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**Measuring Compliance and Continuous Improvement:**
**Toward Excellence for Head Start and Federally Funded Child Care**

**The Head Start Program***

Head Start, since its birth 48 years ago, has demonstrated creativity, innovation and capacity for rapid implementation and expansion. As a high quality, standards-based early learning program, Head Start has led the development of what is now called the early learning continuum and has influenced the development of Pre-K and QRIS programs. Building on the program’s proud history, it is important that Head Start plays a leadership role in efforts to define high quality service delivery and to ensure both compliance and excellence in serving young children.

Head Start and Early Head Start programs serve nearly a million young children and their families each year as part of America’s investment in comprehensive early childhood care and education for vulnerable children. These programs embrace accountability and the mission to provide high quality services to the children in their charge. Their efforts are overseen at the federal level by the Office of Head Start in the Administration for Children and Families and by the Office of Management and Budget; at the state level by Quality Rating and Improvement Systems, child care licensing agencies, workers’ compensation agencies and more; and at the local level by various regulatory agencies. While these monitoring systems are intended to make sure standards of care are met, their work is often duplicative and inefficient.

**Birth of the Task Force**

At a time when efficiency and effectiveness of monitoring are a focus across government agencies, the National Head Start Association (NHSA) led the development of a Monitoring Task Force to engage the Head Start field in a conversation about monitoring reform both for Head Start and for the larger realm of early childhood care and education. The Task Force was encouraged in its efforts by Linda Smith, Deputy Assistant Secretary and Interdepartmental Liaison for Early Childhood Development for the Administration for Children and Families (ACF), who welcomed suggestions of innovative, cost-effective and efficient approaches to monitoring across Head Start and child care. The Task Force was encouraged by Ms. Smith to consider “out of the box” options which might best serve the goals of ensuring compliance with laws and regulations as well as providing structures to encourage top quality services.

The Task Force committee thanks Ms. Smith for her leadership and openness to working with the Head Start community and the early learning community. Embracing and implementing these proposals will help create a brighter, less stressful future for Head Start programs and will also improve the lives of children and families.

**Community Survey**

The Task Force began by surveying the Head Start field - administrators, staff members, and parents - about the strengths and weaknesses of the current system and tools as well as how parents participate in those systems. Nearly one thousand responses were gathered. The most frequent feedback from participants was that while the Head Start monitoring system is effective at achieving health and safety for children, it is also inconsistent and often slow, and fails to support grantees in need of improvement. Administrators also reported that monitoring reform should prioritize consistency and recognition of excellence.

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* For the purposes of this paper “Head Start” is inclusive of Early Head Start, American Indian/Alaskan Native Head Start, Migrant and Seasonal Head Start, and the many creative and complex program models including home visiting and family child care partnerships.
Issues & Principles

After reviewing the field surveys, the Monitoring Task Force identified the following concerns as the basis for a
critical overhaul of the Head Start Monitoring System:

1. Monitoring is currently driven by compliance; it does not acknowledge, reward, or
   encourage improvement and excellence.
2. The system is not applied consistently across all regions, cultures, and individual
   programs.
3. Reliance on high-stakes triennial reviews has led to "teaching to the test" and dangerous
   three-year gaps in oversight.
4. The system includes expensive redundancies and does not integrate well with other early
   learning programs.
5. The vast amount of data collected is not effectively utilized or analyzed for program
   improvement.

Consequently, the Monitoring Task Force considered ways to create a system that:

1. Ensures accountability and compliance to federal administrators, while promoting
   accountability and excellence to communities.
2. Is consistent across regions and considers the varied needs of different populations.
3. Incorporates data from existing state and local systems, including licensing and QRIS, to
   avoid unnecessary duplication of effort.
4. Quickly and deftly responds to the training and technical assistance needs of programs.
5. Ultimately ensures the highest quality service to children and families as efficiently and
   effectively as possible.

The Task Force has worked to make recommendations inclusive of Head Start, Early Head Start, Migrant/Seasonal
and American Indian/Alaskan Native programs, as well as the complete array of settings and service delivery models
across the continuum of early childhood care and education.

Purpose of the Proposal

The purpose of this paper is to stimulate learning, discussion, and thinking, while ensuring the Head Start
community's participation in the ongoing, national discussion of how to improve the definition and monitoring of
quality and accountability in all early childhood settings – including Head Start. This paper reflects the ideas,
thinking and work of a broadly constituted Task Force. It represents work in progress and is by no means a final
product.

Proposal

The Office of Head Start (OHS) supports grantees, ensures program compliance and promotes excellence. Through
its critical role of creating regulations, policies and standards, OHS creates the foundation that defines Head Start
through compliance with the Performance Standards. The Task Force expects OHS to continue in this role. With
the intent of improving both compliance and the pursuit of excellence, the Monitoring Task Force proposes that the
current monitoring process be replaced by two distinct but connected systems. The first, Program Standards and
Performance Auditing, would ensure program compliance with the Head Start Performance Standards using three
major monitoring tools. The second, Joint Commission for Performance Certification, would create an objective body to define high quality programming and certify the level of quality programs are providing. These systems would incorporate monitoring data at the local, state and federal levels and reduce duplication of effort. Eventually, these could replace the triennial review, leading to a more balanced approach to monitoring programs that also positions Head Start, locally and nationally, as an accountable and energetic partner in the early learning and child development spectrum.

