CORRESPONDENCE

2017 – 2018 E-RATE APPROVAL

Twila Steward

Subject:	FW: eRate Approval: 2017-2018
Importance:	High

From: Maria Crespo
Sent: Wednesday, January 10, 2018 8:58 AM
To: Deloris Johnson
Cc: Dennis Gniewek; Maria Crespo
Subject: eRate Approval: 2017-2018
Importance: High

Good Morning: Please see below. Nothing was disallowed this year and the full amount requested was awarded. Thx.

FCC Form 471 Application Number	171045599
Billed Entity Number (BEN)	16045101
Billed Entity Name	THE AGRICULTURAL AND LABOR PROGRAM, INC.
Billed Entity FCC RN	0018062687
Applicant's Form Identifier	2017 ALPI Form 471
FCDL Date	Jan 4, 2018
Approved Amount	$70,640.10
Denied Amount	$0.00
Notification Generated By	mcrespo@alpi.org
Notification Generated On	01/04/2018 1:44 PM EST

ELECTRONIC WAGE REPORT

Social Security Online   **Electronic Wage Reporting (EWR)**

www.socialsecurity.gov   **EWR Home** | **E-mail a Wage Reporting Expert** | **Keyboard Navigation** | **Logout**

Upload Formatted Wage File

Confirmation - Your File Was Received

Name: **DENNIS JOSEPH GNIEWEK**

Steps: 1. Before You Start   2. What's in the File?   3. Submit Your File   **4. Confirmation**

Your submission was successful. Use your browser menu to save or print this acknowledgment of receipt for your records, as proof of your filing date, and to keep a record of the Wage File Identifier for checking the processing status.

Receipt Date: 01/10/2018 01:51 PM Eastern Standard Time   Wage File Identifier (WFID): 506ZQB

Submitter EIN : 591634148   Your File Name: W2REPORT.zip

File Size: 17,553 bytes (17.1 Kb)   Assigned File Name: 160E1695FD81A686_2018506ZQB01

Check the size of your file. How?

If it is not the same as the file size shown on your computer, there may have been a problem with transmission. Please contact BSO Technical Assistance at 1-888-772-2970. For TDD/TTY call 1-800-325-0778.

What to expect:

- You can check the status online at any time. However, allow 1-6 weeks for Social Security to complete the processing of your file, depending on the time of year.
- If you receive a Resubmission Notice from SSA, please follow the instructions contained in the notice to resolve any problems with your submission.

Thank you for submitting your report using Business Services Online.

| Submit Another File | EWR Home |

Have a question? Call **1-800-772-6270** Mon. - Fri. 7AM to 7PM Eastern Time to speak with Employer Customer Service personnel. For TDD/TTY call **1-800-325-0778**.

CSBG PROGRAM UPDATES

DEO **FLORIDA DEPARTMENT** *of* **ECONOMIC OPPORTUNITY**	**CSBG Program** **Information Memorandum**	**IM-17-02**

PROGRAM:	Community Services Block Grant (CSBG) Program
SUBJECT:	**Important** Program Updates
DATE:	December 15, 2017

I.   Purpose and Objective

The purpose of this IM is to provide a summary to the CSBG Network in Florida on upcoming important changes and updates to the CSBG Program. It must be noted that DEO is **not** providing policy directives or implementation of any new policies at this time, but rather ensuring that CSBG eligible entities in Florida remain aware of administrative and policy changes to be implemented by the State CSBG Office.

2.   Summary and Background

ROMA Next Generation Modules 2-4 of the CSBG Annual Report collects agency level data and is based on the State CSBG Reporting Period. The State of Florida for these purposes collects data using the federal fiscal year dates October 1 – September 30. Data collection for the full CSBG Annual Report starts in FFY18. The first complete submission of the CSBG Annual Report is due March 31, 2019.

Transitioning from the IS Survey to the CSBG Annual Report requires changes in the CSBG work plan and quarterly Florida Outcomes for Community Assistance Services (FOCAS) report. The changes are necessary to be in alignment with the new CSBG Annual Report. These revisions also ensure the correct information is being collected throughout the program year which will increase accountability and validity of the data.

3.   Current Situation

The 17SB agreements have been extended through September 30, 2020. The midyear budget modification allocating carryover funding and new FFY 18 program year funding will be released

upon receipt and approval of the modification, work plan, supplemental budget forms, and board minutes/agenda approving the work plan and supplemental budget forms. The funds will be released via Notice of Funds Available (NFA). DEO will send two sets of supplemental forms.

Both sets consist of the following forms:

1. New FFY18 work plan
2. 2017 CSBG Modification Instructions for Supplemental Forms
3. Supplemental Form G – "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion"
4. Supplemental Form I – "Subrecipient Information"
5. Supplemental Form J – "Budget Summary"
6. Budget Detail Form
7. Subcontractor information and Budget Summary
8. Secondary Administrative Expenses, budget summary, and the detailed budget forms.

The applicable supplemental forms will need to be completed and submitted to DEO for approval in order for the NFAs to be issued releasing the funds. To help clarify the steps needed to complete the work plan and supplemental forms with the timeframes follow the instructions below:

Midyear Modification Carryover Funds:

1) Timeframe: Budget the carryover funds through March 31, 2018.

2) Complete the new work plan for the time period of January 1, 2018 – March 31, 2018.

3) Complete the supplemental summary and detailed budget forms.

4) Complete and submit only the applicable supplemental forms which represent a change in the original agreement.

5) Submit the board minutes approving the supplemental budget forms and work plan to your grant manager. *In lieu of the approved board minutes, the agency may submit the board agenda showing the work plan and supplemental budget forms are on the agenda for review and approval.* Once the board has met and approved the work plan and supplemental budget forms submit the board minutes to your grant manager.

6) Submit completed applicable supplementary forms to your grant manager by Friday, **January 5, 2018.**

7) Once DEO approves the work plan and supplemental budget forms a NFA will be used to release the funds.

FFY2018 Funding:

1) Timeframe for budget: **April 1, 2018** through **March 31, 2019**.

2) Complete new work plan for the time period **April 1, 2018** through **March 31, 2019**.

3) Complete the supplemental summary and detailed budget forms.

4) In the event changes have occurred since completion of the midyear modification, complete applicable supplemental forms and submit only the supplemental forms which represent a change in the original agreement.

5) Submit the board minutes approving the supplemental budget forms and work plan to your grant manager. *In lieu of the approved board minutes, the agency may submit the board agenda showing the work plan and supplemental budget forms are on the agenda for review and approval.* Once the board has met and approved the work plan and supplemental budget forms submit the board minutes to your grant manager.

6) Submit completed applicable supplementary forms to your grant manager by Friday, **March 2, 2018.**

7) Once DEO approves the work plan and supplemental budget forms a NFA will be used to release the funds.

As always, if you have questions or concerns, you may contact us at DEO at 850-717-8450, or by email.

/jd

2018 DANYA MONITORING UPDATE

Twila Steward

Subject: FW: FY 2018 Monitoring UPDATE

From: DLH Corp [mailto:ohsmonitoring@danya.com]
Sent: Tuesday, October 17, 2017 4:05 PM
To: Elizabeth Young
Subject: FY 2018 Monitoring UPDATE

AGRICULTURAL & LABOR PROGRAM INC, THE

Grant Number(s):

04CH4739

Dear Grantee,

This email is to inform you that your agency, as specified above by grant number(s), is not currently scheduled to receive a Focus Area 1, Focus Area 2, or Classroom Assessment Scoring System (CLASS®) review in Fiscal Year 2018. However, please keep in mind that the Office of Head Start reserves the right to schedule reviews at any time as the need arises.

Although you are not currently scheduled for a review, we encourage you to get acquainted with AMS 2.0 and the changes to monitoring that align with the new Head Start Performance Standards (HSPPS). A number of resources are available to support you:

- Early Childhood Learning & Knowledge Center at https://eclkc.ohs.acf.hhs.gov/federal-monitoring

- FY18 Aligned Monitoring System 2.0 Virtual Expo at https://onlinexperiences.com/Launch/Event.htm?ShowKey=43448

If you have any questions, please contact DLH Danya at hsreviewplanning@danya.com.

DLH Danya Scheduling Team

DLH Corp, 8737 Colesville Road, Suite 1100, Silver Spring, MD 20910

SafeUnsubscribe™ eyoung@alpi.org
Forward email | Update Profile | About our service provider
Sent by ohsmonitoring@danya.com in collaboration with

ACF REPORTING REMINDERS

(Standards 1320.102 & 1320.90)

ADMINISTRATION FOR
CHILDREN & FAMILIES
Office of Head Start | 330 C St., SW, 4ᵗʰ Floor, Washington DC 20201 | eclkc.ohs.acf.hhs.gov

January 3, 2018

Dear Head Start Grantees and Delegate Agencies,

I hope the holiday season was filled with joyful times with your loved ones and some respite to refuel.

As the New Year begins I want to bring attention to two requirements that have, in some cases, resulted in unnecessary and potentially detrimental actions taken by the grantee. First is the reporting requirement found in CFR 1302.102 (d)(1)(ii) requiring grantees to report immediately or as soon as practicable any significant incidents affecting the health and safety of program participants. Second is Standards of Conduct, CFR 1302.90 (c)(1)(i)(ii)(A)-(I),(iii),(iv),(iv) and (v), describing the positive strategies adults must implement when interacting with children, a list of prohibited actions endangering the health and safety of children, and ensuring no child is left alone or unsupervised.

Over the past year, reports of child health and safety incidents have increased. We are uncertain if the increased reporting is due to compliance with CFR 1302.102 (d)(1)(ii), whether more incidents are occurring, or both. We suspect it is due to the increased reporting, and we want to acknowledge grantees' compliance with the requirements. However, the Office of Head Start (OHS) has observed unintended consequences of these requirements that we want to bring to your attention. In some cases, grantees are reporting minor incidents that do not require self-report. More importantly, some agencies immediately terminate staff involved in incidents, which may not be, in all cases, the best course of action for the child and staff.

Reporting

OHS has zero tolerance for any situation that places a child in harm's way. Grantees' hyper-vigilance in keeping every child safe and secure and feeling loved every moment while in their care is foundational to Head Start and Early Head Start programs. However; some grantees may believe they are required to report all health and safety incidents, even when they are not significant incidents and do not harm or endanger children. Grantee characteristics like climate, locale – urban, rural, remote, shared facilities including playgrounds, level of security systems, just to name a few – vary greatly, and it would be impossible for the Office of Head Start to issue a definitive list of what are considered non-reportable insignificant incidents. To determine which incidents are reportable, grantees should work with management, governing bodies, Health Advisory Committees, mental health consultants, and local or state licensing agencies to develop guidelines that differentiate between staff, consultant or volunteer practices, and/or behaviors that need improvement but do not harm or endanger children, versus reportable practices or behaviors that harm or endanger children.

Personnel Actions

Personnel policies and procedures must include appropriate penalties for staff, consultants and volunteers who violate the Standards of Conduct. Many grantees move to immediate termination of staff involved in these violations. We are concerned grantees believe OHS expects termination of staff who violate the Standards of Conduct and will view it as correcting the violation. This perception is not correct. OHS expects that each incident will be carefully assessed and appropriate actions will be taken holistically, not just with the individual involved in the incident. Grantees should determine whether they have adequate ongoing support, supervision, and training necessary for staff to succeed. If necessary supports are not ongoing, systemic, and available to staff, consultants, and volunteers working directly with children, the problem is more likely a systemic management weakness, and firing an individual will not correct the problem long term.

