs over the past five years.
- The state has a clear plan to use increased oversight of Head Start as part of a broader strategy to achieve statewide goals and targets for:
 - increasing low-income preschoolers' access to high-quality early learning services,
 - aligning early-learning and K-12 systems, and
 - improving school readiness, health, and other specific outcomes for children and their families.
- The state has established clear milestones, timelines, and targets for achieving these goals, to which it agrees to be held accountable as a condition of the increased oversight authority.
- The state has a clear plan for ensuring the quality of Head Start grantees under its oversight.
- The state has committed increased financial resources to enable it to achieve these goals. The required match for states that already serve all or most preschoolers in state-funded preschool would be lower than for states that currently serve fewer students.

WHY SHIFTING HEAD START TO A 0-3 PROGRAM DOESN'T SOLVE THE PROBLEM

Some reformers have suggested that the solution to Head Start's challenges is to shift the program's focus to 0-3-year-olds, letting states take the lead on pre-k. While there is clearly a need for more high-quality infant and toddler programs, refocusing Head Start on this age group is not necessarily a solution.

It will be years—if not much longer—before federal and state investments in pre-k expand to the point of serving all the 3- and 4-year-olds who need early learning. Until that happens, Head Start must continue to play a key role in serving the most disadvantaged 3- and 4-year-olds, particularly in the 10 states that do not have state-funded pre-k programs. Moreover, transitioning Head Start's existing preschool programs to effectively serve infants and toddlers would be a Herculean task that would require either replacing existing grantees or dramatically changing how they operate.

This gets to the key issue: Shifting Head Start's focus to infants and toddlers does nothing to address the fundamental problems—lack of clear goals and performance measures, a focus on compliance over outcomes—that weaken Head Start today. It simply shifts them to a younger population. Research on the impact of Early Head Start finds results no better than those of Head Start. Shifting Head Start's focus to infants and toddlers resolves concerns about Head Start effectiveness only if you believe that results matter less for infants and toddlers.

Rather than simply kicking the can to a younger age group, federal policymakers must address the fundamental issues that keep Head Start from achieving its full potential impact for at-risk youngsters. The recommendations in this paper would improve Head Start performance whether the program continues to focus primarily on 3- and 4-year-olds or increasingly serves infants and toddlers.

To ensure that states continue to meet their fiscal commitments to early care and education, even if state leadership changes, any state that received oversight would be subject to strong “maintenance of effort” requirements for its early childhood spending, for which it would be held accountable going forward.

Given the relative rigor of these criteria, very few states—fewer than five—would meet them in the short term, leaving most Head Start programs under federal oversight. A pilot in a small number of states would enable state experimentation, allowing federal policymakers to learn how an increased state role in Head Start might work in practice and to determine whether the approach produces improved results that merit expansion to additional states. Any such pilot should be subject to rigorous independent evaluation to identify impacts and lessons learned. Limiting the pilot to a small number of states with demonstrated commitment to quality early childhood education, and requiring them to meet strong maintenance of effort criteria, would also help to protect against the legitimate concerns about transferring Head Start funding and oversight to the states.

A further protection against such concerns might be to give Head Start grantees in pilot states a choice: Opt into oversight by the pilot state, or continue under federal oversight. Providers that opted into state oversight would be relieved of many of the specific requirements in the federal performance standards, allowing the states to step into that regulating role, defining what the programs must do, including standards, curriculum, assessment, and licensure requirements. But providers that were happy with federal oversight could remain under it. Once a provider made a choice, it would stay under either federal or state oversight until the end of its five-year grant term. This approach would create an incentive for states to offer something of value to Head Start providers that come under their oversight, such as access to increased state funding, help with blending and braiding state and federal funding streams, increased technical assistance and support for quality improvement, or less cumbersome bureaucratic oversight processes. (The pilot application process, which would require states to demonstrate plans to ensure quality of Head Start grantees, would ensure that states could not attract Head Start providers simply by setting lower standards.)