**Program Standards and Performance Auditing**

Every day, Early Head Start and Head Start programs are held to explicit, high-quality standards - and meet them. Compliance with these standards is necessary for the health and safety of children, but the Task Force recommends several changes that will reduce duplication of monitoring components and support targeted training and technical assistance for the programs that need it most. The Task Force recommends the creation or expansion of three monitoring tools, to be overseen by OHS. They are: a) increased web-based documentation of program data and outcomes using a “dashboard,” b) expanded use of auditing and annual assurances, c) on-site monitoring visits.

**Dashboard and Document Review**

The Task Force proposes the use of an online tool using a risk-based assessment model. Using an Applied Strategic Planning model, the Task Force proposes creating a set of measures that are Critical Success Indicators (CSIs). CSIs are a small number of measures that would be tracked on a periodic basis so OHS could work proactively to support programs in maintaining compliance. The Task Force recommends OHS consult with researchers and practitioners to determine a final list of CSIs. These may replace data collection currently conducted through the PIR. Possible CSIs include:

- Percentage of Full Authorized Child Enrollment
- Percentage of children meeting necessary health targets
- Budget to actual targeted expenditure levels
- Percentage of Child Outcomes targets achieved
- Percentage of Family Engagement targets achieved
- Average daily attendance
- Percentage turnover of enrolled children
- Status of required reports to OHS/State licensing/ etc.
Regular reviews of the dashboard by OHS would indicate when and where quick focused intervention is needed to ensure a grantee meets expected performance levels.

There are national and state examples of this “Dashboard” approach in identifying key indicators. California’s New Directions Approach (New Directions CA CCLD, 2012) is developing key indicators for all their human services as part of a comprehensive study undertaken by the Institute of Social Research at the California State University at Sacramento. Another thorough and well-documented approach is being undertaken in the State of Washington in their Office of Early Learning, regarding child care (Hyde, 2011).

At the national level, the National Association for Regulatory Administration (NARA) uses a Key Indicator Approach in their Licensing Curriculum (2000) and has a portion of their website focusing on this approach (NARA, 2012); the National Association for Child Care Resource and Referral (NACCRRA) has used a key benchmarking approach that builds upon the “Key Indicator” methodology and has published bi-annual report cards on how well the states meet these national benchmarks (NACCRRA, 2007, 2009, 2011) for centers and homes (NACCRRA, 2008, 2010, 2012); and the National Resource Center for Health and Safety in Child Care (NRC) has developed a focused set of standards from a much larger and more comprehensive set of standards called Stepping Stones (AAP/APHA, 1995).

In addition to the Dashboard and CSI data being used for ongoing risk management assessment and program improvement, the Task Force recommends that OHS create a web-based system to document program outcomes, starting with school readiness and family engagement outcomes. This web-based system would make it possible to create data-based national, regional and state reports documenting the effectiveness of Head Start programs. This system could be designed to interact with state-based longitudinal data systems and to accept data from programs’ data management systems. This would reduce the data entry workload for programs. It would also create a uniform method for importing Head Start data into state longitudinal data systems.

The Task Force also recommends Office of Head Start take uniform best practices that are already happening in some parts of the country and make them into a system to support program improvement through establishing a regular annual assessment and feedback loop for key program processes essential to quality (e.g. self assessment, community assessment, annual audit, TTA plan, ERSEA, PIR data, Family Engagement outcomes, Program annual report, School readiness goals, and the program’s grant). Each of these processes would be assessed by OHS staff annually using national assessment tools. The results of these assessments would be discussed with the grantees, creating a feedback loop to programs assisting them in improving quality. It would provide OHS with a uniform, consistent internal method for assessing program quality and assisting TA and professional development, while creating the foundation for a mentoring relationship between OHS and programs. Implementing this recommendation would create a clear, supportive mentoring relationship between Head Start programs and OHS based on trust and collaboration to improve program quality.

Program Performance Auditing
Head Start programs are required to undergo numerous audits outside of Office of Head Start monitoring, including but not limited to:

1. Annual A-133 audit by an independent CPA/auditor
2. Review of A-133 audit by the Office of Management and Budget (OMB) Federal Audit Clearinghouse
3. USDA monitoring site-based audits
4. State and local inspections and audits
The A-133 process, also known as the Single Audit, is mandated for all federally funded programs receiving $300,000 or more and is overseen by the Office of Management and Budget (OMB). The process encompasses both financial and program compliance components. This full spectrum view provides an objective evaluation of the corporate and programmatic capability of the grantee. The federal funding agency (Office of Head Start) has the ability to submit guidance for the audit process, including examination of targeted risk factors, specific formulaic projections, compliance with local regulatory bodies, and targeted sampling.

The Task Force recommends expanding use of the annual A-133 audits to ensure program compliance with not only financial statements but also with Head Start performance standards including non federal share, ERSEA, record keeping, etc. By optimizing the full use of the A-133 audit OHS would have an accurate and timely view of on-going grantees viability. Grantees are currently paying for auditing services as an allowable expense.

