



## NATIONAL HEAD START ASSOCIATION

National Head Start Association (NHSA) Comments in Response to Docket No: HHS-ACF-2019-0005 and RIN: 0970-ZA15

Department of Health and Human Services  
Administration for Children and Families  
330 C Street SW  
Washington, D.C. 20201

December 2, 2019

To Whom It May Concern:

On behalf of the National Head Start Association (NHSA) and the Head Start community, we are pleased to provide comments in response to the HHS Administration for Children and Families' "Improving Access to Affordable, High-Quality Child Care: Request for Information" (RFI).

Our comments start with an exploration about NHSA, why Head Start's perspective is vital to this conversation, and three core priorities that must be considered when making any changes to our nation's early learning system. The comments continue with detailed recommendations based on the questions posed by the RFI. Thank you for the opportunity to engage in this critical conversation that will have deep impact on the future of our great nation.

### **ABOUT NHSA**

NHSA is the voice for more than one million children and their families in Head Start and Early Head Start (collectively referred to as "Head Start") programs across the United States. Recognizing the devastating impact that poverty can have on the future success of young children, Head Start represents a longstanding national commitment to provide quality early learning opportunities for at-risk children and comprehensive services to support families on a path to achieve long-term stability and success. NHSA believes that every child, regardless of circumstances at birth, has the ability to succeed in school and life if given the opportunity.

### **HEAD START'S PERSPECTIVE**

Over the course of nearly 55 years in existence, Head Start has had a positive impact on the lives of over 36 million children and their families. We are proud of Head Start's comprehensive multi-generational approach which includes a focus on school readiness, child development, health and family strengthening. While we recognize that many child care programs cannot deliver a full range of comprehensive child and family services, we firmly believe that, to the greatest extent possible, child care should be funded and supported in ways that allow providers to target services, supports and partnerships tailored to the unique needs of each child and family.

Head Start programs are locally-rooted and deeply intertwined with local child care, in ways both informal and formal. Informally, both sectors work with children from birth to five, have overlapping workforces, and support parents or caregivers and families so they can further their education, stay employed, or go back to work. Formally, both participate in the federal Child Care Development Fund (CCDF) program and state Quality Rating and Improvement Systems (QRIS), receive similar accreditation, and engage in locally driven partnerships with each other, such as the Early Head Start-Child Care Partnership federal grant program to meet the needs of children and families.

### **CORE PRIORITIES**

The following three core priorities must be taken into consideration while making changes to our nation's child care and early education system.

**Additional funding is key to helping child care maximize every child's potential.** While scarcity can on occasion breed innovation, any system in constant survival mode cannot deliver consistently meaningful results. Consistent funding that is sufficient to achieve high quality and continuously improve opens the doors to essential elements of a multigenerational approach in early learning, including:

- Consistent, caring relationships between child care teachers, children and parents;
- Authentic caregiver and family engagement to leverage their interests and strengths;
- Healthy and safe facilities that ease a parent or caregiver's anxiety while simultaneously supporting healthy child development;
- Community needs assessments that drive program decision making and inform programming;
- Child-level assessments and data to inform the provision of specific support and facilitate connections to more targeted interventions, such as special education services; and
- Community partnerships in the areas of basic needs, education, health, job training, housing, transportation and other needs.

**Devolving informed decision-making to the lowest level possible while maintaining a rigorous framework will keep children safe, increase the supply of high quality care, and allow for authentic parent/caregiver choice.** Head Start has 1,600 local grantees, often embedded in trusted community institutions. Within the framework of the Head Start Program Performance Standards (HSPPS), programs structure local partnerships, decide what curricula to use, choose their own professional development and make a myriad of other decisions. This approach works because of the balance between rigorous federal standards -- a floor of high quality -- and local tailoring and innovation. The sooner systems, such as our nation's child care system can be driven to a consistently higher floor of quality, the sooner efficiencies and local innovations can be exploited and programs, teachers, children and families can thrive.