Programs under state oversight would not be subject to the federal designation renewal system, but could lose their grants in accordance with state rules, including the state's own systems for replacing grantees. Pilot states, in turn, would be accountable to the federal government for their overall performance in improving program quality and children's school readiness, according to the goals set in their pilot application.

A more modest interim possibility would be to allow states to compete for Head Start grants where the current grantee has been identified for designation renewal. Current law allows a variety of entities—including nonprofit, faith-based, and for-profit local organizations—to serve as Head Start grantees, but precludes states from doing so. Under this proposal, a state that won a Head Start grant competition in designation renewal would be able to receive Head Start funds directly to serve children in the service area through its state pre-k program so long as the state ensured that children continue to receive any other comprehensive services required by Head Start. Most states would not operate their new Head Start programs directly, but through one of the range of district and community-based providers in their existing pre-k programs. States would still be accountable for the quality and outcomes of their Head Start programs, including ensuring that the delegate agencies meet all Head Start requirements. Maintenance of effort and other requirements to prevent states from using state funds to reduce their own commitments would also apply.

This approach would enable states to better integrate Head Start services in their communities with their other early childhood programs, and would also expand the range of potential applicants for grants identified for designation renewal. It also has a precedent: Although no states currently operate Head Start programs, Pennsylvania has received an Early Head Start grant.

These are only a few potential ideas for how to increase the state role in Head Start, offered to demonstrate that increasing the state role need not mean block-granting and to stimulate discussion about strategies for enabling responsible states to play a larger role in Head Start—and hopefully generate better ones.

THE WORLD HAS CHANGED

When Head Start was conceived in the early 1960s, public policies in many states routinely denied basic rights to minorities. There was no Medicaid, no Children’s Health Insurance Program, no Affordable Care Act, and no community health centers as a backstop alongside public hospitals. Head Start’s architects also lacked access to the rich knowledge about early childhood learning, brain development, and language and literacy that has been produced in the past 50 years.

Head Start’s creators designed the program in ways that made tremendous sense at the time. They ensured that the federal government directly funded services at the community level, regardless of the wishes of state or local officials, and outside the segregated public school system. In keeping with the War on Poverty ethic of “maximum feasible participation,” they emphasized empowering local leaders and giving program beneficiaries—typically parents—an active role in running programs, as employees or in volunteer governance roles. And they decided that Head Start would offer an array of health, nutrition, and family services, as well as education, to address poor children’s many needs.³⁰

While these early decisions had a powerful logic, their drawbacks have emerged as the country has changed. Head Start continues to require a wide array of services, from child health to education to parental training to community empowerment, without prioritizing those that are most likely to change children’s life trajectories. The federal government requires programs to follow an array of detailed procedures but places much less emphasis on Head Start results. And Head Start’s unique federal-local structure has positioned the program outside states’ emerging early childhood systems. Each of these factors creates challenges for Head Start in today’s evolving policy landscape.

RECOMMENDATIONS

Experience with designation renewal to date has suggested that the policy is producing benefits—but could be improved in a variety of ways. At the same time, Head Start also needs broader structural reforms. The following recommendations address both issues:

MAXIMIZE THE EFFECTIVENESS OF DESIGNATION RENEWAL

- **Increase transparency in the Head Start monitoring and designation renewal processes:** Following the lead of other federal grant competitions like the U.S. Department of Education's Race to the Top and Investing in Innovation programs, designation renewal should be more transparent. HHS should release the criteria it uses to score applicants, the guidance it gives to reviewers in scoring different applications, and information about the number of applications received for each funding opportunity and the scores received by those applications. HHS should also release scores and comments to the applicants themselves.
- **Prioritize performance and innovation in the designation renewal process:** The Office of Head Start's designation renewal application repurposed its old application form but retained its compliance focus. HHS should develop a new application that consolidates and simplifies questions about program compliance in order to place more emphasis on applicants' track records of successfully serving children, the results they seek to achieve, and benchmarks for measuring progress toward those results. It should also specifically invite programs to implement innovative, research-based practices to improve child outcomes. In seeking information on past performance, the Office of Head Start should

