



December 12, 2008

Education Agency Review Team
President Elect Barack Obama Transition Team
Washington, DC

To Whom It May Concern:

Thank you for the opportunity to share our comments on developing a re-designation process for Head Start grantees. As a network of 160 neighborhood centers across the country providing Head Start services to approximately 30,000 children, United Neighborhood Centers of America shares the goal of promoting high-quality Head Start services.

This letter discusses specific information on the challenges and immediate action required of Secretary-Designate Daschle to improve the quality and effectiveness of America's Head Start programs. Our recommendations serve the goals of promoting a uniform, valid, and transparent Head Start grantee re-designation system. To advance these goals, United Neighborhood Centers of America recommends that the Head Start grantee re-designation policy:

1. Establish a Re-designation Framework that Relies Only on Uniform Federal Data

The Committee on Re-designation has proposed incorporating non-federal data to determine if a grantee should be automatically re-competed. Head Start compliance standards are not uniform and vary based on a grantee's state, county, and municipality. Automatic Indicators that are currently being considered (ex. bankruptcy laws and licensing requirements) can differ significantly across state lines. Assessments based on non-federal data impose unequal penalties and do not support uniform quality standards. Additionally, since Head Start can only monitor federal compliance, including other standards will create a disincentive for accurate disclosure of those standards which will weaken grantee evaluation. The re-designation process should assess only uniform federal standards.

2. Score Re-competition on a Per-Center Basis

Key Quality Indicator scoring should account for infractions per-center instead of a grantee's aggregate infractions. Many Head Start grantees run multiple centers. Without a per-center accounting, a grantee that runs five centers with four infractions each in a grant cycle would receive a lower rating than a grantee that runs one center that reports 19 infractions during the cycle. To accurately score poor-performing grantees and individual centers, re-competition should utilize a uniform, valid, per-center measurement.

3. Limit Grantee Performance Reviews to Current Grant Cycle

Performance reviews for re-designation should take place at the end of the previous grant cycle and only account for performance based on that specific cycle. During past cycles, a grantee may have faced deficiencies that have since been rectified or the grantee may have been under different leadership. Grantees should not be forced to re-compete based on past deficiencies, however, should re-compete based on their performance during the previous cycle.



The authority to accept new Head Start re-designation policies rests with the Secretary of the Department of Health and Human Services. We ask for your support on these recommendations and the opportunity to advance our shared objective of promoting high-quality Head Start services.

Sincerely,

A handwritten signature in black ink that reads "Helen Eisner". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Helen P. Eisner
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