**Support for children *and* their families yields better outcomes for both.** As you consider the causes and effects of deficiencies in our nation's child care program -- and seek solutions to address them -- we encourage a bold focus on multigenerational child care that is well-funded, locally-driven, and balanced by high standards for health, safety, and child well-being. The potential for such a system to improve the lives of children and families is exponentially greater than the current structure. Accessing the talents and

assets of parents, caregivers, and families of young children is an untapped wealth of strength for U.S. child care and local economies.

## **DETAILED COMMENTS**

### **I. Improving Access to Affordable, High Quality Child Care**

#### **A.2. Improving child care regulations**

##### ***Specific Recommendations:***

- 1. Maintain child health and safety as a top priority.*
- 2. In re-evaluating how regulations and practice can best support outcomes, utilize a human-centered design approach.*

When considering licensing, regulation or monitoring of child care, **health and safety must continue to be the top priority**. Child care is a labor-intensive industry, one which is inherently resistant to the automation and technological efficiencies present in many other sectors of the economy. While there may be some efficiencies to be gained in child care, such as by making business operations easier for in-home care providers with outside support, states should not be incentivized or encouraged to weaken core health and safety regulations, including adult-to-child ratios and maximum class sizes, or those that seek to elevate quality, such as minimum adult qualifications.

One approach to regulatory improvement is the **expanded use of human-centered design** in licensing, regulation and monitoring. The human-centered design (HCD) approach is centered around the inclusion of the end-user in the process of identifying problems, analyzing needs, and designing solutions. The Head Start community has had great success building our portfolio of projects around innovation and data in early childhood using the HCD approach. We commend the administration's commitment to exploring the use of HCD in Head Start and other human services programs, such as the Head Start monitoring system redesign, and encourage its utilization in child care as well.

#### **A.3. Cultivating the child care workforce**

##### ***Specific Recommendations:***

- 1. Increase programs, such as loan forgiveness and leadership development, and alignment between child care and workforce systems in order to make careers in early childhood more financially appealing, and in turn, lead to less turnover in the early childhood workforce.*
- 2. Invest additional public funding to stabilize the existing early childhood workforce.*
- 3. Focus on sustaining and growing diversity in the field of child care and early childhood education.*

Market forces lead people to make career choices that make economic sense to them. Whether it's due to choosing to work in public schools for more pay and benefits or leaving the early childhood field entirely, turnover in the child care workforce remains detrimentally high. Given the importance of stable, caring relationships between adults and the children in their care on child outcomes, **we recommend increasing**

**incentives to encourage the workforce to enter and remain in the early childhood field.** This can be accomplished by including additional resources for programs such as loan forgiveness and leadership development and by better aligning state WIOA and Perkins programming with child care and early education systems. Expanded loan forgiveness and alignment across systems for the early childhood workforce could immediately help reduce turnover and expand the number of available professionals in the field.

Child care programs cannot be built or delivered without a stable and well-educated workforce. Continuous relationships are key to delivering child development outcomes, improving program climate and supporting overall program and organizational effectiveness. Increases in state and local minimum wages are leading to well-deserved pay increases for child care workers, but putting enormous pressure on child care programs as they struggle to pay higher wages and face increased labor market competition. **Additional public funding is needed to stabilize today’s early childhood workforce and begin growing the workforce of tomorrow.** Absent more public funding, due to these difficulties, there will likely be more program closures and unacceptably high workforce turnover and attrition. Strengthening the early childhood workforce must be a top priority of the administration before it topples the entire system and puts children in harm’s way.

**Supporting workforce preparation and leadership among educators and caregivers of color is particularly critical to meeting the needs of an increasingly diverse child and family population.**

With teachers and program staff from similar backgrounds as the communities they serve, Head Start programs have been able to more effectively build trust, rapport, and, ultimately, a more effective relationship with parents and caregivers. This, in turn, allows for deeper parent/caregiver engagement in their child’s education leading to increased child outcomes<sup>1</sup>.