Investing additional supports for staff committed to professional development and improvement may be, in some cases, a far better investment than termination. Children and parents may abruptly lose a beloved teacher, which can be disruptive to social and emotional development and erode continuity of care. Additionally, programs then face a period of time when staff are anxious, less experienced substitutes step in, and the likelihood of another incident increases.

We recognize growing and maintaining highly competent staff is a tough job, and not every day will be a perfect day; however, every day a child leaves their Head Start or Early Head Start program they should feel safe, valued, special, happy and bathed in love.

Sincerely,

Ann Linehan
Acting Director
Office of Head Start

NHSA PROPOSED RULE CHANGE/CLASS

Designation Renewal System

N H S A
NATIONAL HEAD START ASSOCIATION

January 18, 2018

Office of Head Start
Attn: Colleen Rathgeb
Director, Division of Planning, Oversight and Policy
330 C Street SW
Washington, D.C. 20024

Re: RIN 0970-AC63

Dear Ms. Rathgeb,

On behalf of the National Head Start Association (NHSA), the nationwide Head Start community, the broader early care and education community, and the undersigned organizations, we are pleased to provide comments in response to the proposed rule change to the "CLASS Condition of the Head Start Designation Renewal System," published by the Administration for Children and Families (ACF) on December 8, 2017 (82 Fed. Reg. 57905).

NHSA is the voice for more than one million children in Head Start and Early Head Start programs across the United States. Recognizing the devastating impact poverty can have on the future success of young children and their families, Head Start and Early Head Start represent a longstanding national commitment to provide early learning opportunities for vulnerable children and comprehensive supports to help their families achieve long-term stability and success. NHSA and the undersigned organizations (collectively referred to in this document as 'we') believe that every child, regardless of circumstances at birth, has the ability to succeed in life if given the opportunity that Head Start offers to children and their families.

The comments below have been developed with the input of Head Start programs across the country that have experienced CLASS and the DRS. The proposals were created through extensive conversations with NHSA's Board of Directors, Head Start state and regional leaders, the broader Head Start community, researchers, and other early care and education experts, and include input from Head Start directors, staff, and families through a national survey with over 1100 responses.

We commend the Administration for seeking comments on forthcoming changes to the Designation Renewal System (DRS), specifically to the way the CLASS observational measurement tool is utilized to determine classroom quality. The successes of Head Start are, and should be, closely tied to its deep commitment to continuous improvement in order to achieve positive outcomes and thus remain accountable to each child and his or her family, their community, and the American taxpayer. Because of this commitment, we stand in strong support of a system of rigorous accountability so long as that system is also equitable, transparent, and effective. The DRS in its current form falls short of fully meeting these basic principles, and reforms are needed before more high-quality grantees are unfairly required to compete for continued funding. In this regard, we agree with one of the proposed changes outlined in the Request for Comment, oppose several others, and propose other reforms, including one based on a concept the Administration offered in the Request for Comment.

1

NHSA

NATIONAL HEAD START ASSOCIATION

Specifically, we firmly support the proposed removal of the lowest ten percent provision of the CLASS condition, but we stand in opposition to the proposals of simply increasing the minimum threshold for the Emotional Support and Classroom Organization domains. We also oppose the proposal to remove the minimum threshold for the Instructional Support domain and, in its place, allow the Secretary to set an absolute minimum threshold annually. Instead, we propose a new approach to the CLASS condition for competition that places Head Start grantees into one of three zones (Competition Zone, Quality Improvement Zone, and High Quality Zone) as determined by a 15-point system that weights and combines all individual CLASS domain scores into a single score.

NHSA, together with the undersigned parents, staff, programs, associations, and organizations, offer the following response to the Request for Comment.

Background of the DRS

The DRS was first established in the Head Start for School Readiness Act of 2007 as an additional system of accountability for Head Start and Early Head Start. Specifically, the Act called for the creation of a system to determine "if a Head Start agency is delivering a high-quality and comprehensive Head Start program that meets the educational, health, nutritional, and social needs of the children and families it serves, and meets program and financial management requirements and standards."[1] In cases where the agency was determined to not be providing high-quality and comprehensive services, the agency would have to compete in a grant making process in order to retain its Head Start and/or Early Head Start grant.

Since its first implementation in 2011, several reports have been conducted on DRS by NHSA and the Administration. The section below outlines the impacts of the DRS on Head Start as identified by these NHSA and Administration reports and discusses the transition of the Head Start program from a compliance-driven system to a system of continuous quality improvement and data-driven decision making. Collectively, these reports demonstrate the quality of Head Start and the positive impact of the DRS. However, the reports also clearly indicate that DRS reforms are needed, specifically to the conditions for competition.

NHSA's Report on DRS
While the Head Start field welcomed the idea that poor-quality grantees should be replaced by alternative, stronger providers, the biggest obstacle in the implementation of the DRS has been the disconnect between the conditions of competition and program quality.

In September 2015, NHSA released a report, "Analysis of the Designation Renewal System: Cohorts One to Three," which examined the experiences and results of competition for both grantees and their communities. The 2015 report found that the most common conditions that caused grantees in the first three cohorts to compete were the deficiency condition and the

---

N H S A

NATIONAL HEAD START ASSOCIATION

CLASS condition. The report further found that the assignment of a deficiency often did not effectively consider the severity of its finding, fluctuating CLASS scores that led to arbitrary competition, and the pervasive perception that any grantee could be placed in competition for a minor incident at any time.

Specifically, the report found that across the first three cohorts of grantees who were placed into competition, 74% had their grants restored in full or in part. However, there was significant variation in the percentage of grants that were restored, depending on which condition led to grant competition. For example, 83% of grantees competing due to the lowest ten percent provision of the CLASS condition had their grants restored while only 63% of grantees with multiple deficiencies got their grants back.

According to the report, there were a number of reasons that explained the high rate of grants being restored. First, because some programs competed due to less severe or systemic concerns, many of those programs were ultimately able to demonstrate high quality in their grant applications. Second, long commitment and familiarity with Head Start enabled Head Start programs to deliver services and engage families and communities more effectively than other grant competitors.

The report concluded that:

- The DRS does not yet fully meet congressional intent of targeting competition to poor quality grantees.
- Basic reforms are needed to make the DRS consistent, reasonable, and predictable.
- Conceptual reforms are needed to support programs in working toward high quality, not compliance.

Administration's Reports on DRS, CLASS, and Head Start Quality
In November 2016, the Administration released a series of reports that offered insight into the first four cohorts of DRS, the general status of Head Start's quality, the use of CLASS in Head Start, and the impact of the DRS as a system.

One report, "Tracking Quality in Head Start Classrooms," examined data from three cohorts of the Head Start Family and Child Experiences Survey (FACES), and its findings were particularly promising. The report found that average classroom quality in Head Start improved steadily between 2006 and 2014. Fewer classrooms were scoring low in the Instructional Support domain, and more classrooms were scoring in the good or excellent category on the ECERS-R test. Further, the characteristics of Head Start teachers were trending in a positive direction. In short, classroom quality had increased as a result of changes made in the 2007 Head Start Act– including the Designation Renewal System.

The second report, titled "Early Implementation of the Head Start Designation Renewal System: Volume I & II," found that, in general, the DRS was supporting quality improvement in Head Start, but concerns were raised that some conditions, namely the CLASS condition, were not effectively able to identify lower performing programs. This finding aligned with the conclusions

N H S A
NATIONAL HEAD START ASSOCIATION

of NHSA's 2015 report as well as those concerns raised to the Secretary of Health and Human Services in various letters by NHSA, the Head Start community, and a bipartisan group of 19 U.S. Senators.

Transitioning from Compliance to Continuous Quality Improvement
While Head Start has seen improvements in classroom quality between 2006 and 2014, many in the early care and education community point to the focus on compliance and bureaucracy in Head Start as having stymied further growth and improvement. The Administration has sought to address this concern by intentionally seeking to transform Head Start into a system of Continuous Quality Improvement (CQI) through the 2016 revision of the Head Start Program Performance Standards and the update of the Aligned Monitoring System in 2017. While both efforts are still in the early stages, they are promising examples of effective transformation. However, without changes, the current DRS will hinder this transformation because of its punitive emphasis that is at odds with identification and encouragement of rigorous, continuous improvement. The DRS must evolve to match the rest of the Head Start system by moving away from a culture of compliance and toward one of CQI. Making these changes in a timely manner will allow for Head Start programs to focus less on arbitrary or fluctuating benchmarks and more on how to continuously improve service delivery for our nation's most vulnerable children and families.

Recommendations for CLASS Scoring

As previously noted, NHSA, the Head Start community, and the undersigned organizations are supportive of reforming the use of CLASS in the DRS, though not unequivocally supportive of all aspects of the four proposed changes detailed in the Request for Comment.

1. Lowest Ten Percent of the CLASS Condition
We are fully supportive of the removal of the lowest ten percent provision of the CLASS condition. The lowest ten percent provision of the CLASS condition creates an arbitrary, floating line with no direct relation to quality, while penalizing many grantees that score in the proficient range. In a 2016 letter to former Secretary Burwell, a bipartisan group of 19 U.S. Senators led by Senators Lisa Murkowski (R-AK) and Jeff Merkley (D-OR) called for the immediate suspension of the use of the lowest ten percent provision of the CLASS condition in the DRS. The letter (see below excerpt) cited these concerns:

> First, because the 10 percent line is redrawn each year, programs are forced to aim for an unknown and moving target which is very disruptive to planning and innovation. This also means that programs monitored in different years are not subject to the same 10 percent cutoff line. As a result, use of the 10 percent trigger does not appear to meet the requirements of Sec. 641 (c)(8) of the Head Start Act (42 U.S.C. 9836) that the Designation Renewal System be transparent, reliable, and valid. Second, following their CLASS monitoring event, a program must wait until the following school year to learn whether their scores will require them to compete. The operational stress this creates is felt at every level and has contributed to staff turnover in many communities. This delay also does not appear to meet the law's requirements that the DRS renews designations in

NHSA
NATIONAL HEAD START ASSOCIATION

a timely manner. Third, 83 percent of the 140 programs who are in DRS solely for being in the bottom 10 percent of CLASS have won their grants back entirely. Many of these programs received clean monitoring reports and some were only in competition by a fraction of a point in one domain. In short, this trigger is not a transparent or clear measure, it is highly stressful and wasteful for programs – taking away from their ability to focus on their services – and is not accomplishing Congress' goal of identifying and improving low performing programs. The DRS should not trigger Head Start grants to recompete in order to meet a minimum quota – as the 10% effectively does – but should instead effectively differentiate low quality from high quality.[2]

Given the findings of the evaluations and the admission in the Request for Comment that the current use of CLASS "may not be optimally targeting the grantees for competition with the lowest measures of classroom quality," we strongly encourage the Administration to immediately cease using the lowest ten percent component of the CLASS condition of DRS. If there are grantees due to compete because of CLASS scores in the lowest ten percent, we similarly recommend that this decision be reevaluated given recent developments. In short, the Administration's 2016 report raised clear concerns about this component, and it should not be triggering punitive action in the form of grant competition until the new system is finalized and implemented.

Recommendation: Remove the lowest ten percent provision of the CLASS condition described in 45 CFR 1304.11(c)(2).

2. Minimum Thresholds for CLASS Domains

We do not support the second or third proposals in the Request for Comments to simply increase the minimum thresholds for Classroom Organization and Emotional Support domains. Similarly, we do not support the fourth proposal of the Request for Comment that would give the Secretary the power to annually set the absolute threshold for the Instructional Support domain. While addressing some of the concerns of the lowest ten percent provision, the proposal to change the Instructional Support minimum threshold annually does not address the concern that an unknown and moving target is ineffective, disruptive, and stymies innovation. The thresholds for low and high quality should not change yearly because what makes for quality teacher-child interactions does not change from year-to-year. Instead, our alternative proposal would establish a clear connection to grantees' continuous quality improvement while mitigating some of the challenges of the existing system.

