

Monitoring Redesign Task Force 2016 Report

Summary

The Monitoring Redesign Task Force 2016 (MRTF16) maintains the overall recommendations made by the Monitoring Task Force 2012 (MTF12). MRTF16 recommends the continued development of a dashboard risk management and key indicator tools that leads to differentiated monitoring and T/TA and the expanded use of program annual audits to monitor compliance with standards. MRTF16 has included revisions to the original recommendations throughout.

MRTF16 applauds OHS new standards and the emphasis on flexibility and continuous quality improvement. We are excited about the possibility of developing a monitoring system that assures basic program functioning and compliance with the Head Start standards, AND that is strength based, that is collaborative, and that recognizes and rewards high quality programming.

New to this position is that the HSPPS should not be seen as basic compliance standards. Head Start is a premier early education program that set us apart from many other early childhood education subsidized programs. Our basic compliance is QUALITY. This must be continually emphasized.

MRTF16 believes that the Dashboard, Critical Success Indicators (CSIs), and onsite monitoring protocol should be the foundation of the first phase of a new monitoring system. Together, these elements will evaluate quality, identify low performers, assist grantees in intentional quality improvement, and effectively target T/TA resources. The 2012 report proposed a second phase, the proposed Certification System that could be implemented as the mechanism for rewarding high performers. The MRTF16 feels strongly that the new system needs to recognize, celebrate and reward high quality Head Start programs. We believe that Certification System is one possible way this could happen, but are open to other ways of meeting this important goal.

We believe that meeting the Head Start standards is certification of quality.

In reviewing the 2012 report, MRTF16 sees these priorities for implementing a new monitoring system:

1. Identify CSIs by comparing the Head Start Program Performance Standards (HSPPS) requirements with practices that are indicative of long-term success.
2. Develop a dashboard system, including CSI measurements and process for review, as well as the development of corresponding targeted T/TA.
3. Collaborate with OMB to provide guidance on expanded A-133 audits. Evaluate acceptable substitutes for grantees that do not participate in the A-133 audit.
4. Align on-site Health/Safety reviews with *Caring for Our Children Basics*.
5. Convene early childhood care and education stakeholders to establish an inclusive vision for a Certification System that would reduce duplicative efforts through integrated monitoring.

Proposed Critical Success Indicators

MRTF16 maintains MTF12's recommendations for critical success indicators with updates to reflect the new HSPPS and with the exception of CSI #11, compliance with licensing.

Recommendations for Expanded Auditing

MRTF16 maintains the recommendation that the Office of Head Start expand the guidance for audits of Head Start programs to include areas of evaluation that are currently optional and other areas. MRTF16 has amended the proposed suggestions to exclude ERSEA information from this recommendation. MRTF16 would like to emphasize the critical importance that OHS provide detailed explanations or training opportunities for auditors to ensure they have a deep understanding of the purpose and function of Head Start programs. Expanded program performance auditing would reduce the amount of time and energy invested by OHS in on-site reviews by providing annual, independent documentation of each program's performance.

Recommendations for Expanded Auditing Implementation

MRTF16 maintains the following recommendations for implementation:

1. Involve stakeholders in the design of an expanded compliance supplement applicable both to A-133 audits and other types of common program audits.
2. Provide guidance for auditors to familiarize themselves with Head Start.
3. Create a procedure for timely review of audits and follow-up for programs with findings to address issues, support programs in resolving them, and take action if necessary.
4. Support regional offices in disseminating clear and consistent T/TA to programs about the changes to the auditing process.
5. Consider the varied needs of Tribal programs and those not typically evaluated with an OMB A-133 audit.

Certification System

MRTF16 maintains the assertion that there is a strong need to recognize and encourage high-quality performance. MTF12 proposed that the National Head Start Association (NHSA), the National Indian Head Start Directors Association (NIHSDA), the Migrant/Seasonal Head Start Association (MSHSA), the Office of Head Start, and partners working to serve young children at the community, state, and national levels collaborate to create a Certification System. The purpose of the Certification System would be twofold: to recognize high-quality programming and to advance an integrated monitoring system.

The System would allow grantees participating in the certification process to submit ratings, inspection reports, and licenses, substantially reducing duplicative efforts and assessments. Based on the crosswalk articulation, the grantee would receive aggregate scores for areas of performance. Ultimately, the Certification System would reward grantees' strengths and alignment with other systems through a certification that would allow for a schedule of differentiated monitoring. Adopting a Certification System affords Head Start and the early learning community opportunities to systematically coordinate, maximize resources, and inspire improvements in quality.