#### **A.4.a. Developing Better Child Care Business Models**

##### ***Specific Recommendations:***

1. *Renew the focus on predictable, long-term funding streams that expand parent choice by encouraging additional center-based child care slots funded through contracts rather than parent vouchers.*

**We recommend increasing the quantity of center-based child care slots funded through contracts as a means of expanding parent choice.** Moving almost entirely away from contract-based funding for CCDF-funded classrooms and towards vouchers has resulted in the unintended consequence of significant program instability. We support parent choice, but paradoxically, the lack of center-based slots has, in many communities, left parents with fewer choices, as child care centers have found it too difficult to operate a successful business when dependent on voucher-based funding. A voucher-based system reduces the predictability of funding that child care programs need to budget and make investments in

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<sup>1</sup> Nix, R. L., Bierman, K. L., Motamedi, M., Heinrichs, B. S., & Gill, S. (2018). Parent engagement in a Head Start home visiting program predicts sustained growth in children’s school readiness. *Early childhood research quarterly*, 45, 106-114; Hayakawa, M., Englund, M., Warner-Richter, M., & Reynolds, A. (2013). Early parent involvement and school achievement: A longitudinal path analysis. *NHSA Dialog*, 16(1).

facilities, materials, staff and the like. The 2015 reauthorization of the CCDBG recognized this challenge by specifically authorizing alternatives to voucher funding (such as center based grant funding). In light of significant additional CCDBG funding, the administration has a real opportunity to prioritize these alternatives. Ultimately, expansion and relative consistency of child care funding would help to support better business practices and child outcomes within a voucher-driven child care subsidy context.

#### **A.4.b. Shared Services Alliances and Consortia**

##### ***Specific Recommendations:***

1. *Increase the federal investment in Early Head Start - Child Care Partnerships (EHS-CCPs).*
2. *Incentivize states to align CCDF policies with federal Early Head Start requirements in order to support EHS-CCPs.*

**EHS-CCPs are a strong example of shared services worthy of expansion.** Congress funded Early Head Start expansion and child care partnerships (EHS-CCPs) in 2014 as an innovative approach to cross-program coordination. They are designed to build on the existing strengths of Early Head Start to address some of the challenges facing many small child care providers who operated in the CCDF subsidy system, such as access to professional development training and access to comprehensive services. Preliminary findings cataloged by ChildTrends<sup>2</sup> show:

- Increased staff education and training, improvements in physical settings, and increased opportunities to offer comprehensive services;
- Decreased feelings of isolation and increased feelings of belonging among child care partners;
- Easier processes for enrolling children with subsidies; and
- Greater parental satisfaction with care and increased feelings of empowerment.

This model has demonstrated its effectiveness already and, with additional federal investment and support from state CCDF policies that align to federal Early Head Start requirements, even more children and families can benefit from the innovative approach.

#### **A.4.c Adjusting to Expanded Public Pre-kindergarten Programs**

##### ***Specific Recommendations:***

1. *Ensure maximum flexibility for local Head Start programs to serve children across a variety of ages by allowing for prenatal through age five grants.*
2. *Raise the Head Start income eligibility above the current federal poverty guidelines.*
3. *Support states and local communities that prioritize enrolling income- or categorically-eligible families in Head Start and Early Head Start programs.*
4. *Incentivize states to provide state supplemental funding that expands the reach and quality of Head Start and Early Head Start.*

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<sup>2</sup> Child Trends, “Early Head Start Child Care Partnerships Annotated Bibliography,” (January 18, 2019); accessed online at <https://www.childtrends.org/publications/early-head-start-child-care-partnerships-annotated-bibliography>

Investments in state and local pre-kindergarten programs have substantially grown over the past decade. This expansion has presented some challenges to traditional child care business models, but the opportunity it presents for expanding access to high-quality early education is clear. From a Head Start perspective, however, changes to current federal policies must be considered given recent state and local changes. Specifically, for local Head Start providers to more effectively adjust to a changing local environment, it is important that they have **maximum flexibility to serve across ages birth-to-five, and income eligibility guidelines that more accurately address the need for affordable, high quality care.**

In the context of the Head Start Act, the Head Start community is supportive of changes in the next reauthorization that would allow for prenatal-to-five grants and expand income eligibility beyond 130 percent of the federal poverty level. Allowing programs to fluidly shift their federal funding between different age ranges would enhance their ability to serve families and operate efficiently as community contexts change due to increases in public preschool options. Expanded income eligibility is an urgent priority given that 26 states and the District of Columbia have increased their effective minimum wage since January of 2014. Many families who could benefit from Head Start and Early Head Start are now no longer eligible, but the needs of their children have not been met and they are unable to afford care on their own.