A possible operational framework for using A-133 auditing might follow the progression in Figure 2.

**On-Site Monitoring Visits**

The Task Force proposes that OHS require annual health and safety inspections to assess compliance with health and safety standards. On-site visitation is an important, useful, yet costly way to gather information and determine performance. As the Dashboard and A-133 monitoring tools would already have reviewed many aspects of program function, under the proposed system health and safety could be assessed annually with smaller, more efficient teams than current triennial reviews require or substituted by state or local inspections. The Task Force also recommends that additional and/or unannounced visits be conducted for grantees when areas of concern are identified by the various tools for compliance monitoring.

Based on feedback from the Head Start community, the Task Force proposes the following to strengthen on-site monitoring:

1. Provide high-quality training and preparation to team leaders and members.
2. Select, train and manage team members to assure understanding of content and expertise in gathering the information necessary.
3. Ensure that the monitoring visits be balanced in collecting both positive and negative findings. Excellence is NOT the absence of negative, but world class levels of performance.

The Task Force believes that the dashboard risk management tool, combined with the expanded performance audits and annual health and safety visits will if meet many if not all of the requirements for reviewing programs for compliance with the Head Start...
Standards. The need for triennial monitoring visits will be greatly reduced if not eliminated.

Adoption of these three tools would enable OHS to continually monitor program compliance and target technical support immediately to grantees showing signs of risk. This will allow OHS to use resources as efficiently and effectively as possible.

**Joint Commission for Performance Certification**

In addition to compliance, the Head Start field identified a strong need to recognize and encourage high quality service. The Task Force proposes that the National Head Start Association (NHSA), the American Indian Head Start Association (AIHSA), the Migrant/Seasonal Head Start Association (MSHSA), the Office of Head Start and others partner with the Joint Commission and develop a process to certify high quality programming.

The Performance Certification process would replace the current on-site federal review process; greatly reduce duplication of local, state and federal inspections and could be adopted without arduous legislative encumbrances and as a “low to no cost” alternative. Participation in the Joint Commission for Performance Certification will be voluntary.

The Joint Commission would utilize validated and vetted professionals trained to follow research acceptable procedures and practices and would work closely with early learning accrediting and licensing bodies toward the goal of acknowledging the strengths and certifications of all of the early learning continuum’s programs. Utilizing the Head Start Performance Standards as the foundation of the process, degrees of quality would be established in various aspects of program performance and described with ratings such as bronze, silver, gold and platinum.

Full compliance by a Head Start program as defined under the compliance system would become a basic “silver” level certification. A carefully designed progression would allow and encourage a Head Start grantee or other provider of child care services to move past compliance and progress to “gold” or “platinum” ratings; those falling to “bronze” quality would face competition for continued funding. This progression encourages excellence above and beyond the minimums set by the Performance Standards and the system easily incorporates other early childhood care and education providers who could apply for certification in some or all areas of service delivery.

**Setting Standards and Integrating Systems**

In collaboration with OHS and Early Childhood stakeholders, the Joint Commission would create a model identifying degrees of quality based on the performance standards and related guidance. The performance certification design would provide a clear and logical protocol for certification levels, including a compliance “threshold” and progressive levels above and below. This approach would provide applicants with information and benchmarks for reaching and exceeding minimum compliance levels. It is assumed that the certification tool would use a standard progressive matrix. This approach would provide a standardized rating format that could mimic the ECERs or similar rating instruments. (See Addendum B.)
The Head Start Program Performance Standards define what is required of a Head Start program. The Task Force recommends that the Joint Commission and partners carefully analyze the standards to gauge which are addressed under the Program Standards and Performance Auditing system and to help define levels of certification and rubrics for quality in each area.

Once established, this standardized approach could incorporate other early learning initiatives and oversight systems. The certifying organization would create a crosswalk to support the ready articulation of assessment, validating and licensure processes into the proposed accreditation ranking process. The crosswalk that would indicate, for example, that full compliance on health and safety monitoring earned a Head Start program a “Silver” ranking in that area, or a QRIS rating of 4 in a particular state raised the program in question to the Gold level in particular areas.

The Joint Commission would assume the responsibility of communicating and negotiating with the owners, licensees and others responsible for the development and integrity of instruments and processes for certifying levels of program quality. Since the advancement of an integrated system is a core value of the proposed certification process, communicating with state associations, institutions and organizations is key.

Certification Implementation and Excellence

A grantee who chooses to participate in the certification process would submit ratings, inspection reports and licenses. Based on the crosswalk articulation, the grantee would receive aggregate scores for areas of performance. Standard articulations might include: CLASS scores, Environmental Rating Scale scores, Program Administration Scale scores, NAEYC Accreditation, NAFCC Accreditation and others. Assessments would be conducted by an independent party in the case of CLASS, ECERS, etc. Monitoring teams from the certifying organization would conduct on-site review of areas of the standards not already addressed by a previous license or assessment. The Joint Commission and stakeholders will determine during the creation process the distinct processes and timeline for certification.

A fundamental function of the proposed certification process is promotion of continuous improvement toward excellence in the work done by Head Start and other organizations serving young children and their families. The Performance Certification process would acknowledge a program's strengths with certification.

