



September 8, 2015

Ms. Colleen Rathgeb  
Director of Policy and Planning  
Office of Head Start  
1250 Maryland Avenue SW  
Washington, DC 20024

Dear Ms. Rathgeb:

Results for America is committed to improving outcomes for young people, their families, and communities by helping drive public funds toward evidence-based, results-driven solutions. We are grateful for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) (Federal Register, Vol. 80, No. 118, Friday, June 19, 2015) for the Head Start program. We applaud the U.S. Department of Health and Human Services (HHS), the Administration for Children and Families, and the Office of Head Start (OHS) for creating an NPRM that relies heavily on evidence and that will help Head Start programs move towards a model of continuous program improvement that focuses more on outcomes and less on compliance.

Results for America has recognized Head Start's commitment to using data and evidence by highlighting the Designation Renewal System in our federal [Invest in What Works Index](#). In July 2014, we also released "[Renewing Head Start's Promise: Investing in What Works for Disadvantaged Preschoolers](#)," which outlines recommendations for leveraging data, evidence, and evaluation to improve outcomes for children and families. The federal index and the report's recommendations helped inform the recommendations that we make below to build on the strong foundation laid out in the NPRM:

- We strongly support the language in the proposed regulation that requires programs to "implement a process for using data to identify program strengths and needs, develop and implement plans that address program needs, and continually evaluate progress towards achieving program performance goals." We believe this approach can be groundbreaking in improving the quality of programs available to children and their families. To ensure that this new policy is implemented effectively, we encourage the Department to prepare a plan to help programs put this new approach in place, including guidance and technical assistance that will model best practices and system building approaches at the local level.
- The proposed rules place a much-needed emphasis on an effort to "revise and reduce regulations that place bureaucratic burden on programs that interfere with program quality." Yet, there are several sections where very specific requirements are still in place that may interfere with program quality as programs focus on complying with the bureaucratic burdens (e.g. regulating a number of days on nonattendance rather than

identifying attendance trends, limits on non-coaching professional learning models, and safety and hygiene practices).

- While some of this specificity may be necessary to protect children, we recommend that programs be given appropriate flexibility to use research, evidence, and data to design program-specific systems that will best meet their needs.
- We applaud OHS for its increased focus on evidence, both in the design of the standards and in the new requirements for grantees. We believe that requiring programs to use home visiting curricula and classroom-based curricula that are evidence-based and have shown evidence of effectiveness will improve outcomes for children. We particularly support the language requiring grantees to show evidence that demonstrates the need for locally designed program options, as this can help promote a different and more objective frame for grantees evaluating their program design and for OHS as it makes grant awards.
- Because a continuous improvement approach will be new to much of the Head Start community there is some danger that program monitoring will not move away from a compliance focus as quickly as needed to reach full implementation of the new approach. We encourage HHS to develop guidance for program monitors that helps them understand how to evaluate systems and to evaluate cycles of continuous improvement. We are encouraged by this new approach, and hope that over time it will expand from the program level to OHS itself. We believe program quality and positive outcomes will increase the more that HHS refines its program management system to build a model federal system of continuous improvement.

By taking these steps to strengthen an already strong set of proposed rules, OHS will send a clear signal that investing public resources in evidence-based practices, policies, and programs is the new norm and an essential way to improve outcomes for our nation's young people.

Results for America is committed to helping improve the Head Start program through informed uses of data and evidence at every level. We continue to develop ideas and recommendations to that end and look forward to working with the Office of Head Start to advance that shared goal.

Thank you in advance for your consideration of the recommendations in this letter.

Sincerely,



Michele Jolin  
CEO and Co-Founder  
Results for America

cc: Cecilia Muñoz, James Kvaal, Roberto Rodriguez, Naomi Goldstein, Mark Greenberg, Blanca Enriquez