On-Site Monitoring Visits

Since the 2012 report there has been tremendous improvement in onsite monitoring, the recommendations of the report were implemented effectively by OHS. MTF12 proposed that OHS require annual health and safety inspections to assess compliance with health and safety standards. MRTF16 recommends that a more efficient, less time-consuming review replace the current protocol, perhaps in the form of sample classrooms, desk reviews. to reduce the burden on programs experiencing high numbers of on-site reviews. The Dashboard, alignment with *Caring for Our Children Basics*, and expanded use of A-133 audit should all be used to reduce on site monitoring. MRTF16 commends OHS's implementation of additional and/or unannounced visits to assist grantees with identified areas of concern.

Health and Safety Standards

At the time of MTF12, Head Start Health and Safety standards overlapped with the Stepping Stones standards in some areas but not others. MRTF16 does not support the use of Stepping Stones and instead supports the status quo monitoring of health and safety. Further, MRTF16 recommends the use of the *Caring for Our Children Basics* tool as a standard for assessing the quality of early learning programs.

Training and Technical Assistance

MRTF16 continues to believe that T and TA needs revision and greater involvement in the monitoring process. It support the 2012 report recommendations.

Training and Technical Assistance (T/TA) during implementation would focus on helping programs implement the dashboard and integrate it with the grantees' existing internal data and self assessment systems. Ultimately, however, T/TA would be targeted in two ways. First, programs would create their own improvement plans and request specific T/TA in order to meet targets. Secondly, OHS would use trends in dashboard data to efficiently identify programs in need of compliance support. These two methods are intended to make the most effective use of T/TA time and funding while preventing noncompliance and supporting program excellence.

MRTF16 recommends that OHS, via the National Centers, create a system to support program continuous quality improvement through establishing a feedback loop about key program processes that are essential to quality (for example, self assessment, community assessment, annual audit, T/TA plan, ERSEA, PIR data, family engagement outcomes, program annual report, and school readiness goals). Implementing this recommendation would create a clear, supportive mentoring relationship between Head Start programs and OHS to improve program quality.

State Quality Rating and Improvement Systems

There continues to be significant variation in Head Start's role in state Quality Rating and Improvement Systems (QRIS), both in terms of input and evaluation. A primary goal of the Certification System is to align and incorporate state and nationally recognized validating systems; as such, the Task Force intends for the proposal of a Certification System to complement the work being done to develop QRISs, not supplant it. Furthermore, the proposed Certification System would recognize how each state with a QRIS system validates programs' quality. For states just beginning to develop their QRIS or alignment, the System would serve as a strong basis for collaboration and integration.

Since 2012 the issue of how Head Start programs fit into their state QRIS systems has continued to grow as state QRIS systems become more complicated. In addition the new Head Start Standards requiring Head Start programs to participate in their QRIS system if it the system recognizes Head Start monitoring has put an even greater importance on the relationship between Head Start programs monitoring and state QRIS systems.

American Indian/Alaskan Native Head Start Programs

Unannounced Reviews Indian Law must be taken into consideration in the redesign of monitoring. Unannounced federal onsite reviews are not conducted due to the “government-to-government” relationship between the federal government and Sovereign Nations.

State Licensure The majority of AIAN grantees are not state licensed because state jurisdiction in the early learning and child care field is non-existent for AIAN grantees. A number of Tribes are located in multiple states’ areas and as a result are located within multiple state jurisdictions that have no or limited jurisdiction within “Indian Country.”

Federal Monitoring The system must be culturally relevant, responsive, and reliant. Incorporating culturally responsive and relevant practices should be a quality indicator.

Federal onsite reviews should not be limited to health and safety issues.

Audit Tribes’ annual single agency audits, or a comparable supplement, should be agreed upon by OHS in collaboration with AI/AN grantees, as well as NIHSDA, to ensure that these meet the requirements covered by the expanded A-133 audit.

Health and Safety For AI/AN grantees, the Indian Health Service or tribally operated environmental services perform health and safety inspections. OHS should collaborate with AI/AN grantees, as well as NIHSDA, to ensure that OHS’s efforts are not duplicative and that relevant CSI data is shared.

Migrant and Seasonal Head Start Programs

Any new system of monitoring must take into consideration programming that is often dictated by growing and harvesting demands and seasons, including short program years and uncommon hours of operation.

The self assessment should be included in the Dashboard and should serve as a basis for federal onsite reviews, informing target key indicators for conducting federal reviews. Federal reviews, then, would serve to verify and document grantees’ compliance with the Head Start Program Performance Standards.