- make clear that it will value past success in serving disadvantaged children in both Head Start and non-Head Start contexts. Applicants with past problems, inside or outside Head Start, should be required to explicitly disclose and discuss those challenges. To aid reviewers in evaluating these issues, HHS or the applicants should provide reviewers with past monitoring reports for existing grantees.
- **Encourage new providers:** To achieve its full potential, the designation renewal process needs to attract new, high-quality providers to Head Start. The FY2014 appropriations act included \$25 million to help new Head Start grantees after they receive an award, but building the pipeline of quality providers requires investment earlier in the process, when potential applicants are deciding whether to pursue a grant. Federal seed funding could play an important role here. The federal Charter Schools Program, for example, has provided more than \$2.3 billion since 2001 in funds to support the start-up costs for new charter schools and to help scale the most effective charter organizations. Federal policymakers could play a similar role in seeding the growth of new, high-quality Head Start providers. To maximize the impact of funds, application criteria should be rigorous, competitive, and focused on organizations with a demonstrated track record of success in serving disadvantaged children. Federal grants should also require a significant non-government match, to attract to Head Start more of the philanthropic investment that has been so critical to K-12 education reform.
 - **Plan for transition:** The transition challenges facing new grantees are not surprising—Head Start was not designed with grantee turnover in mind. But if turnover in providers is going to be more common in the future—as designation renewal assumes—then the Office of Head Start needs to develop strong systems and procedures for close-out of existing grantees, the stand-up of new ones, and the orderly transition of children, records, and assets in the event of a grantee transition. This may also require policy changes.

SET CLEAR GOALS AND MEASURE PROGRAM PERFORMANCE

- **Establish clear metrics of program performance at the grantee level:** As discussed above, Head Start needs a much more robust way of differentiating grantee performance. This requires developing one or more performance frameworks for Head Start grantees that incorporate multiple data points rather than relying on a single metric or test score. Because identifying the right mix of measures is both politically controversial and technically complex, Congress or the administration should charge the National Research Council with identifying a set of common, valid, and reliable metrics that could be used to evaluate the performance of Head Start grantees across multiple domains, and making

recommendations for combining these metrics into a performance framework.³¹ These metrics should include measures of both program quality (such as CLASS) and child outcomes. At a minimum, they should include measures related to children's language, early literacy, early math, and social-emotional development, as well as other measures shown to have a predictive relationship with later-life outcomes for children or their parents. HHS could also allow grantees to select additional "mission specific" metrics that have particular importance for their program and community goals, provided those metrics meet standards for validity and reliability. Over time this "planned variation" approach would allow HHS and researchers in the field to learn more about what works and doesn't work in evaluating performance of early childhood education programs.

- **Expand analysis of Head Start performance data:** The Office of Head Start currently collects a wealth of program, budget, and other data from grantees. But the data are not systematically analyzed to identify trends or drive continuous improvement. Analyzing data about how Head Start grantees currently use funds, or the potential relationships between uses of funds and quality measures such as CLASS, could answer critical questions including but not limited to: "How much do programs spend on education, health, family engagement, and other services?"; "What types of curricula and assessments do Head Start programs use?"; and "Is there a relationship between programs' choices about resource allocation, curriculum, or program model and the quality of services they provide?" Transparent information about program performance and funds could also support program improvement, by enabling OHS staff, Head Start grantees, and experts to study how the most effective grantees use their funds and share that information with other operators. The next reauthorization of Head Start should either require OHS to make greater use of the data it collects—and provide resources to do so—or fund a competitive grant program for independent researchers to undertake analysis, and require OHS to collaborate with these researchers.
- **Continue to increase transparency of monitoring reports:** The Office of Head Start began posting online monitoring reports, including CLASS scores where available, for all Head Start grantees reviewed in 2012. While this information can be hard for lay readers to find and understand, it does provide some increased transparency around Head Start performance—particularly in the case of grantees that have significant weaknesses. Parents, policymakers, and the broader public should have access to this data. OHS should continue to make Head Start monitoring reports, including CLASS scores, publicly available online. It should also consider ways to make these reports more user-friendly and informative to parents and other stakeholders, for example by including a brief, jargon-free bulleted list of a program's strengths and weaknesses on the cover page of each report.