As noted earlier, the Office of Head Start has taken action to empower local grantees to be driven by data-informed decision making and continuous quality improvement, rather than solely by compliance. NHSA contends that the CLASS condition of the DRS should be reformed in the same vein. To do this, the high-stakes nature of the current use of the CLASS condition—which causes grantees to compete due to snapshot observations that are shown to not definitively differentiate quality—should be reconsidered. Instead, CLASS scores should be considered against a range of options that determine a need for grant competition, high quality, or a need for

---

[2] Letter from Senators Murkowski, Merkley, et al to Secretary Burwell, July 2016

![NHSA - National Head Start Association logo]

targeted quality improvement. This would create a gradient across scores, much like the current use of noncompliance and deficiency seen elsewhere in the DRS.

15-Point Scoring System

Emotional Support Domain	Classroom Organization Domain	Instructional Support Domain
Low Level: Below 3.99 – 0 points	Low Level: Below 2.99 – 0 points	Low Level: Below 1.99 – 0 points
Mid Level: Between 4.00 and 5.59 – 3 points	Mid Level: Between 3.00 and 4.99 – 3 points	Mid Level: Between 2.00 and 2.99 – 3 points
High-level: Above 5.60 – 5 points	High Level: Above 5.00 – 5 points	High level: Above 3.00 – 5 points

Possible Combinations

13 - 15 points
High Quality Zone
CLASS scores indicate consistent, high-quality teacher-child interactions
5 - 5 - 5
5 - 5 - 3

8 - 11 points
Quality Improvement Zone
CLASS scores indicate a need for quality improvement and targeted support
5 - 0 - 5
5 - 3 - 3
5 - 0 - 3
3 - 3 - 3

0 - 6 points
Competition Zone
CLASS scores justify grant competition at end the 5-year grant cycle
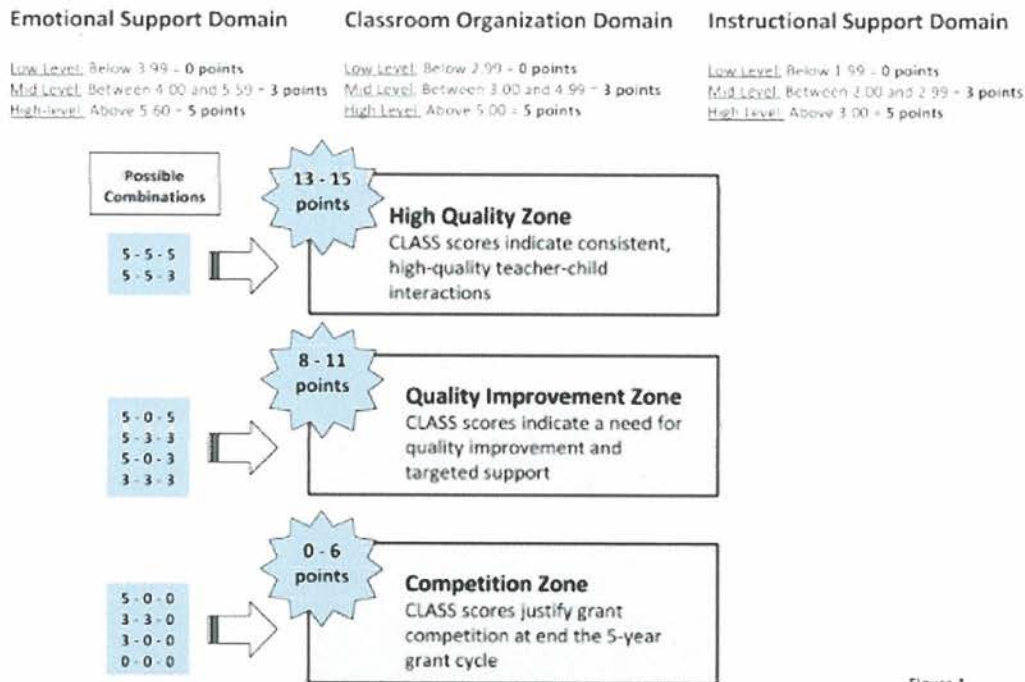5 - 0 - 0
3 - 3 - 0
3 - 0 - 0
0 - 0 - 0

Figure 1

Each zone would have different implications for the grantee. The grantees with exceptional CLASS scores in each domain would reside in the High Quality Zone, indicating that that CLASS condition of the DRS would not trigger competition for the grant at the end of its five-year cycle. Grantees with mid-range scores would be placed in the Quality Improvement Zone, which would impel them to create and implement a quality improvement plan, then be reassessed for improvement. At the point of reassessment, the grantee would have to score in the High Quality Zone or the grant would be placed in competition at the end of its five-year cycle. Grantees scoring at the lower range, would be in the third zone, the Competition Zone, which would cause them to be placed into competition at the end of the grant cycle, much like the current use of CLASS does for grantees falling below an individual threshold.

Under this proposed system, no single domain score would send a grant into competition. Instead, scores would be considered cumulatively, and points would be awarded based on low-, mid-, or high-level scores in each domain. There would be a maximum of 15 points that could be earned. Given the concerns with inter-rater reliability, scoring based on ranges helps to protect against skewed averaging within domain scores being tied to punitive action. The proposed system would not only consider the grantee's CLASS scores more holistically, but it would also allow grantees to demonstrate the effectiveness of their professional development and training systems by requiring them to increase their scores within a grant cycle. In doing so, the system

would effectively meet the stated goal in the Request for Comment to "better balance an ability to drive quality improvement over time."[3]

Implementation of the Proposed System

There are several key factors that are critical to effectively implementing these changes to the CLASS condition. First and foremost, CLASS observations would necessarily need to occur as early as possible in the grant cycle, no later than the end of the second year, in order to provide adequate time for grantees in the Quality Improvement Zone to create and implement an improvement plan *and* make notable progress before being reevaluated through a second CLASS review. When this process would be initiated by receiving a CLASS score that falls within the Quality Improvement Zone, grantees should be given as much information as possible about their scores to inform the formulation of a work plan that addresses specific areas with the greatest need for quality improvement. Then, grantees should be given sufficient time (60 days) to formulate a thoughtful, comprehensive work plan which may include targeted mentor coaching, professional development, or adjusted resource allocation to address areas in need of improvement. These plans could be made in consultation with grantees' respective program specialist. Within 30 days, the Secretary should approve grantee quality improvement plans, including its proposed benchmarks, or indicate areas that need revision.

Additionally, the Head Start Training and Technical Assistance System would need to be amended to effectively support such a quality improvement plan. A second phase of implementation should also consider attaching points to and evaluating grantees' systems of professional development and quality improvement.

Recommendation: Consider CLASS scores on a spectrum which would place grantees into one of three zones (as shown by Figure 1): 1) High Quality, 2) Quality Improvement, or 3) Competition.

Recommendations for CLASS Observations

In addition to the aforementioned recommended changes to the implementation of the CLASS condition, other improvements could be made to further the stated goal of "improving implementation and transparency of the DRS." These changes could be addressed through an updated CLASS Field Guide, increased reviewer fidelity to the Field Guide, and the establishment of a transparent, accessible appeals process.

1. Time of Observations

With regard to the time during which reviews take place, further research is needed to determine whether time of day *or* time of year impacts the scores grantees receive. Grantees observed early in the year are often focused on orientation activities and health screening and assessments, and have not yet reached a point of regularly scheduled classroom operations.

---

[3] NEED CITATION

Recommendation: Efforts should be made to ensure that CLASS observations are done at an optimal time at which scores will be most indicative of usual classroom operations.

2.   New Teachers

New teachers and teachers' assistants need adequate time to acclimate to a new classroom and to one another. CLASS observations should not be done within six months of a teacher or assistant teacher joining a new classroom. Further research should be conducted to determine what amount of time is sufficient enough for CLASS scores to be indicative of a teacher's performance.

Recommendation: New teachers should be given a six-month orientation period before they can be observed for monitoring purposes.

3.   Inter-Rater Reliability

Drastic efforts should be made to examine--and when needed, improve--inter-rater reliability. Especially given the high-stakes nature of the CLASS observations in which grants are placed into competition for less than a tenth of a point, CLASS reviewers should be held to the highest possible standard of reliability. Currently, reviewers must be within one point of a master code to be considered reliable. Thus, reviewers who are deemed reliable may score the same interaction differently, significantly affecting the average score across multiple classrooms and potentially creating negative consequences. These concerns were examined by an Administration report in 2016, which found that:

> Although CLASS observers from both the Office of Head Start (OHS) and the evaluation team met the developer's reliability standards, there were substantial differences in CLASS scores collected by the two teams and substantial variability that could be attributed to raters, raising concerns about the precision of CLASS for the purposes of DRS. (*Early Implementation of the Head Start Designation Renewal System: Volume I*)

Ultimately, "analyses of CLASS scores collected by the evaluation team suggest that variability among raters may account for up to 45 percent of the variability in the CLASS." Considering the small margin between grant competition and grant retention due to the CLASS condition, inter-rater reliability is paramount. To address the concern of inter-rater reliability, OHS should consider and research the potential positive benefits of using multiple reviewers and reliability tests before each monitoring event, and the greater use of technology, including exploring the possible use of video-recorded observations.

Further, the 2016 Administration report found that "no analyses indicated that grantees designated due to low CLASS scores differed from grantees that were not designated on any study measure of quality."[4] If the intention of the DRS is to improve quality and the OPRE report could not find that CLASS was differentiating grantee-level quality, then additional research is needed as to the role of CLASS in the DRS. Specifically, more research is needed to determine which thresholds are proven to indicate increased impact on child outcomes. Then, thresholds in

---

[4] *Early Implementation of the Head Start Designation Renewal System: Volume I*

N H S A

NATIONAL HEAD START ASSOCIATION

the DRS should be set based on the research-based connection of specific scores to child outcomes.

Recommendation: More research should be done to improve inter-rater reliability and increase the understanding of the relationship between thresholds and impact on child outcomes.

4. *Cultural and Linguistic Appropriateness*

Concerns over the use of CLASS in classrooms with cultures unfamiliar to the observer as well as in classrooms with dual language learners should be addressed by creating and requiring observers to attend cultural and linguistic awareness training. For example, much of American Indian and Alaska Native communication is nonverbal, and nonverbal behaviors are largely culture-bound. Teachers' sensitivity and understanding of students' nonverbal behaviors and their competence in sending correct nonverbal messages is an essential part of classroom interactions. CLASS reviewers may be unaware of the meaning or misinterpret these nonverbal behaviors, leading to undeservedly low CLASS scores. The Office of Head Start should consult directly with tribal representatives and leaders in the Indian Head Start community in creating this training to ensure that the trainings are cultural appropriate and authentic.

Further, the use of the CLASS tool in Head Start program with dual language learners often yields artificially low scores in the Quality of Feedback and Language Modeling CLASS dimensions because children learning multiple languages go through a "silent period" (also called the observational or listening period) in which they are primarily listening, observing gestures, and learning environmental cues.5 CLASS observers may observe fewer feedback loops because the children are in the middle of a listening period or simply do not yet have the language skills for back-and-forth exchanges with the teacher. Limited use of expansion strategies also may be observed as teachers focus on ensuring that dual language learners are grasping basic vocabulary and concepts before providing additional information. Considering this differing approach, Head Start teachers may be implementing best practices in dual language learning, while still receiving low CLASS scores.

