



CALIFORNIA RURAL INDIAN HEALTH BOARD, INC.

The following are points that concern California Rural Indian Health, Inc. as a Head Start Grantee. Tribes across the country are facing similar concerns. We will present on the following Head Start topics:

1. Cultural Teacher Qualifications
2. CLASS and Designation Renewal System
3. HS/EHS Slot Conversion
4. AIAN Specific Research
5. Federal Monitoring
6. Staff Qualifications - Professional Development
7. Tribal Head Start Facilities
8. Office of Head Start Training Materials
9. ACF/OHS Head Start Tribal Consultation Process
10. Quality Improvement Fund

Cultural Teacher Qualifications

Imperative to the survival of Tribal languages and culture is engaging traditional speakers and cultural transmitters within HS/EHS programs as teachers and teacher assistants. The current regulations for meeting the qualification requirements for education coordinators, teachers and teacher assistants will produce burdensome challenges for Tribal programs. For example, many of the language speakers are elders and are not interested and are unlikely to seek a degree for meeting the teacher/teacher aid qualifications. Many Tribes do not have the resources to employ a third person in the classroom as a language and/or culture teacher.

Tribes should determine the proficiency of staff or Tribal members to work with infants/toddlers and preschoolers.

1. The initial work with young children is critical in the teaching of belonging. Entry level teachers in Tribal communities who are the carriers of the community and family culture should be waived from the requirements of possessing an infant/toddler Child Development Permit &/or Early Education AA at date of hire. Tribes need to nurture their own members and community members to be teachers of their children.
2. Programs are concerned about how to utilize their Tribal language speakers in full immersion classrooms given the requirements for certified or credentialed teachers.

Recommended OHS Action:

3. Since the teacher qualification requirements are a nationwide target, Office of Head Start (OHS) should consider waiving the teacher qualifications for teaching staff so that Tribes can employ qualified (as determined by Tribes), and sometimes certified, language speakers and/or cultural transmitters in their Head Start and Early Head Start programs.
4. If Tribes and states have established a program for certifying American Indian and Alaska Native speakers as qualified teachers, Office of Head Start should accept such individuals as meeting the teacher qualification requirements (Arizona, California, Oregon and Washington).

CLASS and Designation Renewal System

The Classroom Assessment Scoring System (CLASS) is the observation tool that Office Head Start (OHS) encourages programs to use when assessing teacher's capabilities in the classroom to implement curriculum. We note that the Head Start Act of 2007 does not specifically require the use of the CLASS, but that programs use an evidence-based tool to assess their teaching staff.

American Indian/Alaskan Native (AIAN) Tribal grantees are concerned and hold issue with the use of CLASS generally, and more specifically, as a measurement for determining if a grantee goes into the **Designation Renewal System (DRS)** process. The DRS system forces Head Start Grantees, regardless of the grant period, to lose their non-competitive status and placed them into competition for future funding. The CLASS tool, as applied makes Tribal grantees susceptible to being placed on DRS and even possibly losing funding completely. This destabilizes grantee's ability to meet the objectives of the Head Start – helping disenfranchised children and families.

The CLASS tool, though "evidence-base" is not a tool that took into consideration AIAN children during its research phase, and therefore the reliability and validity relative to education activities and teacher performance is highly suspect as applied to Tribal Head Start grantees. The tool does not include cultural or linguistic applications of implementing curriculum by the teachers. The tool, for the purposes of Tribal grantees, is bias in its use as Office of Head Start Monitors/Auditors are not training to work with Tribal programs. In combination, the tool and the monitors'/auditors' lack of knowledge, give scores that are in the lowest 10% causing many Tribal programs to be placed on a DRS.

Programs who are otherwise in FULL compliance, find themselves in DRS because of the lowest 10% trigger which is determined after the monitoring year has been completed even if they met the minimum threshold score. We strongly recommended the removal of the lowest 10% provision, maintaining current minimum thresholds, and increasing the cultural and linguistic awareness and competency of CLASS observers.