INCREASE FLEXIBILITY TO INNOVATE

- **Revise the Head Start Performance Standards:** Head Start needs standards, but it does not need 2,400 of them. The Head Start Performance Standards were last revised in 1998—and much has changed since then. HHS has the authority to revise the standards through its regulatory authority, and is currently working to do so. As it revises its Performance Standards, OHS should take a bold approach, eliminating requirements that are overly prescriptive or lack a strong research base. Dramatically streamlining the performance standards will enable programs to focus less on compliance and more on improving outcomes for children and families.
- **Allow grantees to apply for waivers:** Head Start should foster innovation by allowing grantees to apply for waivers of specific program standards when they renew their five-year contracts. HHS should track information on waiver requests to help it identify the performance standards that are creating the greatest obstacles to programs' efforts to serve children effectively. (Waivers should be prohibited for the most essential performance standards.)
- **Rethink the matching requirement:** Head Start currently requires grantees to demonstrate non-federal contributions equal to 20 percent of the total program budget. Many federal programs have established non-federal matching requirements as a way to leverage local, state, or philanthropic funds and ensure that grant recipients have “skin in the game” for the work. Head Start’s matching requirement, however, allows a very broad range of “in-kind” contributions to be counted toward the matching requirement, creating an imperative for programs to seek out such contributions even when the goods or services provided do not add real value to their programs. Policymakers should consider overhauling Head Start’s matching requirement so that it focuses on leveraging local, state, and private resources that enhance the impact of Head Start programs—which may mean reducing the amount of the required match, increasing the use of waivers, or setting the match on a sliding scale based on the relative economic prosperity of the area a program serves. In Detroit, for example, a group of local funders came together to commit matching funds for Head Start agencies applying for Birth-to-Five Pilot grants. The matching funds will focus on quality improvements, allowing programs to make investments in technology and professional development that they would not otherwise be able to afford. Federal policymakers should more actively seek to leverage this type of partnership.

EXPLORE A STATE ROLE IN HEAD START

As described above, it is possible to give states a greater role in Head Start without resorting to block-granting the program. Possible options include:

- Allowing states to apply to become Head Start grantees
- Giving states with a demonstrated track record of delivering quality preschool greater oversight over Head Start in their states, accompanied by strong quality standards and maintenance of effort requirements for these states.

These are only a few of many potential options. It is time for a broader conversation about how states can and should play a productive role in improving Head Start access, quality, and outcomes. Federal policies to increase pre-k or other early childhood funding streams ought not to move forward without seriously addressing the question of how these programs can best engage with Head Start.

CONCLUSION

Realizing these policy recommendations will be challenging, from both a political and an implementation perspective. Yet our nation's most disadvantaged youngsters deserve nothing less.

As our nation's largest preschool program—and the only one exclusively focused on the poorest children—Head Start plays a critical role in our nation's early learning and development system, and it will continue to do so. As policymakers seek to extend the benefits of quality preschool to more children, improving Head Start must be part of these efforts. The good news is that significant progress is under way: Since 2007, the implementation of CLASS has raised standards for teaching and program quality in Head Start programs. Through designation renewal, Head Start has ended contracts with low-performing operators. And the Birth-to-Five Pilot is enabling Head Start grantees to allocate resources more efficiently and create seamless birth-to-five early learning experiences for children.

There is still much that needs to be done, however, to ensure that all Head Start students are prepared to succeed in school and life. These recommendations offer a starting point for enabling more Head Start programs to meet this goal.

ENDNOTES

¹ House Budget Committee Majority Staff, "The War on Poverty: 50 Years Later" (committee report, Washington, DC, March 3, 2014).

² Russ Whitehurst, "Is Head Start Working for American Students?" *Brookings Up Front Blogs*, January 21, 2010, <http://www.brookings.edu/blogs/up-front/posts/2010/01/21-head-start-whitehurst>.