Further, we recommend that states and local communities **prioritize enrollment in Head Start and Early Head Start programs for families who are income or categorically eligible.** Head Start has been authorized and funded specifically to provide dedicated support for our nation’s most vulnerable children and families. Not all families require the Head Start slate of services and supports, but it is a critical and effective model for those with the greatest need. Empowering families and local communities to support their most at-risk populations through Head Start grants and encouraging eligible families to enroll and attend must be a core pillar of any redesigned early childhood system.

**Finally, we recommend the administration incentivize state supplemental funding to expand the reach and quality of Head Start and Early Head Start for states that choose to do so.** A number of states have found building on the proven and well-established Head Start infrastructure to be the most efficient use of their state dollars; 13 states have committed over \$300 million in their most recent state budgets for direct funding of Head Start and Early Head Start. Even modest state funding can provide needed resources to fill critical service gaps for at-risk children, promote child care partnerships and help local nonprofits meet their required federal matching obligations.

## II. Transforming Financing of Child Care and Early Education Programs

### ***Specific Recommendations:***

- 1. Increase federal funding for local community-based programming.*
- 2. Ensure public funding allows for multiple entry points and multiple program options in order to meet the needs of all children and families.*
- 3. Establish a dedicated funding stream for early childhood facilities.*

With respect to financing, our comments recognize the incredible challenges facing the current early childhood financing system. We believe the primary challenge with financing remains a lack of funding necessary to meet the need for high quality child care and early learning opportunities. Research on early childhood development unequivocally shows the importance of high-quality early learning opportunities, but access to high quality care does not reflect this importance. Just one in three income-eligible Head Start children were served by the program in the most recent program year, and just eight percent of income-eligible infants and toddlers accessed Early Head Start. Only a handful of states currently fund universal preschool, and the level of quality varies considerably. There are no state programs that address the urgent need for high-quality infant and toddler care.

Further, challenges in providing and maintaining access to high quality child care and early education vary from community to community. For example, in some rural communities, a lack of reliable transportation services impedes families' ability to utilize center-based services. However, an urban community in the same state may struggle with access to safe facilities or changing community make-up. The solution to addressing these issues must be a locally driven solution or the solution posed at the state or federal level will create further fracturing and unnecessary duplication.

Given the wide variation in state-based services and disparities in the current system, **we recommend that the administration consider utilizing the Head Start model of federal grants for locally-run programs as a means to improve the efficiency of and access to high quality child care and early education.**

While the alignment of funding sources is important, the Head Start community strongly believes that the current system of multiple funding sources is critical in any future system. A Government Accountability Office (GAO) report released in May 2019 indicated that differentiated funding streams are necessary and address different needs, gaps, and community priorities.<sup>3</sup> From the report:

“State ECE program officials and CCDF officials reported a number of benefits from using multiple funding sources beyond increased funding, including an increased ability to serve more families from targeted populations. For example, a preschool program official reported that using multiple funding sources allowed the state to serve all of the 4-year-olds in the state’s highest need communities. Another preschool program official reported that the program planned to use multiple funding sources to maintain enrollments once the program’s Preschool Development Grant ended. Thus, integrating state funds with federal and local funds may have broadened the effect and reach of quality services provided to children and families.”