Recommendation: The Office of Head Start should create a cultural and linguistic awareness training and require CLASS evaluators to attend the training before they conduct CLASS evaluations for monitoring purposes.

5. *Video Observations*

Evidence suggests that CLASS scores derived from video observations are as reliable and valid as those collected by live observers. Video should be collected by federal staff/contractors (not trained CLASS observers) while they are already on-site during existing federal review visits. OHS guidelines should stipulate where, when, and how video is collected, including (for example) standardizing the context of video samples by stipulating that for each classroom, one 20-minute video segment be recorded during full- or small-group activity time, and one include a

---

[5] Caroline Bligh, The Silent Experiences of Young Bilingual Learners, (Sense Publishers, 2014).

transition. Videos would be coded centrally by a small cohort of highly-trained CLASS raters who are able to maintain rigorous reliability. Each classroom's score could be constructed from observations by *at least* two raters (e.g., a classroom's two 20-minute video clips should each be coded by a different rater; and/or two raters' scores on the same clip would be averaged together).

The numerous benefits to using video include:

a. Cost efficiency to help offset the added cost of re-assessments that are recommended for grantees in the Quality Improvement Zone.
b. Increased inter-rater reliability by easily enabling multiple raters to "observe" the same classroom, and requiring a smaller pool of central raters who can more easily maintain more stringent levels of reliability and calibration with one another.
c. Observers who speak the language of the classroom and have received additional training on cultural sensitivity as it relates to the CLASS could more easily and cost-effectively be assigned to code videos from classrooms where the language of instruction is not (always) English or where the populations include children from various cultures (especially in tribal/migrant/seasonal programs).
d. Video recording (a camera on a tripod) is not as invasive or disruptive as live observers.
e. Video could be returned with CLASS scores to grantees in the Quality Improvement Zone to facilitate reflection and professional development around the CLASS tool and teachers' own practice.
f. Video could serve as critical documentation on which to base an appeals process.
g. Because video would be taken during other, pre-existing monitoring events, there would be a costs saving from removing current travel costs of CLASS observers

Recommendation: The Administration should collect CLASS observations via video.

6. *Appeals Process*

To improve upon the transparency of the DRS, it is critical to develop a proper appeals process through which grantees can report concerns and request follow up. Comments from the Head Start community indicate that the experience and/or professionalism of reviewers varies, reporting that reviewers sometimes disrupt classrooms, watch TV on their laptops instead of observing classrooms, or cannot speak the predominant language used in the classroom. In order to ensure that not only the grantees, but also the DRS itself, is continuously improving, it is critical to add a feedback mechanism for every component, especially the CLASS condition, given its impactful use.

Recommendation: An appeals process should be established to create avenues for grantees to express concerns, reevaluate findings, and provide feedback and opportunities for improvement of the DRS.

Additional Opportunities to Improve the DRS

NHSA
NATIONAL HEAD START ASSOCIATION

In addition to the concerns around the CLASS condition, we strongly encourage the Administration to consider making two additional reforms to the DRS.

1.   Deficiency Condition

The Administration should consider changes to the single deficiency condition, specifically when a deficiency is due to a grantee self-report of a health or safety incident. As defined in the 2007 Head Start Act, the term deficiency means:

> "(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves—
> (i) a threat to the health, safety, or civil rights of children or staff;
> (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations;
> (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management;
> (iv) the misuse of funds received under this subchapter;
> (v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or
> (vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified;
> (B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or
> (C) an unresolved area of noncompliance." [6]

In many instances, the cause of a deficiency is clearly "a systemic or substantial material failure of an agency or governing body, or an unresolved area of noncompliance." [7] In these instances, we agree with the current outcome of competition. However, while we are unequivocally committed to ensuring that all children Head Start serves are safe, in instances of self-reported health and safety incidents, an automatic deficiency is not always the appropriate course of action. Assessing whether a grantee's systems are capable of preventing health and safety issues more closely aligns with the congressional intent of a deficiency in the DRS than simply considering the action or mistake of one employee, for example.

Recommendation: The Administration should create an independent review panel to consider each incident to determine if the error was due to a systemic or substantial material failure of an agency versus a situational or incidental error.

2. Timeliness of the DRS and Competition Process

---

[6] Sec. 637 (2) [42 U.S.C. 9832]
[7] Sec. 637 (2) [42 U.S.C. 9832]

N H S A
NATIONAL HEAD START ASSOCIATION

The Administration should make changes to address the timeliness of the DRS and its competition system. Per the 2007 Head Start Act, the initial implementation of the DRS transitioned all Head Start and Early Head Start grants from indefinite grants to five-year grants. Unsurprisingly, this complicated the implementation of the system and delayed the execution of grant competitions and awards. However, now that all Head Start and Early Head Start grants are on five-year grant cycles, the timeliness and predictability of when grant decisions are made, competitions announced, and awards must improve. Not knowing whether a grantee will retain its grant within a month of the grant period ending, as has been the case over the past five years, is inadequate notice to grantees and disrupts services for children, their families, and their communities.

Recommendation: We strongly recommend that the Administration create and adhere to a calendar of competition that will allow grant competition decisions to be made at least six months before the start of services for the service area.

Conclusion

Again, we commend the Administration for considering changes to the DRS, and we appreciate the opportunity to provide comments. Head Start has long been a model of effective accountability, high-quality services, and localized, targeted service delivery. The DRS was Congress and the Administration's first attempt to establish an additional layer of accountability, and it has been moderately successful. We look forward to working with Congress and the Administration on a full overhaul of the DRS in the next Head Start reauthorization. However, this initial system is in dire need of immediate improvement, and we believe that a regulatory overhaul through the changes we propose would align the DRS with Head Start's culture of continuous quality improvement–allowing children, families, and communities across the country further opportunity to achieve success. On behalf of the National Head Start Association and all the undersigned individuals and organizations, thank you for your time and your consideration.

Sincerely,

Yasmina Vinci
Executive Director

HS/EHS CLASS OBSERVATION RESULTS

AGRICULTURAL AND LABOR PROGRAM, INC.

HEAD START AND EARLY HEAD START SUMMARY BY CENTER CLASS OBSERVATIONS RESULTS

FALL 2017

The Agricultural and Labor Program, Inc.
Helping People. Changing Lives.

community Action

PARTNERSHIP

AMERICA'S POVERTY FIGHTING NETWORK

This report represents the CLASS Observations Baseline Report - Fall 2017. There were 20 Pre-K classrooms, 13 Toddlers classrooms and 1 Infant classroom randomly selected for this first round. The collected data will be a part of the school readiness analyzation process. The Team will develop strategies to implement professional development activities as well as individualize mentor/coaching support.

CENTER	EMOTIONAL SUPPORT					CLASSROOM ORGANIZATION			INSTRUCTIONAL SUPPORT		
	Positive Climate	Negative Climate		Teacher Sensitivity	Regard for Stud. Perspectives	Behavior Management	Productivity	Instructional Learning Format	Concept Development	Quality of Feedback	Language Modeling
		Raw	Reversed								
LINCOLN PARK HEAD START	6.1	7.0	1.0	5.1	5.6	5.5	5.5	5.3	3.5	2.9	3.0
FRANCINA DUVAL HEAD START	7.0	7.0	1.0	6.0	6.0	6.0	6.0	6.0	3.5	3.0	4.0
GARDEN TERRACE HEAD START	6.0	7.0	1.0	4.5	5.5	6.0	6.0	6.0	2.5	3.0	3.5
LEARNING TREE ACADEMY	4.5	5.5	2.5	4.0	4.0	4.0	6.0	3.0	2.0	2.0	2.0
CHILD DEV. AND FAMILY SERV.	5.6	6.9	1.1	5.3	5.0	5.1	5.0	4.2	3.1	3.1	3.1
GEORGE W. TRUITT FAMILY SER.	6.0	7.0	1.0	6.0	5.0	5.5	5.5	5.0	2.5	2.5	2.5
QUEEN TOWNSEND HEAD START II	5.5	6.6	1.2	4.9	5.1	5.0	5.1	4.2	3.4	3.1	3.2
Centers Score by Dimension Area	5.8	6.7	1.3	5.1	5.2	5.3	5.6	4.8	2.9	2.8	3.0

OVERALL SCORES HEAD START PRE-K CLASS OBSERVATIONS FALL 2017

PROGRAM SCORES BY DOMAIN	EMOTIONAL SUPPORT	CLASSROOM ORGANIZATION	INSTRUCTIONAL SUPPORT
	5.7078	5.2303	2.9233

CLASS OBSERVATION FALL 2017

OVERALL EARLY HEAD START TODDLERS CLASS OBSERVATIONS FALL 2017									
	EMOTIONAL AND BEHAVIORAL SUPPORT						ENGAGED SUPPORT FOR LEARNING		
CAREGIVERS	Positive Climate	Negative Climate		Teacher Sensitivity	Regard for Stud. Perspectives	Behavior Guidance	Facilitation of Learning Develop.	Quality of Feedback	Language Modeling
		Raw	Reversed						
George W. Truitt Family Services	5.88	6.50	1.25	5.38	4.50	5.63	3.00	2.88	3.25
Child Development & Family Services	7.00	7.00	1.00	5.50	6.00	6.00	4.00	2.00	3.00
Loving Care Child Development	4.50	7.00	1.00	3.50	4.50	4.00	1.50	1.50	2.50
Jumpstart Development Center	6.00	7.00	1.00	5.50	4.00	5.50	2.00	1.50	3.00
Frostproof Child Development Center	6.20	7.00	1.00	5.80	5.50	5.95	4.35	3.20	4.00
Center Score by Dimension Area	5.92	6.90	1.05	5.14	4.90	5.42	2.97	2.22	3.15
Overall Center Score by Domain	5.65						2.78		

FROSTPROOF CHILD DEVELOPMENT - 2017-2018 INFANT CLASS OBSERVATIONS FALL 2017				
	RESPONSIVE CAREGIVING			
CAREGIVERS	Relational Climate	Teacher Sensitivity	Facilitation Exploration	Early Language Support
A. Resendiz	7.00	6.00	4.75	5.25
Center Score by Dimension Area	7.00	6.00	4.75	5.25
Overall Center Score by Domain	5.75			

CLASS OBSERVATION FALL 2017

SCHOOL READINESS

(2017 Birth to Five Outcomes Baseline Report)
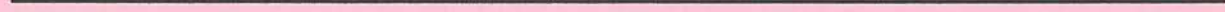
Agricultural and Labor Program, Inc.

SCHOOL READINESS FALL 2017

BIRTH TO FIVE CHILD OUTCOMES BASELINE REPORT

2017-2018

ANALYSIS OF FALL 2017 CHILD OUTCOMES DATA SUMMARY

In accordance with the Agricultural and Labor Program, Inc. Head Start/Early Head Start Program School Readiness Plan; the program has begun to collect data for the 2017-2018 school year Child Outcomes Baseline Report. The data collected has been reviewed and analyzed and used as part of the continuous improvement of the "Teaching Quality".

Data collected included: Teaching Strategies GOLD Ongoing Assessment and VPK Assessment AP 1. The data collected has been shared with parents via Home Visits, Parent/Teacher conferences, etc. As part of our continuing improvement, the Education Management Team developed strategies to work closely with Center Staff to include the Child Development Services Managers and Teaching Teams to enhance classroom interactions and promote positive outcomes and the ultimate school readiness of all children and their families.