³ David Deming, "Early Childhood Intervention and Life-Cycle Skill Development: Evidence from Head Start," *American Economic Journal: Applied Economics* 1, no. 3 (2009), http://www.people.fas.harvard.edu/~deming/papers/Deming_HeadStart.pdf. Similarly, Doug Miller and Jens Ludwig found that counties that were given help applying for Head Start during the 1970s had significantly higher high school graduation rates than counties that were not. Jens Ludwig and Douglas L. Miller, "Does Head Start Improve Children's Life Chances?" *The Quarterly Journal of Economics* 122, no. 1 (2007), <http://qje.oxfordjournals.org/content/122/1/159.abstract>.

⁴ If Head Start did not exist, children who are currently in low-quality care could also be worse off. Some researchers have hypothesized that Head Start fade-out occurs because teachers in the public schools focus on remediating the children who participated in lower-quality programs and enter school behind their Head Start peers. If that is true, then without short-term gains that children post as a result of Head Start, the remedial tasks before kindergarten teachers in low-income schools would be even greater. There would be less opportunity to focus on the needs of the children who received the fewest services before school, because the children not enrolled in Head Start would have joined them.

⁵ Steve Barnett, "Reforming Early Education" (presentation at the Brookings Institution, Washington, DC, August 22, 2011), http://www.brookings.edu/~media/events/2011/8/22%20early%20education/20110822_barnett_presentation.pdf; Christina Weiland and Hirokazu Yoshikawa, "Impacts of a Prekindergarten Program on Children's Mathematics, Language, Literacy, Executive Function, and Emotional Skills," *Child Development* 84, no. 6 (2013), doi: 10.1111/cdev.12099.

⁶ Jimmy Leak, Greg J. Duncan, Weilin Li, Katherine Magnuson, and Holly Schindler, "Is Timing Everything? How Early Childhood Education Program Impacts Vary by Starting Age, Program Duration and Time Since the End of the Program" (paper presented to the Association for Policy Analysis and Management, Boston, Mass., November 4-6, 2009), http://www.gse.uci.edu/docs/Leak_Duncan_Li_Timing_Paper_APPAM_102810.pdf.

⁷ "Acelero Learning 2011-2012 Annual Report," Our Results, Acelero Learning, <http://www.acelero.net/index.cfm?fuseaction=Page.ViewPage&pageId=510>.

⁸ Coats Human Services Reauthorization Act of 1998, PL. 105-285.

⁹ 42 USC 9801 et seq., Sec. 648A.

¹⁰ 42 USC 9801 et seq., Sec. 642B

¹¹ 42 USC 9801 et seq., Sec. 641A.

¹² These 130 grantees held 132 separate Head Start grants, because two grantee agencies held both a regular Head Start and Migrant Head Start grant. One of the 130 grantees was eventually removed from the competition because its deficiency had been removed.

¹³ Government Accountability Office, "Head Start: Comprehensive Approach to Identifying and Addressing Risks Could Help Prevent Grantee Financial Management Weaknesses" (GAO-05-176, Feb. 28, 2005).

¹⁴ Mashburn et al., at 746. CLASS's creators have pointed this out in their own research: In a key 2008 paper, a one-point increase on the instructional support scale (from 2 to 3 or 3 to 4, for example) was associated with a change in standardized achievement assessments of less than 0.10 standard deviations. The authors characterized this effect as "relatively small" and noted that it was "significantly different from zero as a result of the large sample size included in this study."

¹⁵ Sebastian P. Suggate, Elizabeth A. Schaughency, and Elaine Reese, "Children learning to read later catch up to children reading earlier," *Early Childhood Research Quarterly* 28, no. 1 (2013), doi: 10.1016/j.ecresq.2012.04.004.

¹⁶ Head Start Performance Standards, Sec. 1304.22.

¹⁷ Estimated Head Start annual spending per child served: \$7,764; Average state pre-k spending: \$4,596. Steve Barnett, Megan Carolan, Jen Fitzgerald, and James Squires, "The state of preschool 2012: State preschool yearbook," National Institute for Early Education Research, New Brunswick, NJ, http://nieer.org/sites/nieer/files/yearbook2012_executivesummary.pdf. Estimated cost to provide high-quality pre-k: \$8,313. "New Tool Costs Out Quality Pre-K," 2014, National Institute for Early Education Research, <http://nieer.org/publications/new-tool-costs-out-quality-pre-k>.