Grantees would then have an opportunity to review their scores and establish a T/TA plan targeting areas of weakness or of desired excellence and using the rubric of the proximal performance level in those areas as a goal. Once the goals are achieved, grantees could request follow-up visiting to support higher performance certification.

This trajectory toward ever-improving quality holds programs accountable not only to the Office of Head Start but to the children and families who rely on Head Start programs for a wide range of high-quality services.

Adopting a Joint Commission Performance Certification process affords Head Start and the early learning community opportunities to systematically coordinate, maximize resources and inspire improvements in quality. It will be an excellent vehicle for continuing work to define high quality programing and assist all programs on-going efforts to improve their services.
Implementation

The Head Start and Early Head Start monitoring systems have been redesigned numerous times over the past fifty years, always with the intent of improving quality but often in ways that are unintentionally complex and sometime punitive to programs. The intent of this proposal is the same, to improve quality, and also to reduce duplication that has been cumbersome in the past and to make monitoring straightforward and non-invasive for high performing programs.

Head Start Programs

Currently, Head Start and Early Head Start programs are inspected or evaluated multiple times each year by various state and local agencies and every three years through an intensive review by OHS. Under the proposed system, on-site federal monitoring would consist of brief annual reviews focused on health and safety; state and local evaluations would be incorporated in program certification; and data collection through the dashboard, once fully realized, would help programs with short and long term planning. Performance Certification would also recognize programs for excellence and offer clear rubrics for improvement.

Under the proposed system, each program would:

- Provide regular dashboard data based on Critical Success Indicators
- Submit an A-133 audit report as enhanced and directed by OHS to include targeted compliance data
- Undergo an OHS-directed annual health & safety review
- Verify compliance with local regulatory licenses & permits
- Engage in proposed certification process to determine quality level

These components would either continue existing practices or replace less effective current practices. By asking programs to work smarter, not harder, this proposal enables them to better serve children by encouraging best practices that already take place in high quality programs every day.

Child Care Programs

The work of the Monitoring Task Force was undertaken with the understanding that Head Start monitoring has long been a closed system, and that the ability to integrate with other systems would be desirable as part of reform.

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Figure 3. Performance Certification Cycle –
This cycle is intended to be implemented, at least initially, over a period of three years, with on-site visits and certification occurring during the third year.
To that end, the Joint Commission for Performance Certification was designed to have the potential to certify child care programs as well. Based on the areas of service that a child care program worked to meet (for example, a given agency might provide for children's nutritional, education and health/safety needs but not family services) that program could apply to the Joint Commission for certification in those areas. As with Head Start, the program could submit existing monitoring reports from a range of local, state and federal sources and choose to be monitored on site to demonstrate higher levels of excellence as desired.

**American Indian/Alaskan Native Head Start Programs**

The Task Force did its best to make recommendations that can be implemented for all kinds of Head Start programs. The Office of Head Start needs to carefully consider these factors when discussing how to best implement the proposal with American Indian/Alaskan Native Head Start Programs.

_The following section was submitted by the Board of the Native American Head Start Directors’ Association:_

**Tribal Sovereignty**

The 154 Head Start grantees in Region XI are typically smaller programs with a large percentage serving less than 150 children and 10 or more which service 20 children and their families. AIAN Head Start programs are administered by Federally Recognized Tribal Government all having a “Trust Relationship” with the Federal government and are recognized as Sovereign Nations within the 26 states which they are located. Indian Law must be taken into consideration when the Office of Head Start or any agency undertakes a redesign of the existing monitoring system which is required by the Head Start Act, as amended. Indian Law is based within the U.S. Constitution! Unannounced federal onsite reviews are not conducted due to the “government-to-government” relationship between the federal government and Sovereign Nations.

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.” State jurisdiction in the early learning and child care field is non-existent for AIAN grantees. The majority of AIAN grantees are not state licensed.

**Federal Monitoring**

The National Indian Head Start Directors Association has an extensive history in advocating for an improved federal monitoring system and its efforts will continue until there is a fair and balanced approach for monitoring AIAN grantees implemented by the Office of Head Start. Crucial in any approach for monitoring AIAN grantees is a system that is culturally relevant, responsive and reliant. For AIAN programs, the Head Start Program Performance Standards should be used as the basis for assessing the quality of services provided by the AIAN grantees with no reliance upon state developed quality improvement systems. Many states have had little involvement of Tribal grantees operating within their state in developing and evolving their quality improvement systems. Furthermore, many of the 26 developing systems, as reported by the Child Care Bureau and NAEC, need to take stronger action in incorporating culturally responsive and relevant practices as a quality indicator. NIHSDA is concerned with the variance of quality indicators across the affected 26 states. Unlike the non-Indian regional programs, AIAN grantees undergo a comprehensive health and safety assessment conducted by Indian Health Services or tribally administered environmental health services and NIHSDA does not see limiting the federal onsite review to only health and safety issues.

NIHSDA also considers one tri-annual federal review for grantee compliance with the Head Start Program Performance Standards is appropriate within a five (5) year funding cycle.
Data Dashboard
NIHSDA supports the recommendation for the Office of Head Start in capturing of the multiple data points that are submitted by Head Start grantees (Dashboard) after a thorough study in selecting the key indicators in which grantees will be assessed. The data collection system development must include cost estimates for implementing the dashboard.