ALPI's Education Management Team in conjunction with the center staff implemented the following improvement strategies based on the analysis and comparison of the baseline and mid-year assessment results. These strategies included the following:

- Teaching staff will continue to provide children and their families with on-going support to identify individual strengths and needs to meet their goals
- Teaching staff will help children develop problem solving skills through various questioning techniques (open-ended; i.e. how, why)
- Teaching staff will have informal conversations to promote the development of a variety of advanced vocabulary through talking with peers and adults throughout the day
- Teaching staff will encourage the children to communicate both verbally and non-verbally; words and gestures, to share information, experiences, feelings, needs, or opinions
- Teaching staff will foster positive productive relationships among children that initiate more complex forms of interactions utilizing expressive and receptive language
- Teaching staff will encourage parents/guardians to work closely with their children on the Parent Child Engagement to Promote School Readiness Activities that are sent home monthly
- Teaching staff will encourage parents to verbally communicate with their children at home through back and forth looping conversations, and reading activities
- Teaching staff will promote the use of advanced language skills prior to, during, and after reading; instill curiosity; and provide successful rich feedback loops
- Teaching staff will review GOLD online reports on a monthly basis to determine areas in need of improvement
- Teaching staff will identify areas in need of individualization and develop peer tutoring partners and mentor coaching accordingly
- Management staff will ensure that parents receive training and supplemental materials in the areas of math, literacy, science, and physical health practices to build connections in children
- Management staff will secure an Annual Refresher/Overview of CLASS Training
- Management staff will ensure that staff have access to resources such as NCQTL In-Service Suites
- Management staff will provide the Pre observation verbal and written feedback utilizing the CLASS Observation Feedback Form
- Management staff will provide CLASS Strategies Cards to post in classrooms
- Management staff will provide support to establish specific goals for improvement through continuous coaching and mentoring
- Management staff in conjunction with teaching staff will develop the CLASS Plan of Action Strategies for improvement

Teaching Strategies GOLD Background

Teaching Strategies GOLD is an authentic, observational assessment for children birth through kindergarten. The assessment system blends ongoing, authentic, observational assessment for all areas of development and learning with intentional, focused, performance-assessment tasks for selected predictors of school success in various areas. Teaching Strategies GOLD assessment system measures the knowledge, skills, and behaviors that are most predictive of school success. The tool has 38 objectives, including 2 objectives related to English Language Acquisition. The first 4 areas of child development and learning are:

- Social-Emotional
- Physical
- Language
- Cognitive

The content learning is organized into the following 5 areas:

- Literacy
- Mathematics
- Science & Technology
- Social Studies
- The Arts

The 10th area is English Language Acquisition.

When implementing the assessment system, staff follows a systematic cycle: Teaching Strategies GOLD Assessment Cycle. Each part of the cycle requires the staff to undertake a different task:

1. Observe and collect facts through observation and documentation.
2. Analyze and respond to children by considering their skills in relation to specific objectives and scaffolding their learning.
3. Evaluate by comparing a child's skills and behaviors to research-based indicators of development and learning.
4. Summarize, plan, and communicate; making use of the collected information to plan experiences and share with others.

Scaled Scores Ranges of Widely Held Expectations in the "Comparative Report"

In *Teaching Strategies GOLD* , children's knowledge, skills, and behaviors are scored for each objective or dimension. The data a teacher enters into the online tool is used to generate raw scores. For the raw scores to be compared, they need to be on a uniform scale. By generating comparative data—or scaled scores— this uniform scale enables users to compare skill levels across areas and better understand the whole child.

The "Comparative Report" uses a uniform scale that presents scores on a scale of 200–800 for each area of development and learning. Using these scaled scores enables administrators to compare a group of children's scores across areas and determine which areas need additional attention. Below are the scaled scores for each age or class/grade for the social–emotional, physical, language, cognitive, literacy, and mathematics areas:

Social–Emotional Development and Learning Scale

Age or Class/Grade	Colored Band	Range of Widely Held Expectations
Birth–1 year	Red	272–387
1–2 years	Orange	387–494
2–3 years	Yellow	458–546
Preschool 3	Green	516–614
Pre-K 4	Blue	589–690
Kindergarten	Purple	653–795

Physical Development and Learning Scale

Age or Class/Grade	Colored Band	Range of Widely Held Expectations
Birth–1 year	Red	278–389
1–2 years	Orange	399–466
2–3 years	Yellow	455–543
Preschool 3	Green	512–617
Pre-K 4	Blue	578–698
Kindergarten	Purple	646–729

Language Development and Learning and Spanish-Language Development and Learning Scale

Age or Class/Grade	Colored Band	Range of Widely Held Expectations
Birth–1 year	Red	312–410
1–2 years	Orange	410–492
2–3 years	Yellow	469–554
Preschool 3	Green	524–639
Pre-K 4	Blue	580–721
Kindergarten	Purple	675–800

Cognitive Development and Learning Scale

Age or Class/Grade	Colored Band	Range of Widely Held Expectations
Birth–1 year	Red	313–377
1–2 years	Orange	377–465
2–3 years	Yellow	453–540
Preschool 3	Green	519–634
Pre-K 4	Blue	591–738
Kindergarten	Purple	679–800

Literacy Development and Learning Scale

Age or Class/Grade	Colored Band	Range of Widely Held Expectations
Birth–1 year	Red	200–375
1–2 years	Orange	408–444
2–3 years	Yellow	470–530
Preschool 3	Green	530–610
Pre-K 4	Blue	572–705
Kindergarten	Purple	644–798

Mathematics Development and Learning Scale

Age or Class/Grade	Colored Band	Range of Widely Held Expectations
Birth–1 year	Red	200–200
1–2 years	Orange	441–491
2–3 years	Yellow	483–557
Preschool 3	Green	545–621
Pre-K 4	Blue	615–712
Kindergarten	Purple	691–800

Voluntary Prekindergarten Pre- and Post-Assessments.

Every private or public Voluntary Prekindergarten Education (VPK) Program provider must implement the pre- and post-assessments approved by the State Board of Education. The pre- and post-assessments approved by the State Board of Education is a progress monitoring tool, known as the Florida VPK Assessment. The pre- and post-assessments shall be administered by individuals, consistent with the assessment publisher's instructions, who are employed by a private VPK provider or school district and meet the following requirements: (a) Assessors must participate in professional development training designed to ensure the proper administration of the approved pre- and post-assessments and that is: 1. Available through the Office of Early Learning (OEL) by OEL personnel or OEL trained individuals; 2. Web-based training, if available; or 3. Training by means of a DVD, if available.

My TeachingStrategies™

- Agricultural and Labor Program
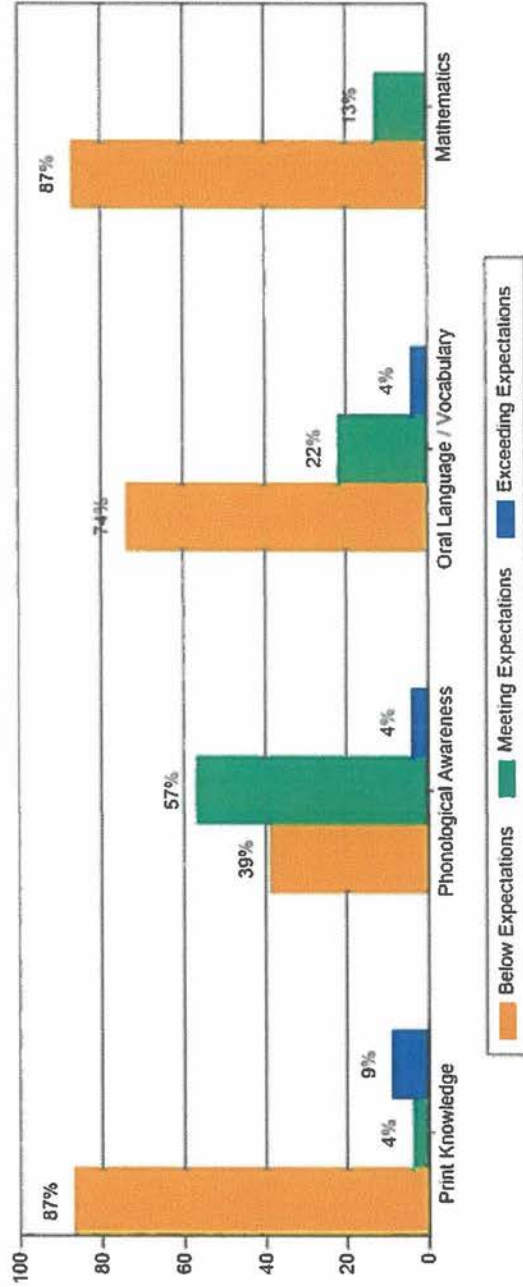### Fall 2017/2018 - Widely Held Expectations

Legend:
- Below Expectations
- Meets Expectations
- Exceeds Expectations

Chart data:

Social/Emotional
- 565 / 70.71%
- 229 / 28.66%
- 5 / 0.63%

Physical
- 563 / 70.46%
- 232 / 29.04%
- 4 / 0.5%

Language
- 582 / 72.84%
- 216 / 27.03%
- 1 / 0.13%

Cognitive
- 597 / 74.72%
- 196 / 24.53%
- 6 / 0.75%

Literacy
- 514 / 64.33%
- 272 / 34.04%
- 13 / 1.63%

Mathematics
- 556 / 69.59%
- 239 / 29.91%
- 4 / 0.5%

Spanish Language
- 0 / 0%
- 0 / 0%
- 0 / 0%

Spanish Literacy
- 0 / 0%
- 0 / 0%
- 0 / 0%

Y-axis: 0, 100, 200, 300, 400, 500, 600, 700

MyTeachingStrategies™
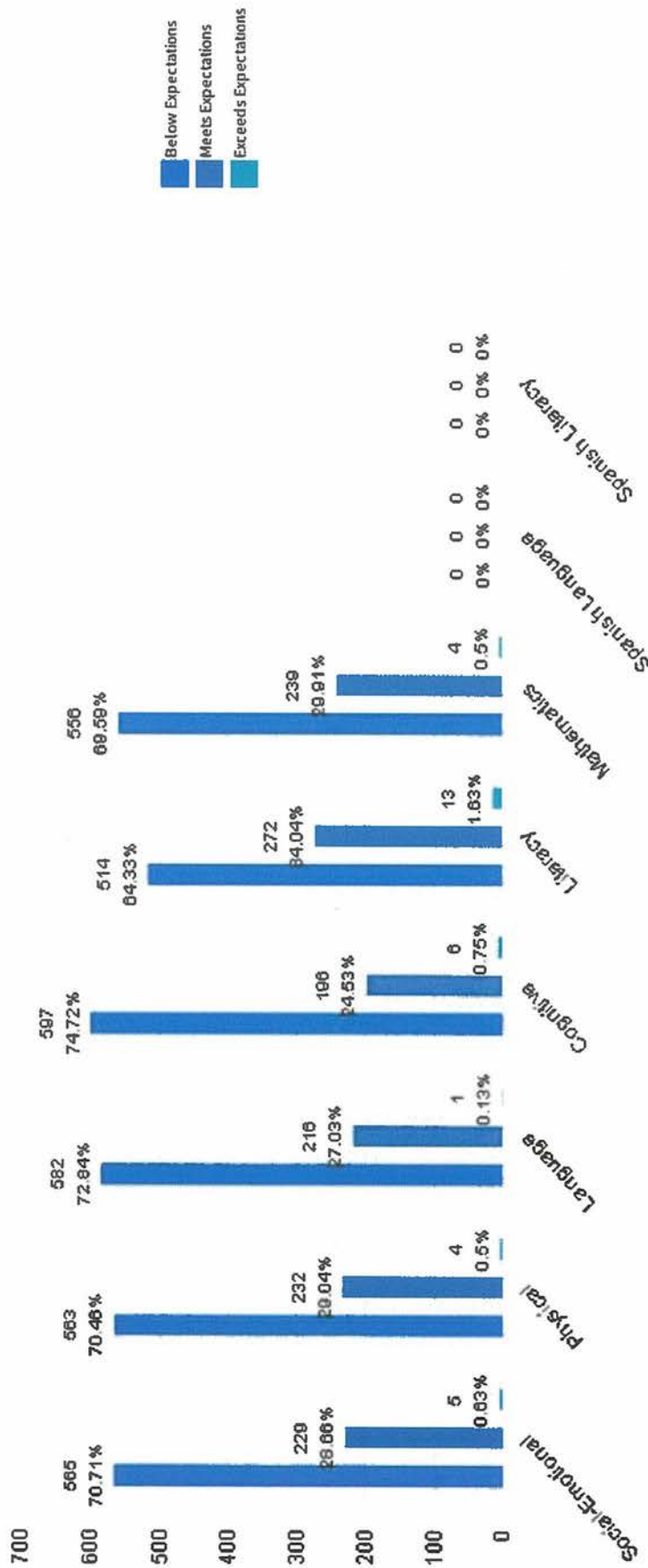
- Agricultural and Labor Program
Fall 2017/2018

