



July 9, 2019

Administration for Children and Families
Office of Planning, Research, and Evaluation
330 C Street SW
Washington, DC 20201

Comments on Head Start (HS) Connects: Individualizing and Connecting Families to Family Support Services (84 FR 28303)

On behalf of the Head Start community, the National Head Start Association (NHSA) thanks the Administration for Children and Families for the opportunity to comment on the proposed collection of case studies via *Head Start Connects: Individualizing and Connecting Families to Family Support Services* (Federal Register Vol. 84, No. 117, Page 28303-4. Tuesday, June 18, 2019).

NHSA is a nonprofit organization committed to the belief that every child, regardless of circumstances at birth, has the ability to succeed in life. NHSA is the voice for one million children and their families, 250,000 staff, and 1,600 Head Start grantees.

Since 1965, building partnerships with families has been a central ideal of Head Start, and the long-term and intergenerational benefits that Head Start children experience may well be rooted in part in increased family stability and security as a result of their experiences in the program. NHSA is glad to see that this study is designed to gather impressions from families, staff, and program leadership about successes and obstacles in meeting the needs of today's Head Start families. Given Head Start programs' focus on enrolling the most vulnerable families in their communities, the lessons that may come from this and future studies will add value to the entire early learning sphere and, in particular, will highlight the importance of the Head Start model for those families who need more than pre-K in isolation or fragmented services. The recommendations below have been crafted to enhance the quality, utility, and clarity of the information to be collected.

Thank you again for the opportunity to provide feedback on the proposed collection for Head Start Connects. We believe that research and continuous learning are at the core of the Head Start's ability to serve our nation's most vulnerable children and families with the highest quality of care and service. If you have questions, please contact me at yvinci@nhsa.org.

Sincerely,

Executive Director
National Head Start Association

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The National Head Start Association, an independent membership organization, advocates on behalf of the entire Head Start community and provides training and resources to Head programs nationwide.

Family Support as a Field

Every Head Start leader knows a program and its services rely on the quality and commitment of staff. To enhance the information gathered for case studies of family services, and to inform the development of a future larger study, it is essential to understand the family services workforce. In addition to asking about duties and titles, we suggest expanding section 6 of the Administrator/Manager interview to ask about the average salary or salary range for a family service worker. For staff interviews, we suggest asking follow up questions about which degrees or professional development opportunities staff feel have been most beneficial to their work with families. Given the emotional impact of working with families who may be dealing with trauma and crisis, we also recommend interviewing staff about their wellness and burnout, whether they're engaged in reflective practice, and what staff mental health resources they have access to or would like access to. These staff do some of the most important work of Head Start, and insight into their experiences is central to understanding Head Start's work with families.

Barriers to Family Engagement

Families eligible for Head Start often face many interconnected challenges of poverty, and these may be compounded by the current climate that may be suppressing engagement with safety net programs among immigrant and asylum-seeking families, even for their citizen children. We suggest expanding question 20 of the Administrator/Manager interview about families who don't take up services to include answer choices for concerns about possible negative consequences of accessing safety net programs as well as language barriers, either within the referral process or the services available. Also, in the repeated question about barriers in the Parent Interview (15, 22, 29, etc.) the answer choices suggest that the barriers to parents receiving services are their fault for not communicating or not seeking out support. While these are possibilities, we recommend including external as well as internal factors, such as limited time, lack of transportation, limited local resources, lack of culturally or linguistically appropriate resources, perceived negative consequences of accessing safety net programs, etc.

Linking Family Engagement to Outcomes

Head Start programs collect and use a tremendous amount of data, and linking data can add value. In the Administrator/Manager interview, we suggest expanding question 35 about Management Information Systems to ask if family services information is linked to children's records in the program's database, or if this information is linked externally to the MIS, and if this data is used to explore relationships between family needs or services and child outcomes.

Considering Program Structures

Numerous questions in the administration and staff interviews ask whether support services are "provided by your Head Start program or...by external community providers" in varying language. In the 2017-2018 PIR, more than 450 Early Head Start providers and about 550 Head Start providers - including several Migrant and Seasonal Head Start providers - identified as Community Action Agencies. These grantees in particular, as well as some non-profits, typically offer services within their parent agencies that are described here as family support services. These agencies are often well poised to coordinate family services across different programs, and there may be particular lessons to be learned from such agencies. In order to enhance the clarity and utility of responses to questions about service provision, we recommend that they be rephrased to ask whether services are provided by the Head Start program, another program operated by the same parent agency, or an external community provider.

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When selecting programs to participate in the case studies, care should be taken to include a representative number of Community Action and multi-service agencies. When planning the Community Provider interview with Head Start administrators, it will be important to be clear if interviewees may or should include training, job placement, housing, or other programs within the same parent agency. Some questions in the Community Provider Interview may need to be reworded accordingly.

Considering Terminology

One complexity that can arise given the necessary variation in Head Start programs is that a “family support worker” in one community may be called a “family service worker” or “family advocate” in another. As the planning surveys do ask administrative staff to identify the local term for this role early in the process, we recommend that the response be used to populate parent interviews to ensure the questions are clear to families. In addition, “community provider” is sometimes used to refer to non-Head Start child care providers, and care should be taken to define its use in this context.

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