



**FIRST FOCUS**

MAKING CHILDREN & FAMILIES THE PRIORITY

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September 17, 2015

Office of Head Start  
Attention: Director of Policy and Planning  
1250 Maryland Avenue, SW  
Washington, DC 20024

**RE: Docket ID 2015-14379, Notice of Proposed Rulemaking (NPRM) to update Head Start Performance Standards, 80 FR 35429 (June 19, 2015)**

Dear Director of Policy and Planning:

As an organization committed to ensuring that children and families have access to high quality early learning opportunities, First Focus appreciates the opportunity to submit comments to the Notice of Proposed Rulemaking for the Head Start Program Performance Standards (NPRM).

For over 50 years, Head Start has ameliorated the devastating impacts of child poverty with comprehensive and interdisciplinary educational, nutritional, health, social, and parental engagement services for low-income children during their earliest years when their brain development is most rapid. First Focus commends the Office of Head Start for its thoughtful integration of decades worth of research, experience and insight into the updated Performance Standards to ensure that Head Start provides effective services for children and families for decades to come. First Focus joined other organizations in responding to key issues with respect to the Performance Standards, however we submit this letter to specifically address issues related transitioning Head Start to full-day/full-year services and the home-based option. In summary, given the current lack of adequate funding to transition to full-day/full school-year services, we recommend that the Office of Head Start provide programs with flexibility and guidance on how to smoothly transition operations to avoid the loss of services. We also recommend that the Office of Head Start retain the home-based preschool option and, to the greatest extent possible, align the home based options with the evidentiary and programmatic standards of the Maternal, Infant and Early Childhood Home Visiting Program (MIECHV) to create a seamless system of effective home visiting for children and families. Our recommendations are outlined in greater detail below:

## **RECOMMENDATIONS**

### **Provide Programs with Guidance and Flexibility to Transition to Full-Day/Full-Year Programs to Avoid the Loss of Services to Children and Families**

We strongly support expanding Head Start to full-day/full school-year services ((§1302.21(c)(3) and §1302.22(c)) to produce greater educational outcomes for children. We also support increased federal funding for Head Start to extend its services to full-day and full-year. We are aware, however, that current funding cannot support Head Start's transition to full-day/full school-year services without children and families losing services. As indicated in the NPRM, the costs of implementing these improvements would result in 126,448 fewer children being served through Head Start. We caution against implementing these

improvements without the necessary resources. To do so would cause children in the poorest communities to lose services. We recommend that the Office of Head Start allow grantees flexibility, and provide grantees with guidance in securing additional funding and sufficient time to transition to full-day/full school-year services to avoid the loss of slots for children and families in need.

### **Retain Home-Based Preschool Option without Waiver Requirement §1302.22/§1302.35**

We recommend retaining the home-based preschool option. Home visiting offers tremendous benefits to 4-5 year old preschoolers who, along with their parents, need intensive home visiting to help connect them with available community resources, such as mental health support, screenings, and referrals to services. For example, some preschoolers with disabilities or mental health challenges may find the home-based option better suited to their needs than full-day/full-year center-based services. In addition, children in rural communities and children in families whose cultural values and/or language barriers make them reluctant to allow young children to attend all-day preschool, prefer a trusted home visitor, who serves as an effective resource to provide the family with educational and other supports needed to foster early learning and parental engagement. Eliminating the home-based preschool option will create barriers to the ability of these children and families to access services.

### **Align Home-Based Preschool and Home-Based Option in Early Head Start with Evidentiary and Programmatic Standards of MIECHV to create a seamless system of home visiting across early childhood programs**

Evidence-based, voluntary home visiting has a long track record of improving the early health, school readiness and economic stability of young children and their families. For these reasons, home visiting has been an important component of Head Start to provide effective in-home counseling, guidance and services to the most vulnerable children and families. In the past 10 years, home visiting has more broadly emerged as an effective strategy to improve the long-term holistic health, development and education of children and families living in poverty. Backed by evidence of the effectiveness of home visiting, the Maternal, Infant and Early Childhood Home Visiting Program (MIECHV), was enacted in 2010. Funded at \$400 million annually, MIECHV provides funding to states, territories, tribes and tribal organizations to implement and expand primarily evidence-based home visiting models that meet or exceed rigorous evidentiary standards. The Department of Health and Human Services has designated 17 evidence-based home visiting programs that meet criteria of effectiveness in childhood and family outcomes, including school readiness. Early Head Start (Home-Based Option), Parents as Teachers, Nurse-Family Partnership, and Home Instruction for Parents of Preschool Youngsters, are among the models that have been designated as evidence-based and proven to improve children's school readiness. States, territories and tribes implementing evidence-based home visiting under MIECHV select the evidence-based home visiting models best suited to enable them to meet important benchmarks in child health, education and economic stability. Since MIECHV's enactment, states, territories and tribes have implemented and embedded home visiting within early childhood systems of care, including childcare, educational, and health settings, to create a strong continuum of services for children and their families.

First Focus recommends that the Office of Head Start revise the standards applicable to the home-based options in Head Start so that they are consistent with the evidentiary standards governing home visiting models participating in MIECHV. In practice, this would mean that programs electing to deliver the home-based options would have the flexibility to implement any of the home visiting models designated as evidence-based by the Department of Health and Human Services under MIECHV so long as the model meets the goals of Head Start. Because evidence-based models meet rigorous evidentiary and operational standards, the Office of Head Start would be assured that programs are providing high quality home visiting services that have been proven effective in research as well as real world practice. Home visiting models selected by Head Start/Early Head Start programs would be expected to comply with their model rules

regarding the frequency and content of home visits, and comply with state reporting requirements similar to the MIECHV program.

Aligning the evidentiary and programmatic standards would result in one standard defining the quality of the home visiting applicable to Head Start and MIECHV, which serve the same populations of children and families, and have similar goals and objectives. Consistency in standards would also reduce confusion in having two federal programs with differing requirements and standards, yet with similar goals and objectives. Importantly, having consistent standards would facilitate collaboration, information sharing, evaluations, and integration between and across MIECHV-supported state and local home visiting initiatives with Head Start/Early Head Start home-based programs. This, in turn, would facilitate efforts to build integrated early childhood learning systems that have the potential to improve outcomes across a broad spectrum for both children and their families.

First Focus appreciates your leadership and commitment to the Head Start program and the children and families it empowers to thrive in school and in life. We look forward to working with you to further strengthen the proposed standards.

Sincerely,



Bruce Lesley  
President, First Focus