



June 9, 2003

Mr. Tom Schultz
Administration for Children and Families
Head Start Bureau
330 C Street, SW
Switzer Building, Room 2010
Washington, DC 20447

RE: Comments on the Implementation of the National Head Start Reporting System on Child Outcomes (Federal Register: April 11, 2003, Volume 68, Number 70)

Dear Mr. Schultz:

On behalf of the Hispanic Education Coalition (HEC), an *ad hoc* coalition of national organizations dedicated to improving educational opportunities for over 40 million Hispanics living in the United States and Puerto Rico, we are pleased to submit comments on the implementation of the National Head Start Reporting System (HSNRS). Although we believe that assessment is an important component of quality education programs, we are opposed to the implementation of the HSNRS this September, given the inherent flaws in the current design of the system, particularly for Latino and Limited English Proficient (LEP) children.

The needs of Latino and LEP children are especially relevant to decisions regarding the HSNRS implementation because these children represent a large segment of today's eligible Head Start population, and will become an even greater proportion of the Head Start eligible population in the very near future.

The Latino community is the fastest growing school age population in the nation. As the 2000 Census revealed, Latinos are the nation's largest ethnic minority group and a very young population, with nearly 12% of Latino children younger than age five. Moreover, a Head Start study conducted in 2000 found that Spanish is the second most common language spoken in Head Start. This same study also noted that in the period from 1993 to 1998, the overall growth of LEP children in Head Start grew by 4%, and of these same children the largest increase was seen among native Spanish-speakers (36%).

The HEC strongly believes that Head Start is already a successful program that can be strengthened by strategic improvements through increased accountability systems that provide accurate information on child outcomes and portray the full range of gains made by Head Start children and families. We support the Head Start Bureau's (HSB) intention to build upon the success of Head Start by ensuring high quality programs and positive outcomes through the design of a rigorous and sensible accountability system.



Furthermore, we support the stated goals of the HSNRS to provide teachers with additional information regarding children's progress and enhance program monitoring. We think these are laudable steps toward making certain that Head Start meets the demands of a growing, diverse student population.

However, the HEC is concerned that the HSNRS as currently designed, contains serious flaws that seriously jeopardize the above-mentioned goals. More specifically, we are concerned that the HSNRS limits the Head Start program's ability to demonstrate the educational gains made by LEP children. Additionally, we fear that programs will be burdened by the accommodations required for testing LEP children. Taken together, these factors could have the collateral effect of creating a disincentive for LEP children to be served by Head Start; programs could decide that assessing these children is a complex endeavor and, thus not worth the risk of possible corrective action.

The HEC has been made aware that the HSB intends to use the first year of HSNRS implementation to build an infrastructure for appropriate assessment at the local level. In addition, we also understand that the HSB intends to refrain from using the data yielded from HSNRS as benchmark scores until the validity and reliability of the measures for LEP students can be certain. These decisions are important steps towards ensuring that programs are not discouraged from serving LEP children and will undoubtedly lead to the improvement of the HSNRS. The HEC hopes to see this information communicated to programs as quickly as possible given the rapid implementation timeline.

The HEC outlines below our specific concerns and recommendations for improving the HSNRS so that it achieves the HSB's intended goals. As a preliminary matter, however, we would caution the HSB against moving too quickly in implementing the HSNRS. The fact is, while assessments are clearly a necessary part of education and related programs, the state of the science is not sufficiently high to allow for the use of assessments as sole measures of outcomes for individuals or entire programs. The National Research Council, the Joint Standards on Educational and Psychological Testing, and the testing industry confirm this. The science is clear, that assessments lose whatever accuracy they may have when one assesses very young children. In addition, if the assessment will include LEP children, then accuracy is further compromised. Thus, the HEC believes that for the HSNRS to provide useful information that will lead to program improvements and enhanced accuracy, it must be implemented in a way that is not only cognizant of these facts, but only after these issues are sufficiently resolved.

Concerns with the HSNRS

- **Limited Scope of Indicators.** Foremost, the HEC is concerned that the HSB decided to focus HSNRS on a narrow set of educational indicators to measure Head Start program effectiveness. We believe that this decision jeopardizes the very program aspects that have led to Head Start's long-standing status as the nation's premier early childhood education program. As the President noted in the implementation of increased accountability mechanisms in the No Child Left Behind Act, "that which does not get tested, does not get taught."

Therefore, the failure to include a broader set of indicators in HSNRS represents a departure from the Head Start program's focus on comprehensive developmental services, and sends a message that health, parent involvement, family literacy, and nutrition activities are at best, less important and at worst, not important at all. The HSB must take into account that HSNRS could potentially have the collateral effect of reducing the scope of essential Head Start services and, therefore must put in place the necessary safeguards to maintain its current scope.