	Below		Meeting		Exceeding	
Social-Emotional	565	70.71%	229	28.66%	5	0.63%
Physical	563	70.46%	232	29.04%	4	0.5%
Language	582	72.84%	216	27.03%	1	0.13%
Cognitive	597	74.72%	196	24.53%	6	0.75%
Literacy	514	64.33%	272	34.04%	13	1.63%
Mathematics	556	69.59%	239	29.91%	4	0.5%
Spanish Language	0	0%	0	0%	0	0%
Spanish Literacy	0	0%	0	0%	0	0%

273

Florida Department of Education

VPK Assessment Online Reporting System

Center Report by Assessment Measure

Assessment Period : Assessment Period - 1

VPK Center : ALPI GEORGE W TRUITT HEADSTART

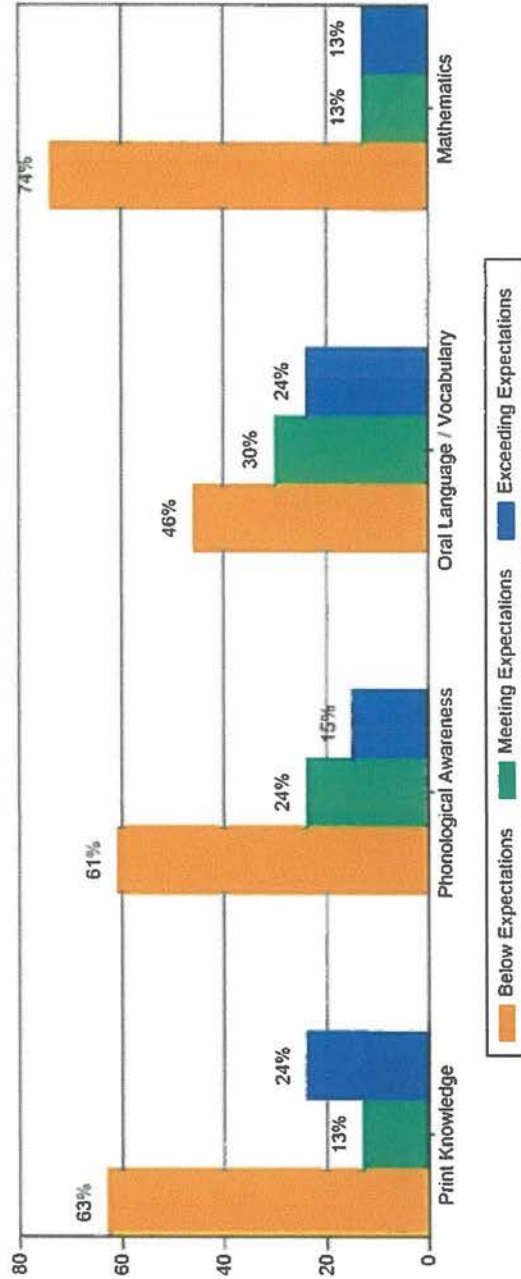Program Year and Type : 2017-18 School Year

LEGEND	
EE (Exceeding Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
ME (Meeting Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
BE (Below Expectations)	it is likely the child will NOT score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
%	Due to rounding, percentages displayed may not equal 100%

274

Florida Department of Education

VPK Assessment Online Reporting System

Center Report by Assessment Measure

Assessment Period : Assessment Period - 1   **VPK Center :** ALPI GARDEN TERRACE HEADSTART

Program Year and Type : 2017-18 School-Year

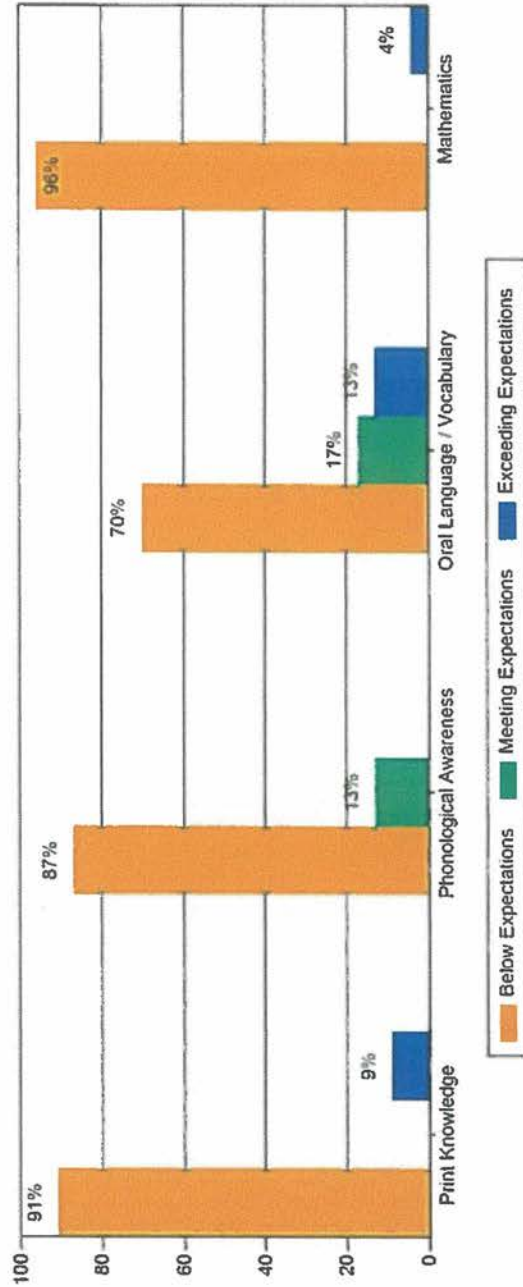Below Expectations   Meeting Expectations   Exceeding Expectations

LEGEND	
EE (Exceeding Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
ME (Meeting Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
BE (Below Expectations)	it is likely the child will NOT score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
%	Due to rounding, percentages displayed may not equal 100%

Florida Department of Education

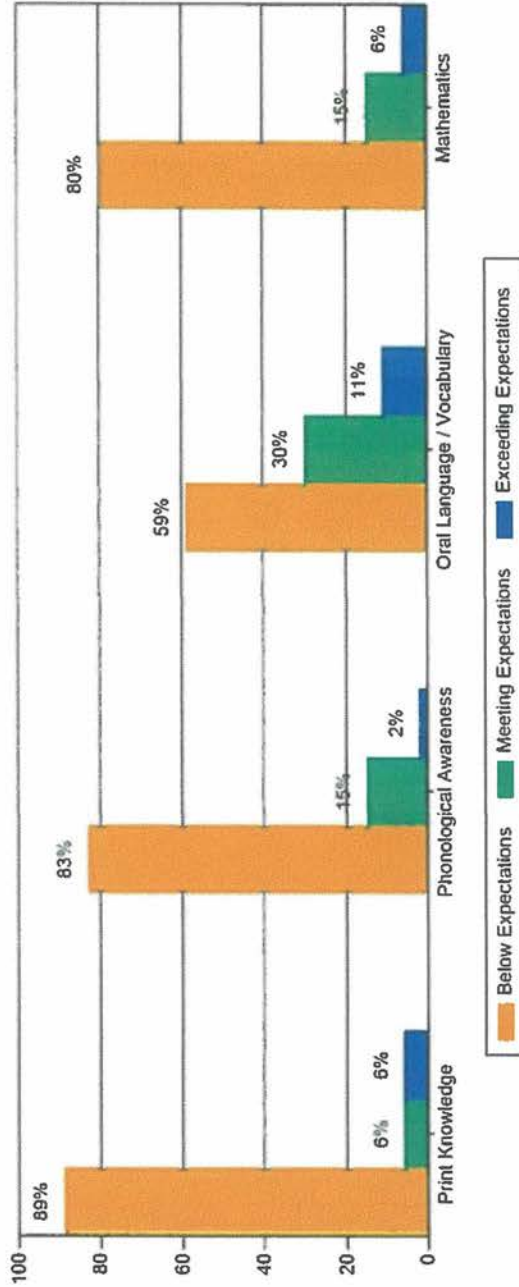VPK Assessment Online Reporting System

Center Report by Assessment Measure

Assessment Period : Assessment Period - 1   **VPK Center :** ALPI FRANCINA DUVAL HEAD START

Program Year and Type : 2017-18 School-Year

Chart (bar graph):
- Print Knowledge: 91% (Below Expectations), 9% (Exceeding Expectations)
- Phonological Awareness: 87% (Below Expectations), 13% (Meeting Expectations)
- Oral Language / Vocabulary: 70% (Below Expectations), 17% (Meeting Expectations), 13% (Exceeding Expectations)
- Mathematics: 96% (Below Expectations), 4% (Exceeding Expectations)

Legend: Below Expectations | Meeting Expectations | Exceeding Expectations

LEGEND	
EE (Exceeding Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
ME (Meeting Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
BE (Below Expectations)	it is likely the child will NOT score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
%	Due to rounding, percentages displayed may not equal 100%

Florida Department of Education

VPK Assessment Online Reporting System
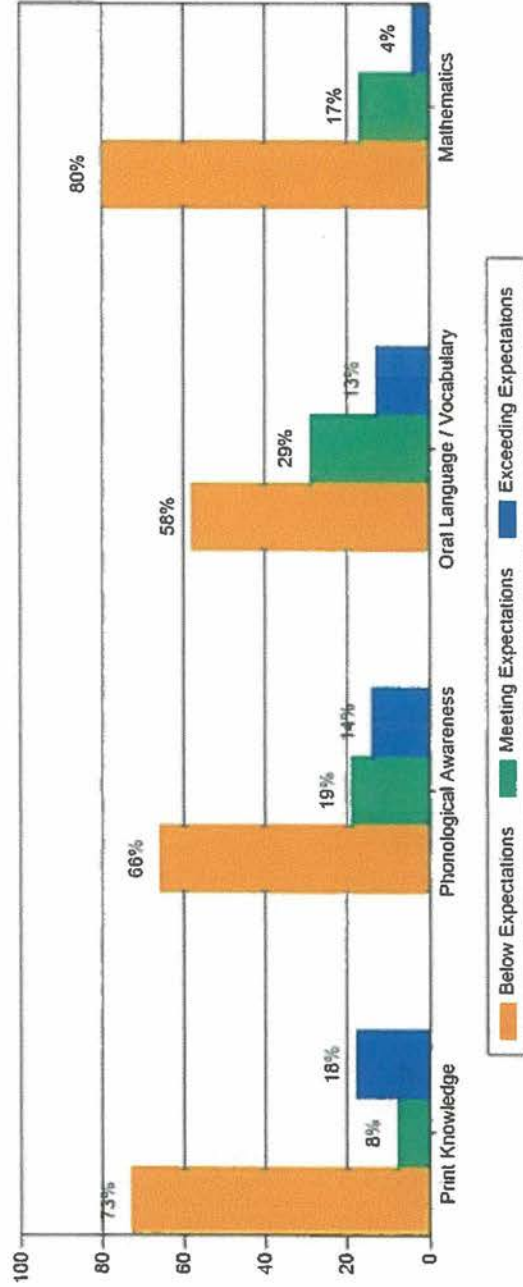
Center Report by Assessment Measure