Recommended OHS Action:

5. Eliminate the arbitrary 10% criteria of the CLASS evaluation system and its tie to the OHS self-imposed 25% goal in 1304.11 of the Head Start Performance Standards.
6. Low CLASS threshold scores should be treated as non-compliance rather than a deficiency. OHS should then implement a follow-up review of CLASS.
7. Identify and use proficient reviewers that demonstrate knowledge, expertise and experience in working with AIAN populations and have demonstrated abilities to work with diverse cultural and ethnic populations.
8. Provide additional resources and supports for bringing the AIAN grantees up-to-speed on implementing and using CLASS. Additional funds to support the purchasing of CLASS materials, attending training programs, and added additional funding to the CLASS contract for the logistics and facilitation of training events.
9. Establish a formal grievance process for challenging CLASS evaluations not conducted appropriately.
10. Exempt AIAN grantees from CLASS until it has been tested and shown to be valid and reliable in AIAN populations.

HS/EHS Slot Conversion

In the past few years, many agencies providing Head Start and Early Head Start services have been considering converting Head Start slots into Early Head Start slots due to the changing needs in their communities. While ACF/OHS has a process in place to convert slots, it can take, depending on the region, a year or more to complete - harming the planning necessary to effectively provide services. The Act offers special provisions for American Indian and Alaska Native (AIAN) grantees. An AIAN grantee that operates both an Early Head Start program and a Head Start program may reallocate funds between the Early Head Start program and the Head Start program **at its discretion and at any time during the grant period involved**, in order to address fluctuations in client populations (Section 645(d)(3) of the HS Act and 1302.20(c) of the HSPPS). Any AIAN grantee that exercises its discretion to reallocate funds is asked to notify its OHS Regional Office prior to the effective date of such reallocation. Current procedures for converting slots interfere with a Tribe's sovereign right of self-determination and how to best serve the needs of their community.

Recommended OHS Action:

11. Section 645(d)(3) of the HS Act, 1302.20(c) of the HSPPS, and Program Instruction 14-02 states that AIAN grantees who operate both HS/EHS may reallocate funds between the programs at its discretion. OHS should not require AIAN programs to follow all the requirements of the slot conversion process.
12. Create a process for any grantee that operates Early Head Start and Head Start to convert the two grants into one birth to five grant to facilitate the seamless conversion of slots between HS and EHS.

American Indian Alaskan Native (AIAN) Specific Research:

The Department of Health and Human Services, Administration of Children and Families and the Office of Head Start have demonstrated over a good number of years (20-30) that it was remiss in meeting the administrative requirements stipulated in numerous (7) Head Start Acts as Amended relating to the research/development for AIAN specific research. The U.S. Congress's intent in placing Indian specific research requirements in the Acts was to assist DHHS and its agencies in making informed decisions regarding the targeted Indian population, funding formulas, condition and lack of appropriate facilities, effects of rural and remote service delivery areas, learning and development styles of young diverse Indian children, effects of services, etc. There has been limited or no production on the research items as required by the 2007 Act let alone previous Head Start Acts.

Recommended OHS Action:

13. A research status report be developed by OHS and distributed widely to Tribal grantees, Tribally Controlled Colleges/Institutions, National Indian Head Start Directors Association and the National Indian Collaboration Office.
14. Sufficient research dollars be allocated by OHS for actualizing its required charge to conduct specific research affecting Tribal Grantees prior to other areas in the Act or OHS internal priorities. For example:
 - **Funding allocations** and distribution formulas, including cost of providing services with the rural, isolated and remote locations of American Indian and Alaska Native populations
 - Determine the **eligible Indian population** throughout the United States including populations served by current Indian Head Start Agencies including the need for services
 - **Identification of culturally appropriate and relevant curricula, assessment,** and screening tools and provide guidance on selecting curricula based upon price, adaptability and their research grounding
 - **Overall study of Indian Head Start, Sec. 649(k).** The Act requires a study or studies, undertaken in collaboration with Tribes, the collaboration director and the National Indian Head Start Directors Association, addressing a wide range of issues.
 - **Delivery Study. Sec. 650(a)(14).** The Act also requires a study of the delivery of Head Start programs to Indian children living on and near Indian reservations and to children of Alaska Natives.

Federal Monitoring:

There needs to be a continued effort to assure cultural competence for federal reviews and monitoring activities. Since the inception of the Federal On-Site Review Process, Tribal grantees have consistently voiced concerns over the lack of knowledgeable and skilled federal on-site teams, the lack of professionalism of team leaders and reviewers, and the lack of cultural sensitivity of teams. Many reviewers lack an understanding of Tribal governments and the unique relationship they have with the federal government, let alone have the expertise inclusive of cultural awareness and

responsiveness of diverse cultures. More effort should be made to recruit culturally competent reviewers from the Native community.