- **Training for Assessors.** The HEC is concerned that the plan to train assessors is vague with regard to all children and particularly for LEP children. The HSB has indicated that programs may identify one individual as the lead trainer and that a "train the trainer" approach will be utilized to prepare local teachers and staff to collect data for HSNRS. Foremost, limited training for test administrators is a threat to the inter-rater reliability of the measures. More specifically, we believe that reliability is even further threatened by the expectation that Spanish language assessors will receive training primarily in English, and then be expected to make adjustments for LEP children.

The HSB must report on the specific training plan for assessors that will be utilizing the Spanish-language assessment tools. Given the enormous implications that this reporting system will have related to program improvements and possible corrective actions, it is imperative that sufficient attention is given to the training of assessors. Even if the battery of tests for HSNRS were perfectly designed, poorly trained assessors could have a deleterious effect on the reliability of the findings.

- **Appropriate LEP Assessment Development.** Given the paucity of early childhood assessment tools, and research citing the limited reliability and validity of existing LEP assessment tools, the HEC is concerned that the HSB is using application from the FACES survey as evidence of the reliability and validity of the LEP measures. We are unconvinced that application from FACES provides the necessary evidence for consistency and accuracy, and concerned it will therefore yield data that further places the HSNRS on shaky ground with regard to LEP populations. Moreover, the HEC believes that the LEP assessment tools must be normed and designed for representative samples.

In addition, it is unclear to the HEC whether or not the proposed LEP assessment tools holistically capture all aspects of language, are sensitive to sociolinguistic variety, and are accurate for assessing bilingual children, who may possess varying degrees of knowledge depending on the language in which a particular question is asked. Furthermore, it is important to note that the literature clearly points to the need to use multiple measures for LEP children because no one measure can adjust for the above mentioned considerations. The HSB should not move forward until it provides evidence that these critical issues have been addressed, which should include making public the recommendations of the Technical Workgroup subcommittee on Language Diversity.

- **Appropriate Testing Protocols.** The HEC is concerned that the HSB has failed to address the limited capacity of programs to assess children in Spanish due to a lack of bilingual teachers and staff. We believe that it is imperative that assessors have established rapport and training in early childhood education while also being Spanish language proficient. Furthermore, the HSB must make clear how a Spanish-language assessor's level of Spanish proficiency will be determined so as to ensure the reliability of the data that is collected.

In addition, the HEC is concerned that the HSNRS is not sensitive to programs that have aligned their curricula with best practices literature by providing bilingual and Spanish language instruction. The decision to utilize the Spanish language assessment only in the fall if the child made sufficient gains in the English language fails to capture gains made in the Spanish language across all of the educational indicators. This can potentially send the wrong message to programs that the goal of Head Start is to be "ready to learn in English." There is ample research pointing to the benefits of native language literacy instruction and bilingual education as a means to achieve sustained positive educational outcomes for all children including English language acquisition.

Lastly, the HEC is concerned that HSNRS makes use of the Simon Says and Art Show assessments as a warm-up activity for English language dominant children and does not make available to LEP children a culturally and linguistically appropriate warm-up exercise as a means for the assessor to establish rapport with the child. We believe that program teachers would have a strong indication of the primary language of the children prior to assessment for HSNRS, and could reasonably make this accommodation for LEP populations. The HSB must strengthen the testing protocols for LEP children and be willing to delay assessment of them until these critical issues are addressed.

Recommendations

The HEC understands and agrees with the HSB's intention to develop an assessment system to improve services, including for LEP populations. However, the system the HSB chooses to use must be the strongest possible. Thus, given the concerns noted above, we believe that the recommendations outlined below would move toward significantly strengthening the HSNRS by allowing for consideration of the unique needs of LEP children. Interim, affirmative actions to this end include:

- Delaying assessment of LEP cohort for at least one year to allow for needed critical planning activities.
- In developing the HSNRS, the HSB should not dictate the use of, specific assessment tools. The HSB should continue to allow the use of local assessment tools and when appropriate incorporate them into the HSNRS.

- Providing funds for a regional grants program that allows grantees to contract with local experts to advise on selection and implementation of assessment tools for LEP children.
- Designating a Head Start Bureau liaison who will be accessible to grantees during the design and implementation phase of assessing the LEP cohort.

Absent these elements, we are skeptical that the HSNRS will lead to improved accountability or program services to Latino and LEP children and families. In fact, we believe it would be irresponsible at this time to move forward with the HSNRS since it is inherently flawed as currently designed. If the HSB intends to begin implementation of the system without rectifying these problems, it would be doubly irresponsible to use these results for high-stakes purposes, such as de-funding programs or taking corrective actions. If the HSNRS is not altered as outlined above, at best, the HSB risks losing an opportunity to increase access to quality early childhood education and care for the growing Latino community; at worst, it can foreclose such opportunities to another generation of vulnerable children and families.

We thank you for considering our views.

Sincerely,



Melissa Lazarin
National Council of La Raza
HEC Co-Chair



Maryln McAdam
National HEP-CAMP Association
HEC Co-Chair

On behalf of:
Intercultural Development Research Association
Hispanic- Serving Health Professions School Inc
National Association for Bilingual Education
National Hispanic Medical Association
National Migrant & Seasonal Head Start Association