

December 21, 2010

The Honorable Kathleen Sebelius
 Secretary
 U. S. Department of Health and Human Services
 Office of Head Start
 1250 Maryland Avenue SW
 Washington, D.C. 20024

**Re: National School Boards Association (NSBA) Comments on the
 Department of Health and Human Services' Notice of Proposed
 Rulemaking for Establishing a Head Start Designation Renewal System
 Docket ID ACF-2010-0003**



*Working with and
 Through our State
 Associations, NSBA
 Advocates for Equity
 and Excellence in
 Public Education
 through School
 Board Leadership*

Dear Secretary Sebelius

The National School Boards Association (NSBA), representing over 95,000 local school board members with and through our state school boards associations, is pleased to offer comments on the notice of proposed rulemaking (NPRM) for establishing a Head Start and Early Head Start designation renewal system.

NSBA recognizes the many benefits of high quality early childhood programs, including improved school readiness and narrowing achievement gaps that can exist even before kindergarten. Further, approximately 15 percent of Head Start and Early Head Start programs have an operational relationship with public school districts that are grantees or delegate agencies. NSBA supports increased accountability to ensure program quality and believes that the re-competition of funds will help to improve the overall performance of grantees and ensure that only well-qualified providers participate in the program.

We are offering several comments for ensuring that the development and implementation of the designation renewal system will build in flexibility for individual grantees, avoid unintended consequences, and produce the best substantive outcomes for young children. These include:

- Involving School Districts in the Review Process

NSBA recommends that the Administration for Children and Family (ACF) involve local school district representatives in reviewing program grantees for re-competition. School districts and schools are in a unique position to assess the effectiveness of providers since children who have attended these programs frequently transition to public school systems.

- Providing Flexibility in the Review Process

NSBA recommends that the designation renewal process take into consideration the unique circumstances of school districts and other providers. For example, the licensure and overall oversight of school districts may be different than for other providers, making application of the proposed re-competition system difficult to comply with.

Office of Advocacy

- *Earl C. Rickman, III*
President
- *Anne L. Bryant*
Executive Director
- *Michael A. Resnick*
Associate
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- Six-Month Final Notice to Grantees

The NPRM provides for a final notice to grantees of the designation renewal decision at least six months before expiration of their current grant. We are aware that a preliminary notice of the review results would be provided, but nevertheless, NSBA is concerned that the six-month timeline, if it fell during the academic year, does not provide sufficient time for grantees that are school districts to prepare for re-competition and/or identify alternatives to avoid service disruption for children. NSBA recommends that grantees be able to request an extension beyond the six months to prepare for re-competition should they be required to do so.

- Appeal Process

NSBA is concerned that there is no proposed process through which grantees can appeal ACF's decision for re-competition. An appeal process is critical in ensuring the review system is valid and reliable. We recommend that such a process be put in place.

Thank you for the opportunity to comment. Questions regarding our recommendations can be directed to Lucy Gettman, Director of Federal Programs, at 703-838-6763 or by e-mail lgettman@nsba.org.

Sincerely,



Michael A. Resnick
Associate Executive Director