Recommended OHS Action:

15. Ensure the federal monitoring contractor provides cultural competence training regarding the uniqueness of Tribal governments and cultures
16. Increase recruitment from the Native community.

Staff Qualifications - Professional Development:

Tribal Head Start programs have great difficulty in recruiting and retaining teachers and teacher aides.

Difficulty in recruiting qualified applicants with an existing Child Development Associate (CDA), AA or BA in Early Childhood Education.

- **CDA Challenges:** Potential employees are not aware of the CDA credential prior to seeking employment with Head Start. To expect that programs can recruit and hire someone with an existing CDA is not possible. It is very rare that a job applicant already has a CDA. It is only after the program hires the employee that the CDA process can begin. Finding mentors and other support staff that are easily accessible to Tribal communities as part of the CDA process is a difficult task for many programs.
 - **AA/BA Challenges:** On many of the Tribal lands there are not institutions of Higher Learning where potential employees can obtain an A.A. or B.A. in Early Childhood Education (ECE). Many reservations are located in extreme rural areas making distance learning institutions inaccessible for rurally located Tribal communities.
17. **Teachers earn required degrees and then are able to take higher paying positions.** Head Start employees who obtain a degree are able to seek employment with the local school system or other early childhood programs for a higher paying wage. Due to inadequate funding levels, Tribal Head Start Programs are unable to compete with the wages that other schools and ECE programs can offer to employees. They are able to earn a higher wage with fewer requirements creating perpetual vacancies within the Head Start program.
 18. **Funding to maintain qualified teaching staff.** The Head Start Act continues to increase the educational requirements for teaching staff but does not provide adequate funding levels to Tribal programs that would allow programs to increase current wages to be competitive and to improve starting wages/wage scales of the program. Provide funding for programs to create Step-Increase Levels to pay competitively for staff that has both a degree and years of experience.
 19. **Minimum wage increases.** Many cities and states have voted to raise their minimum wage with increases over the next few years. This coupled with increasing healthcare costs will force programs to adjust their entire pay scales to avoid wage compression (when the lowest paid workers, such as substitute teachers, edge closer to the higher paid employees with degrees or even managers). Without increased funding or an option to renegotiate a program's cost per child, many programs will face reducing already overburdened staff and/or compromising program elements – or worst case, shutting down.

Recommended OHS Action:

20. Grant waivers for staff that do not meet the degree requirements until funding levels can be increased to allow for competitive pay of qualified staff.
21. Allow programs to renegotiate their cost per child to allow for the proper compensation and retention of qualified staff.

Tribal Head Start Facilities:

Tribal Head Start grantees have reported the need for facility improvements that include both major and minor renovations as well as the need for new construction. Often there is a lack of alternate facilities in rural and remote areas, forcing grantees to spend significant portions of their budget to maintain environmentally safe facilities. Tribes, especially those located in remote, isolated areas are unable to afford costs associated with the upkeep for structures used for Head Start purposes. In FY2015 the Office of Head Start submitted their Report to Congress on American Indian Alaska Native Head Start Facilities. In it OHS reported that:

22. 36% of facilities had documented concerns including worn interiors, cracked ceilings, poor insulation and overall deterioration due to the impact of adverse weather conditions.
23. 37% of facilities had concerns related to building materials and conditions, such as mold, leaks, flooding, and gas or sewage odors.
24. 15% of centers have HVAC systems that are improperly ventilated and experience difficulty in regulating temperature. Some centers attempt to augment systems with window AC units and space heaters, which add energy costs and can pose fire safety risks.
25. 14% of the restrooms are not age-appropriate (sized for adults, not children), or the ratio of restrooms to children is too low.

Twenty-five percent of the centers assessed will be 40 years of age by 2020. Investing in short term maintenance and repairs rather than renovations or new construction designed for the long-term lends itself to inefficient spending. Centers that are rapidly deteriorating due to old age, and/or have a major structural issue are likely contributing to other patterns such as under-enrollment, a higher cost per child, and issues AIAN programs encounter when expanding services and partnering with child care providers. The cost to renovate or perform outstanding maintenance and repair of the 506 centers nationwide is estimated to be \$69.64 million.