Assessment Period : Assessment Period - 1   **VPK Center :** ALPI LINCOLN PARK HEADSTART

Program Year and Type : 2017-18 School-Year

Print Knowledge: 89%, 6%, 6%
Phonological Awareness: 83%, 15%, 2%
Oral Language / Vocabulary: 59%, 30%, 11%
Mathematics: 80%, 15%, 6%

Below Expectations   Meeting Expectations   Exceeding Expectations

LEGEND	
EE (Exceeding Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
ME (Meeting Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
BE (Below Expectations)	it is likely the child will NOT score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
%	Due to rounding, percentages displayed may not equal 100%

277

Florida Department of Education

VPK Assessment Online Reporting System

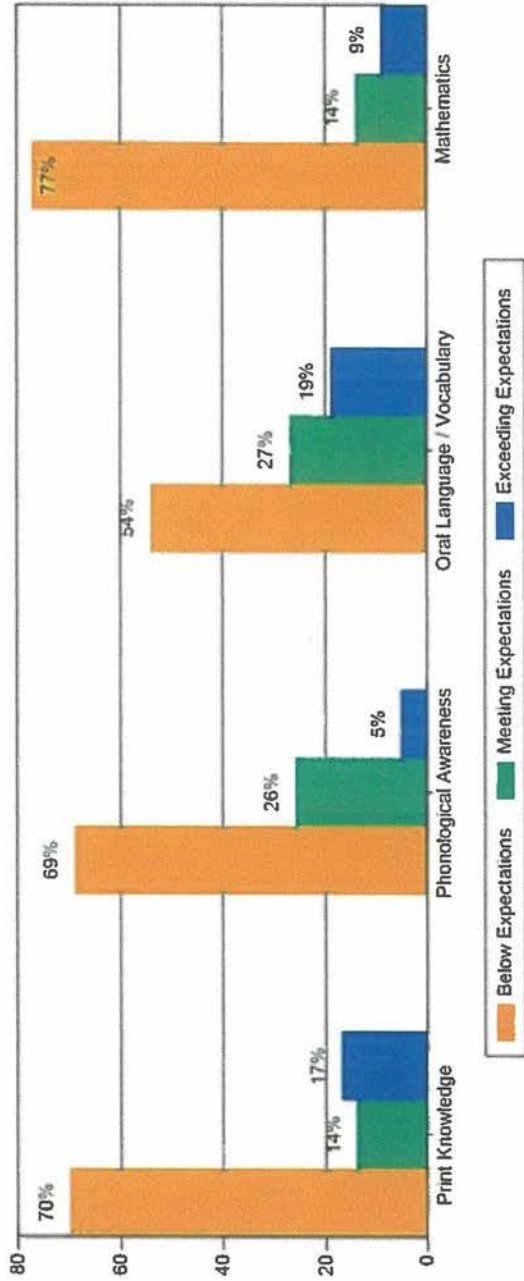**Center Report by Assessment Measure**

Assessment Period : Assessment Period - 1   VPK Center : ALPI CHILD DEV FAMILY SVCS CTR

Program Year and Type : 2017-18 School-Year

Print Knowledge: 73%, 8%, 18%
Phonological Awareness: 66%, 19%, 14%
Oral Language / Vocabulary: 58%, 29%, 13%
Mathematics: 80%, 17%, 4%

Legend: Below Expectations, Meeting Expectations, Exceeding Expectations

LEGEND	
EE (Exceeding Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
ME (Meeting Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
BE (Below Expectations)	it is likely the child will NOT score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
%	Due to rounding, percentages displayed may not equal 100%

Florida Department of Education

VPK Assessment Online Reporting System

Center Report by Assessment Measure

Assessment Period : Assessment Period - 1

VPK Center : ALPI QUEEN TOWNSEND HEAD START
CENTER II

Program Year and Type : 2017-18 School-Year

Chart legend: Below Expectations | Meeting Expectations | Exceeding Expectations

Print Knowledge: 70%, 14%, 17%
Phonological Awareness: 69%, 26%, 5%
Oral Language / Vocabulary: 54%, 27%, 19%
Mathematics: 77%, 14%, 9%

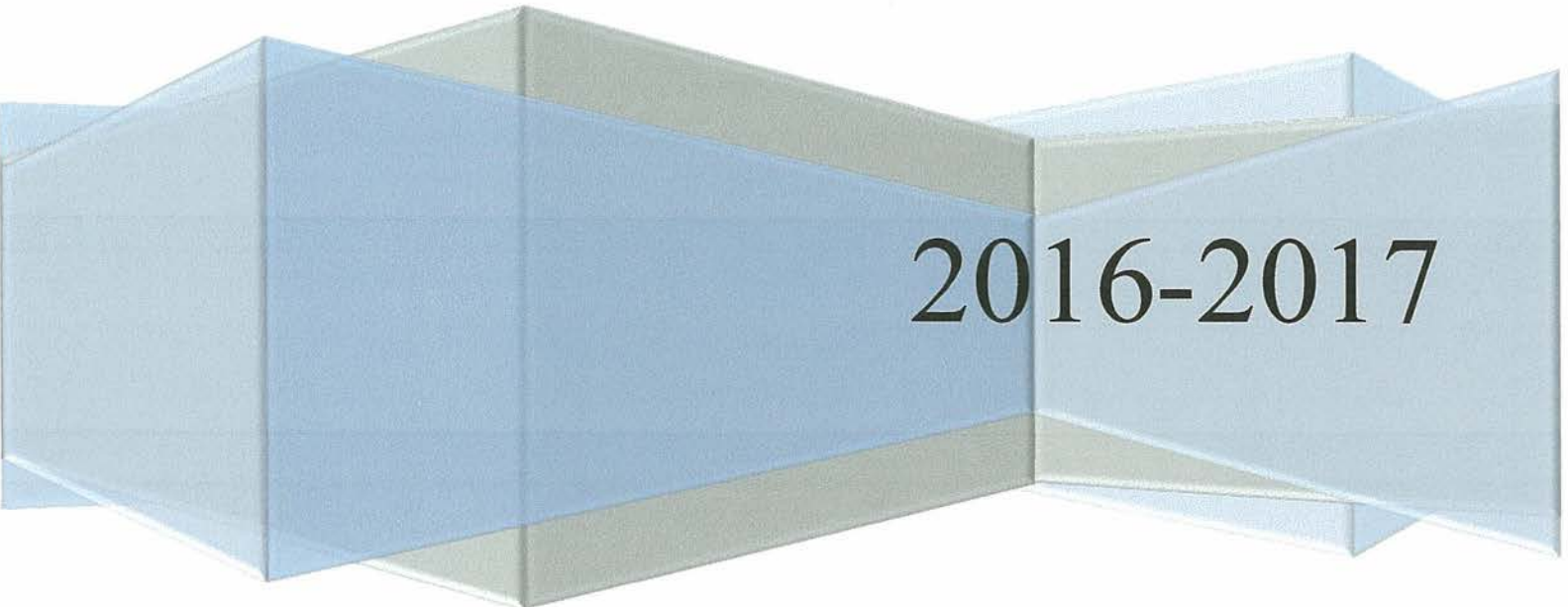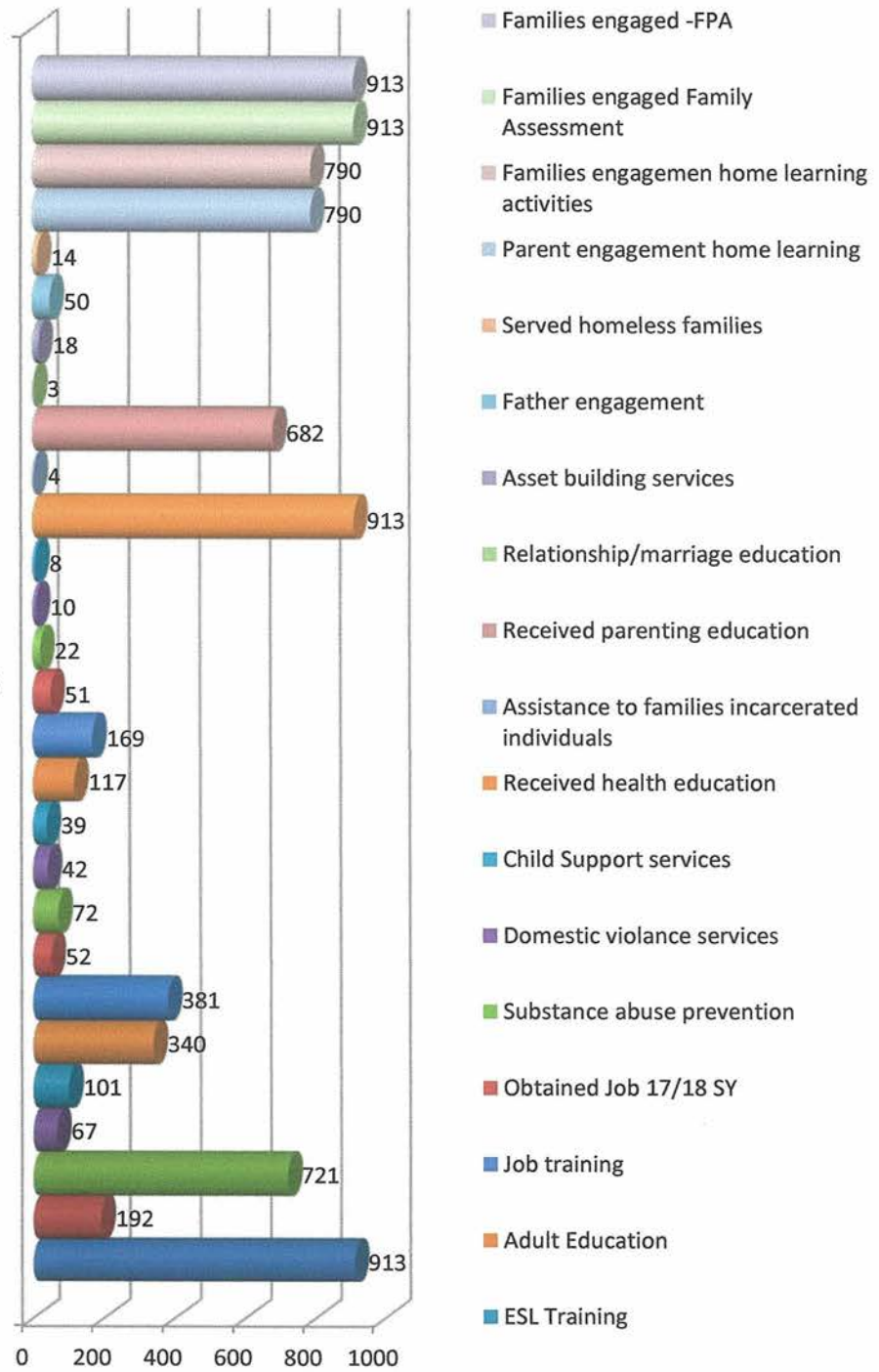| LEGEND	
EE (Exceeding Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
ME (Meeting Expectations)	it is likely the child will score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
BE (Below Expectations)	it is likely the child will NOT score "Ready" for kindergarten on the Florida Kindergarten Readiness Screener (FLKRS)
%	Due to rounding, percentages displayed may not equal 100%

FAMILY OUTCOMES REPORT

Agricultural and Labor Program, Inc.

