



September 7, 2008

Ms. Patricia E. Brown,  
Acting Director, Office of Head Start  
1250 Maryland Ave SW  
Washington DC

Dear Ms. Brown:

On behalf of the California Head Start Community, serving over 100,000 children and families we wish to express our distress and apprehension regarding the Office of Head Start's Program Information HS-08-05, issued September 3, 2008.

The California Head Start Association's Board of Directors robustly supports accountability and effective stewardship of Head Start's precious federal resources. We are proud of the solutions that emerge from open and purposeful dealings with our Region IX Office of Head Start, State Collaboration Office and Regional Technical Assistance Network. We strongly support that programs should be at full-enrollment throughout the program year. However, the level frustration over this PI is significant and broad. All over California, grantees large and small, operated by a number of organizational structures have voiced tremendous frustration with PI -08-05 in just a few short days. At this time we ask that your office withdraw PI-08-05 for 180 days to provide more in-depth discussion with the field and consultation with Congressional leaders.

We find in our brief discussions about this Program Instruction, if left as-is, it may have far reaching and harmful consequences to the mission of our local programs. The outcome of this guidance forces programs to be 100% enrolled, 100% of the time – this is unworkable in real world application and forces programs to “short-change” core clients – We believe OHS must consider:

- Working with at risk populations, including homeless children and the requirement to enroll the child/family with the greatest need first is the biggest concern. Even with a very current waiting list, families are often difficult to contact immediately. Often it requires over a week to connect with the family to set up an enrollment appointment and then if the family turns out to not be eligible for the program we must start the process over with the next family on the list.
- Head Start programs that are in collaborations in order to provide full day services or enhanced programming in order to maximize state and federal dollars to reach the most children need time to develop the enrollment of a new family with the partner agency/program. State & Federal Collaborations have complex eligibility and require increased scrutiny. In California alone it is

estimated over 30,000 children are enrolled in State Federal Full Day/Full Year models. In California, programs utilizing State funds to maximize access need to use the Centralized Eligibly List (CEL) to select families- increases the length of time needed to enroll new family. These enrollment management systems are new and full of challenging administrative tasks to achieve compliance.

- Enrollment systems are very complicated in Head Start and the 30 day period allowed for a reasonable approach. Squeezing the time an agency has will reduce the quality of the enrollment process and basic steps in screening, assessment, eligibility certification will be at risk. We feel certain it is not in the best interest of Congress, Office of Head Start, local grantees or children and families if the enrollment process results in compromised outcomes.

We believe the Program Instruction is in error by directing programs to fill vacancies identified near the end of a program year immediately:

- Head Start is not designed to be a short term 5 week program. The comprehensive nature of the Performance Standards necessitates a longer relationship with children and families to fulfill the basic guidelines including screenings with appropriate follow-up and family plans.
- Children require a certain adjustment period to group situations and it is not developmentally appropriate to put them in for a short period of time and then end the opportunity.
- Children in Head Start, near the end of the program year, have grown in their skills, formed personal relationship with each other and for those moving on to Kindergarten, prepared for the upcoming transition over time. Inserting a young child into this situation may affect their sense of security.
- Filling slots near the end of the program year will dilute the PIR information that is presented to OHS and used for Congressional, public and program consumption.

In closing we re-state our request that your office withdraw PI-08-05 for 180 days to provide more in-depth discussion within OHS, with the field and consultation with Congressional leaders to ensure every Head Start dollar is utilized for children with the greatest need and supports our collective goals of accountability and effective stewardship of Head Start's precious federal resources.

Cordially,

Kay Wernert, President

Edward Condon, Executive Director

CC: Congressman George Miller, Congressman Buck McKeon