Recommended OHS Action:

26. Create opportunities for grantees to apply for funding for renovation or construction of facilities.
27. Inform grantees of other funding sources for facility improvements or construction such as private foundations or other federal or state programs.
28. Provide a separate space for facility topics regarding construction and renovation requirements, resources including how to prepare an application for facilities funding, training and funding opportunities on the Early Childhood Learning and Knowledge Center (ECLKC) website.

Office of Head Start Training Materials

Materials often created by the National Centers do not take into consideration the different requirements for Tribal Head Start programs. The materials are often revised as an afterthought. This can result in confusion and misinformation to programs, especially those new or struggling directors who rely on these materials to support their programs.

Recommended OHS Action:

29. To address this issue, we propose that the National Centers employee staff who have knowledge and experience with Tribal programs to develop appropriate materials for Native Head Start programs. At best, create a workgroup of Tribal Head Start Directors to give input into the design of training materials.

ACF and OHS Head Start Tribal Consultations Process:

AIAN grantees appreciate the opportunity Tribal consultations potentially offer for expressing issues and concerns affecting the delivery of HS/EHS services for “better meeting the needs of Indian, including Alaska Native, children and their families (Head Start Act, 2007).” Tribes see Head Start, inclusive of Early Head Start, as the foundation for building future leaders within Tribal communities through its preparation of young children and their families in life-long learning, growth and development.

Since the inception of the formal Tribal Consultation in 2008, the consultation sessions have not been productive, have been inconsistent in their facilitation, and have been less than effective in producing outcome results directed at improved early childhood services within Tribal Communities.

The Secretary of DHHS is charged with implementing the Head Start and Early Head Start Tribal Consultation process. We request that the Secretary ensure federal employees with policy-making authority attend the consultations so that the “government-to-government” relationship with federally recognized Tribal Governments is recognized and maintained. When consulting with Tribal leadership is delegated to non-policy responsible individuals it is disrespectful to leaders of Tribal Nations.

Tribal grantees are seeking continued improvement in the Tribal consultation process where funding allocations, distribution formulas and other issues affecting the delivery of Head Start and Early Head Start services are openly discussed and resolved within a timely manner.

Recommended OHS Action:

30. Assign federal employees with policy-making authority to attend and dialogue with Tribal leadership within ACF and OHS. Sending subordinates alone will only serve to further weaken the consultation process.

31. Have an open discussion with Tribal leadership to evaluate how the consultation process can be more effective to ensure satisfaction and true government to government relationships. (Add as an agenda item during the Tribal consultation)
32. Sufficient notice (at least 60 days) of scheduled consultations needs to be given to Tribal leadership to plan their attendance. When consultations are announced one at a time throughout the year it is difficult to determine which location would be most convenient.
33. Reports of the consultations should include a record of topics discussed with clarifications and intended action steps.

Additional Ask: Prioritize the Quality Improvement Fund:

We ask that you prioritize funding the Quality Improvement Fund (QIF). Per the 2007 Head Start Act, this will allow the necessary flexibility for our programs to address our greatest needs. The following are needs that without funding allocations will continue to reduce grantees ability to fully serve the Tribal Head Start communities

- Increased duration of services, to support working families.
- Enhanced staff training – specifically Trauma Informed Care.
- Community wide planning.
- Doubling hours for Mental Health Consultants.
- Changing statute to allow for families in the 180-200 above poverty to access Head Start – helps with under enrollment issues.
- Allow for Head Start teachers with higher education to tap into a Loan Forgiveness Act.
- Parent Engagement – increase funds to help parents become licensed providers.
- Strengthened transportation safety

Office of Head Start
Official Responses to California Rural Indian Health Board, Inc.

This document responds to the written testimony provided by the California Rural Indian Health Board, Inc. during the US Department of Health and Human Services (HHS) Region 9 Tribal Consultation in Sacramento, CA on June 19, 2019

Office of Head Start Responses by Topic

1.) Cultural Teacher Qualifications

- a) The importance of language and culture within American Indian Alaska Native (AIAN) programs has been communicated by our programs for as long as there has been a Head Start. With the 2016 revision of the Head Start Program Performance Standards (HSPPS), requirements for culturally and linguistically appropriate environments and practices that reflect the community served became explicit, including specificity for tribes should they choose to integrate language preservation, revitalization, restoration or maintenance of the tribal language. The Office of Head Start recognizes the challenge of securing staff who are both proficient in tribal language and culture and meet the statutory requirements for teacher qualifications. It is an allowable cost to employ a cultural lead/teacher full time or part time and such an individual may be in addition to the program's education staff. When a program lacks resources to employ an additional individual to fulfill this role, they should work with their program specialist and TA provider to identify alternatives.