NIHSDA does not support the use of the federal A-133 audit as a major key indicator because tribes conduct annual single agency audits and most often do not adequately provide a thorough fiscal and program audit of the AIAN Head Start/Early Head Start programs, but the audits meet the federal requirements. NIHSDA could support the A-133 audit findings as one of the many data elements of the Dashboard. The self-assessment should be part of the data elements to specifically measuring grantees’ success in meeting the Head Start Program Performance Standards.

Furthermore, AIAN grantees are not typically licensed by a state agency and undergo a health and safety inspection (more comprehensive that state inspection) through the Indian Health Service or tribally operated environmental services. The annual grantee self-assessment should be included in the Dashboard and would serve as a basis for the federal onsite reviews and could be used by OHS to target key indicators for conducting federal reviews. Federal reviews would serve to verify and document grantees’ compliance with the Head Start Program Performance Standards.

NIHSDA has grave concerns about the use of CLASS as a major key indicator on the Dashboard and the potential penalty of CLASS findings resulting in possible re-competition. The CLASS measures are not culturally and linguistically appropriate for American Indian and Alaskan Native children. Furthermore, the CLASS reviewers most often are not familiar with AIAN cultures and often apply inappropriate observations during AIAN grantee reviews.

If the Dashboard is to be used as a monitoring tool for both the Office of Head Start and grantees the Dashboard must be open to both end users for decision making unlike the Enterprise System: not all information is available for grantee use. Within the concept of this system communication is crucial for effective application both at the grantee level and federal level. Regional office staff and the grantees will require training on the use and function of the Dashboard.

Monthly Reporting
Many of the AIAN grantees will not be able to adequately meet a requirement for “monthly reporting” of these data elements determined to be part of the Dashboard due to the costs associated with data management, e.g., data collection and entry: thereby, potentially placing the grantees in possible jeopardy for non-compliance with reporting requirements let alone other issues of non-compliance and triggers for recompletion. NIHSDA suggests that “quarterly reporting” within this data collection system is more appropriate and would include the Program Information Reporting system (PIR). Including quarterly PIR reports would require an administrative change in requirements by the Office of Head Start.

Accreditation System
A three tiered accreditation systems is overly cumbersome and burdensome for AIAN grantees. NIHSDA does not support a layer approach to accreditation. NIHSDA could support a system for accrediting AIAN grantees based upon the Federal on-site review process and a requirement of a thorough “self-study” by the grantees. The self-study would be parallel to the required self-assessment and would be structured on quality service management outcomes.
This system would be a parallel system developed in concert with NIHSDA, grantee representatives, and early childhood program evaluators.

This system would eliminate the challenge in including AIAN Child Care programs who do not have a federal review and follow standards which are less comprehensive than the Head Start Program Performance Standards. The accreditation process could assess the inter-tribal collaboration of child care services and Head Start services. Most importantly, it would side-step the involvement of state quality improvement efforts inclusive of state licensing unless a AIAN grantee so selected to participate in a state system for quality improvement. AIAN grantees are not licensed by state agencies and have not been included or involved in efforts undertaken by state efforts for quality improvement systems.

A major factor that must be taken into consideration is the cost to the grantee for being accredited. If an accreditation process is instituted within the Law (Head Start Act), consideration must be given to reduced cost or no cost for grantees who serve less than 100 children and a base cost not being more than three thousand dollars and have a built in scale for grantees serving above 100 children (cost per child). Cost is a strong consideration for AIAN programs due to the region's history of underfunding AIAN programs over a period of time. AIAN grantees still are not at parity with regionally funded non-Indian Head Start programs. Additionally, a good number of AIAN programs have moved away from the NAEYC Accreditation process due to the cost of undergoing such a review. For grantees who serve less than 100 children and a base cost not being more than three thousand dollars and have a built in scale for grantees serving above 100 children (cost per child). Cost is a strong consideration for AIAN programs due to the region's history of underfunding AIAN programs over a period of time. AIAN grantees still are not at parity with regionally funded non-Indian Head Start programs. Additionally, a good number of AIAN programs have moved away from the NAEYC Accreditation process due to the cost of undergoing such a review.

Migrant and Seasonal Head Start Programs

The Task Force did its best to make recommendations that can be implemented for all kinds of Head Start programs. The Office of Head Start needs to carefully consider these factors when discussing how to best implement the proposal with programs who serve migrant and seasonal children and their families.