¹⁸ "Head Start Program Facts: Fiscal Year 2013," Head Start: an Office of the Administration for Children and Families Early Childhood Learning & Knowledge Center (ECLKC), <http://eclkc.ohs.acf.hhs.gov/hslc/mr/factsheets/docs/hs-program-fact-sheet-2013.pdf>.

¹⁹ 45 CFR 1310.21(a).

- ²⁰ Gregory Camilli, Sadako Vargas, Sharon Ryan, and W. Steven Barnett, “Meta-analysis of the effects of early education interventions on cognitive and social development,” *Teachers College Record*, 2010;112(3):579-620, <http://www.tcrecord.org/content.asp?contentid=15440>.
- ²¹ Pedro Carneiro and Rita Ginja, “Long Term Impacts of Compensatory Preschool on Health and Behavior: Evidence from Head Start,” Working Paper 2012/6 (Uppsala University, 2012), http://www.ucls.nk.uu.se/digitalAssets/136/136570_20126.pdf.
- ²² Clive R. Belfield, Inas R. Kelly, “Early Education and Health Outcomes of a 2001 Birth Cohort,” *Economics and Human Biology* 11, no. 3 (2013), doi: 10.1016/j.ehb.2012.05.001.
- ²³ Advisory Committee on Head Start Research and Evaluation, “Final Report,” (report submitted to the Secretary of the U.S. Department of Health and Human Services, Washington, DC, August 2012), http://www.acf.hhs.gov/sites/default/files/opre/eval_final.pdf, p 44.
- ²⁴ “The Creative Curriculum for Preschool, Fourth Edition,” March 2013, What Works Clearinghouse, U.S. Department of Education, <http://ies.ed.gov/ncee/wwc/interventionreport.aspx?sid=512>.
- ²⁵ Advisory Committee on Head Start Research and Evaluation, “Final Report,” (report submitted to the Secretary of the U.S. Department of Health and Human Services, Washington, DC, August 2012), http://www.acf.hhs.gov/sites/default/files/opre/eval_final.pdf. See also <http://fcd-us.org/sites/default/files/Evidence%20Base%20on%20Preschool%20Education%20FINAL.pdf>, at note 24 (global curricula show “no or small gains” compared with other commercial curricula or teachers’ own curricula); Karen L. Bierman, Celene E. Domitrovich, Robert L. Nix, Scott D. Gest, Janet A. Welsh, Mark T. Greenberg, Clancy Blair, Keith E. Nelson, and Sukhdeep Gill, “Promoting Academic and Social-Emotional School Readiness: The Head Start REDI Program,” *Child Development* 79, no. 6 (2008): 17, doi: 10.1111/j.1467-8624.2008.01227.x.
- ²⁶ Doug Clements, “The Building Blocks of Math: Lessons from Research,” (presentation, March 17, 2012), http://2012.eetconference.org/wp-content/uploads/Building_Blocks_of_Math.pdf.
- ²⁷ Christina Weiland and Hirokazu Yoshikawa, “Impacts of a Prekindergarten Program on Children’s Mathematics, Language, Literacy, Executive Function, and Emotional Skills,” *Child Development* 84, no. 6 (2013), doi: 10.1111/cdev.12099.
- ²⁸ Eloise Pasachoff, “Block Grants, Early Childhood Education, and the Reauthorization of Head Start: From Positional Conflict to Interest-Based Agreement,” *Georgetown Public Law and Legal Research Paper* 11, no. 127 (2006): 354-7, <http://scholarship.law.georgetown.edu/cgi/viewcontent.cgi?article=1692&context=facpub>.
- ²⁹ GAO, op. cit. (2005).
- ³⁰ Edward Zigler, *The Hidden History of Head Start* (New York: Oxford University Press, 2009), Chapter 2.
- ³¹ Advisory Committee on Head Start Research and Evaluation, op. cit. (2012).