2.) CLASS and the Designation Renewal System

- a) As in prior years, CLASS was a top area of discussion during 2019 tribal consultations across the country. . In April of 2019 OHS posted a Notice of Proposed Rule Making (NPRM) in the federal register which was open for public comment for a period of 60 days. The Classroom Assessment Scoring System (CLASS) was among the areas for which comments were solicited. Feedback and suggestions received during the open comment period, including that from tribes, will be reviewed to inform potential revisions to Head Start Program Performance Standards and the Designation Renewal System (DRS).

Additionally, in response to testimony received during tribal consultations in 2019, OHS convened meetings with many of the individuals who raised CLASS related issues in consultations. These discussions produced ideas on how OHS can better implement the Classroom Assessment Scoring System (CLASS) in AIAN programs. Between August and October 2019, several teleconference calls occurred between OHS Senior Leadership and individuals from within AIAN programs to identify potential improvements. These conversations are ongoing and we plan to implement changes that that provide Region XI grantees the best opportunity to be successful and also continue to meet Office of Head Start's statutory requirements (Per the 2007 Head Start Act the inclusion of a valid and reliable tool to assess classroom quality in Head Start reviews is required)

OHS delayed all FY20 AIAN CLASS reviews until the spring of 2020 to allow time to plan and, implement improvements. We will notify tribes about changes in AIAN CLASS observations as soon as possible.

In cases where a grantee feels there was a divergence from protocol in conducting CLASS reviews, we encourage the grantee to submit this in writing to the Director of the Office of Head Start, Dr. Deborah Bergeron. This can be submitted formally via the Head Start Enterprise System (HSES).

3.) HS/EHS Slot Conversions

- a) Per 1302.20(c)(4) of the HSPPS a tribal grantee operating both HS and EHS may, at its discretion, reallocate funds between programs based on fluctuations in age eligible populations in the community. If a grantee is currently a Head Start only grantee, a formal request and approval process must be completed prior to converting HS slots into new EHS slots.

4.) AIAN Specific Research

- a) OHS is working in conjunction with the Office of Planning Research and Evaluation (OPRE) on a study of Region XI Head Start programs (American Indian/Alaska Native Family and Child Experience Survey (AI/AN FACES 2019) to initiate targeted data collection on AIAN Head Start children, families, teachers, and programs. The goal of this outreach and data collection is to provide descriptive, nationally representative information on the characteristics, experiences and development of Region XI Head Start children and families, and the characteristics of the Head Start programs and staff who serve them. For more information, please visit:
<https://www.acf.hhs.gov/opre/research/project/american-indian-and-alaska-native-head-start-family-and-child-experiences-survey-faces>

OPRE also funds a cooperative agreement titled the Tribal Early Childhood Research Center. The TRC supports a variety of research with tribal communities, including three active communities of learning focusing on native culture and language, assessing the need and unmet need for early care and education services in AI/AN communities, and understanding the use of screeners in AI/AN communities. For more information, please visit:
<http://www.ucdenver.edu/academics/colleges/PublicHealth/research/centers/CAIANH/trc/Pages/TRC.aspx>

OHS continues to explore additional avenues and data sources to ensure decisions are data driven and the needs of AIAN communities are known and factored into decision making.

5.) Federal Monitoring

- a) It is a priority of OHS to recruit, train, and deploy high quality reviewers to support Head Start monitoring across the country. OHS and Region XI will continue to work with monitoring teams to ensure training is provided to reviewers selected to conduct monitoring reviews of AIAN programs.

Recruiting reviewers from within AIAN communities remains a high priority. In 2019 OHS is increasing our recruitment methods and expanding our outreach. Region XI is developing a strategic approach to recruiting reviewers from across the country. This approach will begin with a “3 pronged” approach that consist of direct outreach to AIAN programs, outreach to tribal colleges, agencies, organizations, and partners in and around tribal reservations, and stepped up recruitment at conferences and events. Our goal is to ensure all potential candidates are aware of the avenues available to serve as reviewers or CLASS observers.