The following section was submitted by the Board of the National Migrant Seasonal Head Start Association:

Unique Characteristics of Migrant and Seasonal Head Start Programs (MHS)

The 26 Head Start grantees in Region XII share many unique characteristics that must be considered when making changes and recommendations to the current Monitoring Systems. More than 60% (sixty) of the children served in MHS Programs are between the ages of 6 weeks and 3 years old- infants and toddlers. MHS Programs do not offer a typical year-round program model, but rather provide programming according to the needs of families, often dictated by growing and harvesting demands and seasons. MHS Programs can be in operation from as few as 6 weeks to a full typical school calendar year. MHS Programs also offer services outside the typical regional Head Start hours of operation. Programs may start as early as 4 am and end as late as 7 pm. Programs may offer families services six (6) days a week. Many MHS Programs are in rural communities which may complicate service delivery. Migrant families are mobile and transitional in nature. This common characteristic offers an additional layer of circumstances which may impact program services. Additionally, any new system of monitoring must take into consideration the unique relationship that exists between MHS Grantees and contracted Family Child Care Providers. Although this model may have the appearance of a Delegate/Grantee Relationship, it in fact is not the case.
Federal Monitoring
The National Migrant Seasonal Head Start Association has an extensive history in advocating for an improved federal monitoring system and its efforts will continue until there is a fair and balanced approach for monitoring Region XII grantees implemented by the Office of Head Start. Crucial in any approach for monitoring MHS grantees is a system that is culturally relevant, responsive and reliant. The NMSHSA fully supports any Federal Monitoring System that will ensure and maintain programs of quality and accountability.

NMSHSA also considers one tri-annual federal review for grantee compliance with the Head Start Program Performance Standards is appropriate within a five (5) year funding cycle.

Data Dashboard
NMSHSA supports the recommendations of the Task Force as related to data dashboards concept. NMSHSA supports any effort which will streamline program data for easy interpretation and ensure quality performance and accountability. Any data collection system development must include cost estimates for implementing. NMSHSA supports the A-133 audit findings as one of the many data elements of the Dashboard. The self-assessment should be part of the data elements to specifically measure grantees’ success in meeting the Head Start Program Performance Standards. The annual grantee self-assessment should be included in the Dashboard and would serve as a basis for the federal onsite reviews and could be used by OHS to target key indicators for conducting federal reviews. Federal reviews would serve to verify and document grantees’ compliance with the Head Start Program Performance Standards. As indicated by NIHSDA, NMSHSA shares concerns about the use of CLASS as a major key indicator on the Dashboard and the potential penalty of CLASS findings resulting in possible re-competition. MHS Programs have found CLASS measures are not culturally and linguistically appropriate for Migrant Seasonal Head Start children. Furthermore, the CLASS reviewers most often are not familiar with the unique characteristics of MHS Programs and may often conclude inaccurate and inappropriate observations. And lastly, CLASS is not designed for infant toddler teacher interactions which would mean judging on a disproportionate percentage of children we serve.

Monthly Reporting
As recommended by National Indian Head Start Directors Association (NIHSDA), NMHSA shares a similar concern that MHS grantees may not be able to adequately meet a requirement for “monthly reporting” of data elements determined to be part of the Dashboard due to the costs associated with data management, e.g., data collection and entry: thereby, potentially placing the grantees in possible jeopardy for non-compliance with reporting requirements. Such jeopardy may determine a MHS Grantee to be in non-compliance and therefore be a trigger for re-competition. NMSHSA suggests a data collection system which is more appropriate and would include the Program Information Reporting system (PIR).

Accreditation System
NMSHSA Supports the Task Force’s recommendation of a three tiered accreditation systems. NMSHSA supports a layered approach to accreditation. NMSHSA supports a Joint Commission approach as well. NMSHSA agrees and supports any efforts which will maintain quality programs or serve to raise the quality and accountability of any program providing Head Start services. Any implementation of an accreditation system must take into account any cost associated with such a system. All considerations must be taken for any MHS program due to the history of underfunding for MHS programs. MHS grantees are still not equally funded compared to regional Head Start counterparts.
State QRIS Systems
Currently, there is significant variation in Head Start’s role in state QRIS systems, both in terms of input and evaluation. Head Start standards and measurement of child outcomes and family engagement have informed the development of QRIS systems in some states. Head Start/Early Head Start programs also participate in QRIS systems, especially in states where QRIS is tied to licensing. However, in most states QRIS participation is voluntary. The Race to the Top-Early Learning Challenge (RTT-ELC) initiative requires that states’ work toward the goal of all publicly-funded early learning programs participating, which is moving states with RTT-ELC awards toward a more inclusive approach.

A primary goal of the Joint Commission certification of high quality services process is to align and incorporate state and nationally recognized validating systems, which will build on Head Start’s history of collaboration and improve integration. The Task Force intends for this proposal to complement the work being done developing QRIS systems in states, not supplant it. The Joint Commission for Performance Certification would recognize how each state with a QRIS system validates programs' quality. For states just beginning to develop their QRIS systems, states struggling with how to best include Head Start programs in their QRIS system or states working to include Head Start in their development of longitudinal data and outcomes tracking, this new system will make the process easier.

Next Steps
This report has described a proposed avenue for monitoring reform, but any change that takes place must begin with the current system. The following section describes (1) how elements of the current system will evolve under this proposal, (2) immediate steps for transitioning to the proposed system, and (3) how efficiency and effectiveness will be improved through that process.

Transitioning the Current System
Under the proposed system, triennial reviews, T/TA and DRS would all evolve in their implementation, but their goals of ensuring compliance, supporting programs, and competing low performers would still be met and with increased consistency and speed.

Currently, the OHS monitoring system assesses compliance with the Head Start Performance Standards through triennial reviews. Based on those reviews, programs’ needs, and instructions from OHS, the regional training and technical assistance systems (T/TA) provide support to programs. The Designation Renewal System (DRS) forces programs that are out of compliance with the Performance Standards, have low CLASS scores, or fail a range of auditing/licensing procedures to compete with other potential providers for continued grant funding.