Further, the GAO report indicated that when programs sought to mirror the “characteristics of Head Start” children and families benefited from the alignment:

“Sharing characteristics with Head Start or CCDF may have had benefits for low-income families and children in states with such programs. Benefits may have included covering additional

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<sup>3</sup> <https://www.gao.gov/assets/700/698961.pdf>

eligible beneficiaries, filling gaps in services provided, or complementing federal programs. For example, some program officials reported that their state ECE programs mirrored Head Start’s eligibility rules so that they could extend access to children who were eligible for Head Start but not enrolled.”

While efficiencies can and should be sought at every level of the system, it is imperative that our nation’s child care and early learning system must **continue to feature multiple entry points and multiple program options in order to meet the needs of all children and families.**

Finally, one of the most significant challenges facing child care, Head Start, and other early childhood providers is access to facilities financing and support. Research has long held that safe, open, and nurturing facilities lead to better child outcomes.<sup>4</sup> Yet, there is not a clear or simple vehicle for early childhood providers to secure funding and/or financing. **From family child care to center-based child care to Head Start, all providers and, ultimately, children and their families would benefit from the establishment of an early childhood facilities fund.**

## **ADDITIONAL RECOMMENDATIONS**

1. *Prioritize the needs of most vulnerable children and families in any redesigned child care/early learning system by:*
  - a. *Reward states that place a strong focus on equity in their approved CCDF plans with additional funding to reach more children living in poverty and other at-risk children.*
  - b. *Scale trauma-informed care practices in child care settings, professional development and degree preparation programs.*
  - c. *Promote the greater use of community needs assessments to meet the needs of children and families.*
  - d. *Promote higher and uniform minimum standards for health and safety.*
  - e. *Extend a prohibition on suspension and expulsion in any program receiving CCDF funds*
2. *Expand the universe of programs and funding streams being examined in any future proposal to include the benefits of integrating various non-early childhood funding streams, especially those that work directly or in partnership with community early childhood providers.*
3. *Prioritize public understanding and support for infant toddler service through the Early Head Start model.*

As the administration considers making changes to the broader early childhood system, NHSA and the Head Start community offers three additional sets of recommendations for your consideration.

### **Prioritizing the most vulnerable children and families**

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<sup>4</sup> Sussman and Gillman. (April 2007) *Building Early Childhood Facilities* NIEER, New Brunswick, NJ. Accessed online at <http://nieer.org/wp-content/uploads/2019/10/BuildingEarlyChildhoodFacilitiespdf.pdf> & Kritchevsky, S., Prescott, E., & Walling, L. (1977). *Planning Environments for Young Children: Physical Space*. Washington, DC: NAEYC. Proscio, T., Sussman, C., & Gillman, A. (2004). *Child Care Facilities: Quality by Design*. New York: Local Initiatives Support Corporation.



A wealth of research has laid stark that health and education gaps between low-income and at-risk children and those in middle and upper-income families start from birth and are pronounced by the time they reach their first day of kindergarten. These early years are a critical period of brain development when children are most shaped by both positive and adverse childhood experiences (ACEs). Children living in poverty are most at-risk of experiencing ACEs that can have long-lasting impacts on their life trajectories.

An equity and multigenerational approach also focuses on adult education, skill-building, jobs, and economic opportunity. The lack of equity among children cannot be divorced from a lack of equity among their parents/caregivers. A focus on equity supports adults and in turn helps local economies.

Multigenerational early childhood programs can improve prized child and family outcomes, only if the children most at-risk are enrolled and programs are regulated, funded and trained to address their needs. As such, we recommend the administration:

- **Reward states that place a strong focus on equity in their approved CCDF plans with additional funding to reach more children living in poverty and other at-risk children (e.g. foster care children, children in families or geographies impacted by the opioid crisis).**
- **Prioritize scaling trauma-informed care practices in child care settings, professional development and degree preparation programs.** Congress is currently considering a significant increase in Head State and Early Head Start funding to allow for an expanded programmatic focus on trauma-informed care and expand the number of children served in Head Start settings. If approved, the next several years offers a window of opportunity for Head Start and child care to partner to scale trauma-informed practices. Professional development and degree preparation are critical tools to embed evidence-based approaches, sensitive to needs including trauma-informed care, into programs.
- **Promote the greater use of community needs assessments that would put the needs and voices of families front-and-center in child care planning and resource allocation.**