6.) Staff Qualifications – Professional Development

- a) OHS recognizes the challenges face by programs across the country to recruit and retain qualified teaching staff. OHS encourages programs to utilize any and all avenues available for advertising vacancies and recruiting staff. This includes but is not limited to local recruitment at community event, posting vacancies electronically throughout the community and with local partners, agency/organization websites, social media, and OHS's early childhood learning and knowledge center (ECLKC) website via the "job center" page. OHS believes that many tribes face unique barriers to recruiting staff with required credentials. Some programs solve this by hiring staff in paraprofessional positions, such as bus monitor or substitute teacher, and providing them with experience and education support leading to a CDA and, for preschool, eventually an Associate's degree. This provides several benefits as such staff are likely more representative of tribal culture and language. With such a training program, while some staff may leave for higher paying jobs, it provides a pipeline of qualified new employees.

OHS also recognizes the increases in operation costs for providing Head Start and Early Head Start services. OHS encourages programs to continuously and intentionally revisit community needs and resources to design programs that best meet the needs of children and families and also ensure cost efficient operations that support successful implementation of programs.

7.) Tribal Head Start Facilities

- a) OHS does not receive appropriations specifically for the renovation, purchase, or construction of facilities. However, OHS is able to support agencies/organizations with one-time funding awards to support the renovation, purchase, or construction of facilities used primarily to provide Head Start services. OHS encourages programs to utilize systems of ongoing monitoring to make determinations about the health and safety needs of their facilities. For facility projects such as major renovation, defined as renovations in excess of \$250,000, purchasing or constructing a facility, OHS encourages programs to work with their assigned Program Specialists, Grant Specialists, and TA to complete the required application requesting funding and completion of a 1303 Pre Award Facilities Checklist. This checklist identifies all necessary documentation required to be considered for potential funding. Minor renovations and repairs, as defined in 45 CFR §1305.2, do not require prior approval unless a budget modification is necessary to utilize existing funds from another budget category.

8.) Office of Head Start Training Materials

- a) OHS has recognizes that materials used in trainings have a huge impact on the ability of grantees to not only know and understand federal regulations but take advantage of the flexibilities the updated Head Start Program Performance Standards (HSPPS) allow for tribal grantees. Many of the existing AIAN specific materials are located on the Early Childhood Learning and Knowledge Center (eclkc) website. To support improved support to our tribal grantees OHS utilizes many resources including the Collaboration Office's Tribal Advisory workgroup and input from grantees through our T/A network.

9.) ACF/OHS Head Start Tribal Consultations Process

- a) Tribal Consultation is typically facilitated by Directors within ACF and OHS. In FY2019 each of the tribal consultations OHS participated in included a Director to support ACF's facilitation for matters pertaining to Head Start. This practice is one we will continue to always strive for in future consultations to ensure individuals with policy making authority are engaging directly with tribal leadership.

In FY2019 OHS scheduled tribal consultations in conjunction with HHS, ACF, and applicable agencies and program offices. One main reason for this was to cut back on the amount of different consultations tribal leaders had to attend each year. Our hope is that having multiple offices together allow for a wider range of tribal issues and concerns to be covered at each consultation. OHS is currently working with ACF and HHS to confirm tribal consultations in FY2020 and hope to be able to announce the schedule in early 2020 to allow for maximum participation. Once confirmed OHS will notify Head Start and Early Head Start grantees.

10.)Quality Improvement Fund

- a) The FY 2020 Budget does provide \$250 million for Quality Improvement Funding for all Head Start grantees. The Head Start Act outlines the types of on-going investments that grantees can make with the Quality Improvement Funds. Congress specifically encourages grantees to prioritize on-going efforts and activities that support a trauma informed approach in their programs. These allowable activities align with most of the needs and investments outlined in California Rural Indian Health Board's testimony. Specifically, increased duration to support working families, enhanced staff training to support trauma informed approaches, community wide planning, increasing mental health consultation, supporting teachers with higher education, enhancing family engagement and strengthening transportation would all be allowable investments with these funds. The Office of Head Start will be releasing a Program Instruction with more details on this funding and holding a webinar in the near future.
- b) The testimony of Quality Improvement Funds also suggests changing the Head Start Act to allow for higher income families to access Head Start. However, these funds do not allow for any changes to eligibility as required by the Head Start Act.