Triennial Reviews
The Triennial Review would no longer exist in its current form, but the areas of program function it addresses would be monitored for compliance:

- Funding, ERSEA, enrollment, and other areas designated by OHS would be captured by the A-133 audit and/or dashboard system.
- Health and Safety standards would be evaluated annually.
- Remaining Performance Standards would be evaluated by the Joint Commission based on state and local monitoring or JC on-site monitoring.
- CLASS scores would be taken by outside assessors and submitted by programs to the Joint Commission as part of certification.
Training and Technical Assistance
Training and Technical Assistance during implementation would focus on helping programs implement the dashboard and integrate it with their existing internal monitoring systems. Ultimately, however, under the new proposal T/TA would be targeted in two ways. First, OHS would use trends in dashboard data to quickly identify programs in need of compliance support. Second, based on certification ratings from the Joint Commission, programs would create their own improvement plans and request specific T/TA in order to meet them. These two methods are intended to make the most effective use of T/TA time and funding and to both avoid compliance issues and support program excellence.

Designation Renewal System
The Final Rule on Designation Renewal, released in the fall of 2011, calls for programs to compete for continued funding if they fail to meet a set of seven key conditions. All of these would continue to be monitored under the current system. Through the dashboard, audit, and site-visit, OHS would monitor compliance in many areas and would gather reports on licensing and status as a going concern. The Joint Commission process would evaluate scores on the CLASS and other assessments, as well as compliance with performance standards, and would designate programs found out of compliance or below a certain threshold on CLASS as in the “bronze” category. The Office of Head Start could then consider either lack of compliance with elements under their oversight or a rating of “bronze” by the Joint Commission as grounds for recompetition.

Efficiency and Effectiveness
The current monitoring system consumes funding and resources across the Head Start infrastructure, at the grantee, OHS, vendor and contractor levels, each year. Additional dollars are spent to monitor quality in federally funded child care settings.

While analyses of cost savings remain to be undertaken as these proposals are further developed, greater efficiency and higher quality of monitoring and accountability can be projected in several areas. First, data gathering through the dashboard and A-133 reduce the oversight burden on federal Head Start monitoring teams and will allow the Office of Head Start to send smaller, better trained teams into the field to conduct site visits. Second, once training is provided to all Head Start programs about implementation of the new systems, OHS will be able to use data from the dashboard to provide individualized and immediate training and technical assistance to programs with indications of risk. Third, as program certification motivates improved service delivery across Head Start and Early Head Start, T/TA costs and the expense of the Designation Renewal System will be reduced.

While the Joint Commission model would require funding, this could be redirected from savings elsewhere. The performance certification fee would be paid to the certifying organization by the grantee as an allowable cost.

In addition, a primary function of the certification process is to recognize and encourage excellence across Head Start and Early Head Start programs. This would support grantees in gaining access to private and public quality related early learning resources.

First Steps
The elements of the Program Standards and Performance Auditing system already exist in some form, and can be immediately redesigned to work in the more streamlined ways described above. Creation of the Joint Commission requires deliberate work on the part of the National Associations, the Office of Head Start, leaders from the child care field and the Joint Commission or an analogous body to develop definitions and degrees of certification. Once
developed, the Joint Commission will offer national certification for all Head Start, Early Head Start and early childhood care and education programs.

To begin this work, the Task Force recommends the Office of Head Start immediately implement this proposal by doing the following:

1. Develop a dashboard system and identify Critical Success Indicators, as well as a process for review of CSIs and development of corresponding targeted T/TA.
2. Work with OMB on expanded guidance for A-133 audits.
3. Identify targeted performance standards and monitoring procedures and develop a process for on-site Health/Safety reviews.
4. Begin discussions with the Joint Commission or an analogous body about translating the Performance Standards into a quality rating system and building a crosswalk with other monitoring and rating systems.

**Recommendations**

The earliest years of a child’s life are the foundation for his or her life-long health, development and learning. Local, state and federal monitoring systems are intended to ensure that early childhood care and education settings support those early years. Head Start and Early Head Start programs embrace that same goal, and work hard to meet rigorous standards and go beyond them. To that end, monitoring systems should both support compliance and encourage excellence.

Aligned with its objectives, the National Head Start Association’s Head Start Monitoring Task Force recommends the following:

1. Creation of a Performance Standards and Program Auditing system overseen by the Office of Head Start to provide consistent, responsive oversight of compliance in areas critical to basic program function and children’s health and safety.
2. Creation of a Joint Commission for Performance Certification to recognize program excellence and facilitate the integration of local, state and federal monitoring into a single rating system.
3. On-going discussion across the Head Start field and throughout the early childhood care and education community about what impact is, how to measure it, and how to ensure that monitoring drives the pursuit of excellence in serving vulnerable children and families.
Addendum A: Task Force Members

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Addendum B: Sample Matrix of Performance Standards Converted for Performance Certification