Research shows that a lack of equity has a negative impact on on key child outcomes. As such, we recommend the administration:

- **Promote *higher and uniform* minimum standards for health and safety.** Absent a more elevated floor, the most at-risk children will suffer. Further, the early childhood system will never meet equity goals and funding streams will not be able to be effectively integrated across settings. Elevated standards will allow for the kind of seamless integration across programs and classrooms that benefits children, families and programs.
- **Extend a prohibition on suspension and expulsion to any program receiving CCDF funding.** The Head Start community celebrated in 2016 when the HSPPS prohibited expulsion and strongly advised against suspension. Extending this prohibition to any child covered by federal funding would promote equity and alignment between the HSPPS and state laws. The lack of such uniform policies contributes to inequities in opportunity that disproportionately impact children of color and at-risk children most in need of quality early learning environments.

### **Expanding Access to Other Services**

Based on Head Start's 55 year history as a comprehensive child development program, children and families will face incredible barriers to achieving success without access to a wide variety of health, nutrition, mental health, and other services. Stronger integration of programs addressing the healthy development of children and their families including Medicaid, child welfare, substance abuse and mental health, and Maternal Infant Early Childhood Home Visiting (MIECHV) among others, is required at all levels of government. As such, we recommend the administration:

- **Expand the universe of programs and funding streams being examined in any future proposal to include the benefits of integrating various non-early childhood funding streams.** It is not feasible to expect small child care programs or even a state's early childhood community to build and cement these partnerships on their own. Greater federal and state direction needs to be provided to build cross-sector, cross-funding stream partnerships.
- **Fully fund and incentivize programs to provide a broader range of services either directly or in partnership with community providers.** Just as programs cannot be on their own to work across systems, they are well-positioned to build local partnerships with the right direction and support.

### **Prioritizing Infant-Toddler Care**

The most active time of child development is prenatal to age three. In addition to supportive family policies that are administration priorities, such as paid family leave, we recommend a focus on helping the child care and early learning field make a successful transition to effective birth-to-five programming, with a strong focus on infant and toddler access and quality. Within this transition phase, we recommend the administration:

- **Commit to making Early Head Start the “backbone” of any national commitment to accessible and affordable child care for the prenatal-three years age range.** Early Head Start has demonstrated success over 25 years. More recently Early Head Start-Child Care Partnerships have offered clear success cases, expanding access and promoting equity within child care settings. Early Head Start is valued by parents and has delivered gains for children that are well-documented. It is time to make a national commitment to a significant expansion of Early Head Start funding and standards. An increased national commitment to Early Head Start would provide the foundation necessary to expand access, promote affordability, and build much-needed equity for our youngest children.
- **Gather cost data and elevate field and public understanding of what it takes to both: a) fund and support aligned high-quality birth-to-five models, and b) help programs make the transition from serving preschool-age children to serving infants and toddlers to better meet community needs.** These analyses should place an emphasis on models that offer comprehensive services, promote equity and have demonstrated success in workforce preparation and retention. In doing so, philanthropy should be a key partner in this effort and we support the Pritzker Children's Initiative goal of expanding high-quality services nationally to at least one million

low-income families with children prenatal to age three by 2023, among other philanthropic and privately-funded efforts.

## **CONCLUSION**

On behalf of the National Head Start Association, thank you for your focus on increasing access and affordability to high-quality child care and early learning programs. While a comprehensive solution to the challenges facing our nation's early childhood system is not easily identified and implemented, we are pleased to continue to work with the administration, states, communities, and our child care partners to help identify problems and develop solutions that transform the financing model of child care and early learning in the United States. We appreciate the opportunity to provide comment and for your time and consideration. We look forward to further dialogue and supporting our shared goals through ongoing partnership.

Sincerely,

A handwritten signature in black ink that reads "Yasmina Vinci". The signature is written in a cursive style with a large, looped initial 'Y'.

Yasmina Vinci

Executive Director, National Head Start Association