<table>
<thead>
<tr>
<th></th>
<th>Threshold</th>
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<tbody>
<tr>
<td></td>
<td>Bronze</td>
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<tr>
<td>Child health and developmental services.</td>
<td></td>
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<tr>
<td>Education and early childhood development</td>
<td></td>
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<tr>
<td>Child health and safety</td>
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<td>Child nutrition</td>
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<tr>
<td>Child mental health</td>
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<td>Family partnerships</td>
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<tr>
<td>Community partnerships</td>
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<tr>
<td>Program governance</td>
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<td>Management systems and procedures</td>
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<td>Human resources management</td>
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<tr>
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<tr>
<td>Deficiencies and quality improvement plans</td>
<td></td>
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<tr>
<td>Noncompliance</td>
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</tbody>
</table>

1301.11 Insurance and bonding.
1301.12 Annual audit of Head Start
1301.13 Accounting system certification.
1301.20 Matching requirements.
1301.30 General requirements.
1301.31 Personnel policies.
1301.32 Limitations on costs of development and administration of a Head Start program.
1301.33 Delegation of program operations.

§ 1302.3 Consultation with public officials and consumers.
§ 1302.4 Transfer of unexpended balances.
§ 1302.32 Alternative agency—prohibition.

§ 1303.20 Appeals to grantees by current or prospective delegate agencies of rejection of an application, failure
| § 1303.20 Appeals to grantees by current or prospective delegate agencies of rejection of an application, failure to act on an application or termination of a grant or contract. |
| § 1303.21 Procedures for appeal by current or prospective delegate agencies to the responsible HHS official from denials by grantees of an application or failure to act on an application[KG1]. |
| § 1305.3 Determining community strengths and needs.  |
| § 1305.4 Age of children and family income eligibility.  |
| § 1305.5 Recruitment of children.  |
| § 1305.6 Selection process.  |
| § 1305.7 Enrollment and re-enrollment.  |
| § 1305.8 Attendance.  |
| § 1305.9 Policy on fees.  |
| § 1305.10 Compliance.  |
| §1306.20 Program staffing. |
| §1306.21 Staff qualification requirements.  |
| § 1306.22 Volunteers.  |
| § 1306.23 Training.  |
| § 1306.30 Provisions of comprehensive child development services.  |
| § 1306.31 Choosing a Head Start program option.  |
| § 1306.32 Center-based program option.  |
| § 1306.33 Home-based program option.  |
| § 1306.34 Combination program option.  |
| § 1306.35 Family child care program option.  |
| § 1306.36 Additional Head Start program option variations.  |
| § 1306.37 Compliance waiver.  |
| §1308.4 Purpose and scope of disabilities service plan.  |
| §1308.5 Recruitment and enrollment of children with disabilities.  |
| §1308.6 Assessment of children.  |
| §1308.7 Eligibility criteria: Health impairment.  |
| §1308.8 Eligibility criteria: Emotional/behavioral disorders.  |
| §1308.9 Eligibility criteria: Speech or language impairments.  |
| §1308.10 Eligibility criteria: Mental retardation.  |
| §1308.11 Eligibility criteria: Hearing impairment including deafness.  |
| §1308.12 Eligibility criteria: Orthopedic impairment.  |
| §1308.13 Eligibility criteria: Visual impairment including blindness. |
§1308.14 Eligibility criteria: Learning disabilities.
§1308.15 Eligibility criteria: Autism.
§1308.16 Eligibility criteria: Traumatic brain injury.
§1308.17 Eligibility criteria: Other impairments.
§1308.18 Disabilities/health services coordination.
§1308.19 Developing individualized education programs (IEPs).
§1308.20 Nutrition services.
§1308.21 Parent participation and transition of children into Head Start and from Head Start to public school.

§1309.2 Approval of previously purchased facilities.
§1309.4 Eligibility—Construction.
§1309.5 Eligibility—Major Renovations.
§1309.10 Applications for the purchase, construction and major renovation or facilities.
§1309.11 Cost comparison for purchase, construction and major renovation or facilities.
§1309.12 Timely decisions.
§1309.20 Title.
§1309.21 Recording of Federal interest and other protection of Federal interest.
§1309.22 Rights and responsibilities in the event of grantee’s default on mortgage, or withdrawal or termination.
§1309.23 Insurance, bonding and maintenance.
§1309.30 General.
§1309.31 Site description.
§1309.32 Statement of procurement procedure for modular units.
§1309.33 Inspection.
§1309.34 Costs of installation of modular unit.
§1309.40 Copies of documents.
§1309.41 Record retention.
§1309.42 Audit of mortgage.
§1309.43 Use of grant funds to pay fees.
§1309.44 Independent analysis.
§1309.51 Submission of drawings and specifications.
§1309.52 Procurement procedures.
§1309.53 Inspection of work.
§1309.54 Davis-Bacon Act.

§1310.10 General.
§1310.11 Child Restraint Systems.
§1310.12 Required use of school buses or allowable alternate vehicles.
§1310.13 Maintenance of vehicles.
§1310.14 Inspection of new vehicles at the time of
| §1310.15 Operation of vehicles. |
| §1310.16 Driver qualifications. |
| §1310.17 Drivers and bus monitor training. |
| §1310.20 Trip routing. |
| §1310.21 Safety education. |
| §1310.22 Children with disabilities. |
| §1310.23 Coordinated transportation. |
Addendum C: References