FAMILY OUTCOMES REPORT

2016-2017

FY 16/17 FAMILY OUTCOMES

Legend:
- Families engaged -FPA
- Families engaged Family Assessment
- Families engagemen home learning activities
- Parent engagement home learning
- Served homeless families
- Father engagement
- Asset building services
- Relationship/marriage education
- Received parenting education
- Assistance to families incarcerated individuals
- Received health education
- Child Support services
- Domestic violance services
- Substance abuse prevention
- Obtained Job 17/18 SY
- Job training
- Adult Education
- ESL Training

Values (top to bottom): 913, 913, 790, 790, 14, 50, 18, 3, 682, 4, 913, 8, 10, 22, 51, 169, 117, 39, 42, 72, 52, 381, 340, 101, 67, 721, 192, 913

Axis: 0, 200, 400, 600, 800, 1000

LETTER OF INTENT TO SERVE

(SAMUEL THOMAS)

Deloris C. Johnson
Chief Executive Officer

Corporate Office
300 Lynchburg Road
Lake Alfred, Florida 33850-2576
(863) 956-3491
Toll Free: 1 (800) 330-3491
Fax: (863) 956-3357
E-Mail: admin@alpi.org
www.alpi.org

**ADMINISTRATION & OPERATIONS
QUALITY CONTROL DIVISION**
ADMINISTRATION SERVICES
Budget & Finance
Human Resources
Operations and Quality Control
IT/Computer Support & Marketing

**COMMUNITY SERVICES & ECONOMIC
DEVELOPMENT DIVISION**
CSBG Services
Service Areas: Glades, Hendry,
Highlands and Polk Counties

Farmworker Emergency Services
Service Areas: Statewide

LIHEAP Services
Service Areas: Collier, Glades, Hendry,
Highlands, Martin, Polk, and
St. Lucie Counties

Housing Counseling Services
Service Area: Polk County

Training and Employment Services
Service Area: Volusia County

ALPI Technical Education Center
Service Area: Volusia County

EHEAP Services
Service Area: Polk County

**CHILD DEVELOPMENT &
FAMILY SERVICES DIVISION**
Head Start Services
Service Area: St. Lucie County

Early Head Start Services
Service Areas: Polk and St. Lucie Counties

Child Care
Service Areas: Polk (Frostproof)
and St. Lucie Counties

Child Care Food
Service Areas: Polk (Frostproof)
and St. Lucie Counties

**Computer Assisted Tutorial
Program (CAT)**
Service Area: St. Lucie County

Eastern Region Administration Office
2202 Avenue Q
Ft. Pierce, FL 34950
(772) 466-2631
Toll Free: 1 (800) 791-3099
Fax: (772) 464-3035

January 11, 2018

Mr. Samuel Thomas
P.O. Box 518
Moore Haven, FL 33471

Dear Mr. Thomas:

This letter is to request your "intent to serve" on The Agricultural and Labor Program, Inc. Board of Directors.

Due to your absence from the last two (2) regular scheduled meetings, I am writing to request a response regarding your continued service to the ALPI Board within seven (7) days of receipt of this letter via email or US Mail.

Should you have questions and/or concerns, please feel free to give me a call at 561/538-4280 or Deloris Johnson, CEO @ 863/956-3491, Ext. 204.

Sincerely,

William Holt

William Holt
ALPI Board Chairperson

WH/ts

Deloris Johnson, CEO
ALPI Board of Directors

UPCOMING MEETINGS / CONFERENCES

REGION IV HEAD START TRAINING CONFERENCE

FEBRUARY 5 – FEBRUARY 8, 2018

ATLANTA, GA

SHARED GOVERNANCE

FEBRUARY 24, 2018

WINTER HAVEN, FL

REGION IV HEAD START ASSOCIATION

2018 Annual Training Conference
February 5-8, 2018

Sheraton Atlanta Hotel
165 Courtland Street NE
Atlanta, GA 30303
404.659.6500 | 1.800.325.3535
www.sheratonatlantahotel.com

BOARD & ADMINISTRATOR NEWSLETTER

Board & Administrator

FOR BOARD MEMBERS

Editor: Jeff Stratton

Avoid these bylaws problems

Misuse of bylaws can create problems for a board. Here are two examples:

1. **Problem area: Board size.** If the board size requirement is dropped from the bylaws because the organization is looking for new members, beware. The organization is then put in a position of holding board meetings that are in noncompliance with the bylaws.

2. **Problem area: Term limits.** The issue of term limits and boards can be a real psychological challenge for a board. Here's how: It's hard to force people who "love" the organization off the board through term limits. This is especially true when prospective board members are not lining up around the block to join. This can create a leadership vacuum for the board when the bylaws are specific about term limits and the board ignores them. ■

Develop a full understanding of your organization

The Minnesota Council of Nonprofits, in its "Board Characteristics and Qualifications" resource, said board members should be active in developing an understanding of the mission, the organization's finances and changes in the environment in which it operates.

"In addition to carrying out their fiduciary duties, and employing their unique skills, board members should orient themselves to the broad context of organizational activities," the Council said. The council recommends two ways to do this:

1. "Have an orientation for new board members so they can get familiar with organizational procedures, policies and operations."

2. "Board members can continue to develop their understanding of the organization by looking over important documents and communicating with various stakeholders throughout the organization (e.g., other board members, staff, volunteers and clients)."

For more information, go to *http://goo.gl/ 2sNp79.* ■

Building a role-savvy board

The board's chair should work with the executive director to ensure that:

• Board members realize that they have no power as individuals and can only act as a board that has reached a decision in a legally constituted board meeting.

• Board members realize that their executive director takes direction from the full board, not individual members.

• Board members realize that they are policy-makers not policy implementers and do not cross the line separating policy-making from administration. ■

How should you evaluate your executive director?

Your administrator is a professional and therefore deserves a professional evaluation. That's why it is unfair to evaluate the CEO on matters that are essentially personality traits.

Instead, evaluate the executive on progress and accomplishment of board goals. At some point during the work year, the board needs to provide the administrator with goals and objectives for the coming year and commit to evaluating performance on them. ■

Administrator evaluation procedures

The board and CEO meet for a pre-evaluation conference to discuss the goals and objectives of the evaluation.

Board members, under the direction of the board chair, complete the evaluation form independently.

The chair compiles the evaluation results, and the full board comes to consensus on the contents of the executive's evaluation.

The board, the chair or a board committee meet with the executive director to discuss the evaluation results.

At a later date, the CEO responds to the board's evaluation.

The board finalizes the evaluation.

The board makes its decision about compensation and benefits adjustments for the executive. ■

Improve committee performance with an evaluation of its work

Could your board's committees use some tweaking? Consider a committee meeting evaluation to spice things up and ensure they aren't exceeding the scope of their authority or wasting members' time. Use the following form:

Committee Meeting Evaluation

Complete this evaluation of the committee meeting you just attended. Check each item "Adequate" or "Needs Improvement."

Return the completed form to the committee chair.

Evaluation of _____ Committee Meeting Date _____

Chaired by: _____

	Adequate	Needs Improvement
Support materials were received and reviewed by all members prior to the meeting.	☐	☐
The meeting was businesslike and results-oriented.	☐	☐
We limited our discussion to agenda items only.	☐	☐
The chair guided the meeting and helped form recommendations.	☐	☐
Everyone contributed to the meeting in a positive way.	☐	☐
Our meeting room was comfortable and conducive to discussion.	☐	☐
The meeting began and concluded on time.	☐	☐
There was adequate reason for us to meet.	☐	☐
Our executive director or his or her designee attended the meeting to provide insight and serve as a resource.	☐	☐

My best suggestion for improving our next meeting is: _____ ■

Board & Administrator

FOR BOARD MEMBERS

Try these board fundraising activities

When Chuck Loring presented at the Board-Source Leadership Forum 2017, BoardSource identified these recommended board member fundraising activities:

- "Cultivate ten new friends each year.
- "Send a letter to prospects in your community.
- "Call donors to thank them for their gifts. (Donors want prompt acknowledgment of their gift, confirmation that their gifts have been set to work as intended, and measurable results showing what effect their gift has had.)
- "Drop a personal note to lapsed donors.
- "Identify prospects for cultivation events.
- "Donate to the best of your ability.
- "Identify and recruit future board members who are willing to fundraise.
- "Speak frequently about your organization and its programs and purpose.
- "Accompany staff on solicitation/cultivation visits.
- "Join your bequest society and provide a testimonial.
- "Identify potential corporate donors."

For more information, go to *http://goo.gl/4yTCNV.* ∎

Work, wisdom, wealth and clout worksheet for board members

This worksheet can help board members follow four principles (work, wisdom, wealth and clout) that will help them meet their responsibilities in the area of resource development for the organization.

Work

1. How can I better educate myself about this organization so that I can explain its mission to others?

2. In what areas can I use my skills effectively to help raise money—such as planning, working at special events, thanking donors and advocacy?

3. In what other ways could I donate my time and skills to the organization (such as professional services or marketing)?

Wisdom

1. Who do I know that could contribute money to the organization?

2. Who could donate property such as land or equipment?

3. Who has special skills that could help the organization in areas such as legal, social media, finance or influence?

Wealth

1. How much will I contribute to the organization on an annual basis?

- One annual payment of $ _____.
- Quarterly payments of $ _____.
- Monthly payments of $ _____.

Clout

1. Who do I know in state or federal governments that can be contacted about our organization's needs and issues? ∎

Grade your board's fundraising

Most boards earn average or below-average marks from their executive directors for their ability to raise money for the organization. Fully 71% of the boards earn a C grade or lower from their administrators.

The data come from *Board & Administrator's Survey on Nonprofit Executive Compensation*, conducted late in 2016.

Give your own board a grade for its fundraising performance. How does it stack up? ■

	Percentage	Board Size	CEO's Years of Experience	CEO's Years in Current Position
A	5%	17	36	26
B	19%	17	30	18
C	30%	12	28	17
D	30%	13	28	18
F	11%	14	25	14
No Response	5%	8	30	19

Prevent board/administrator conflict: Clarify who does what

Many boards struggle with this basic question about board and administrator responsibilities: who does what?

The question gets to the heart of board and administrator responsibilities. A board that understands its role and responsibilities understands that the board concentrates on the big picture (what the organization will do), and delegates implementation of how the nonprofit meets its mission to the executive director (how things get done). The board navigates, while the administrator steers the ship. ■

The following diagram is an excellent tool for clarifying responsibilities:

Clarify board and administrator responsibilities

The Board

Answers these questions first:

- The organization's vision
- The organization's mission

Responsible for:

- Goals for the nonprofit
- Policies
- Concentrates on end results
- (always the board's primary focus)

Asks:

- What?
- Why?
- How much?

Votes/approves

The Executive Director

Acts based on the board's answers to questions/decisions

Responsible for:

- Objectives
- Action plans
- Regulations
- Procedures

Determines:

- How?
- When?
- Where?
- Who?

Recommends to board

Supplement

Board & Administrator
FOR BOARD MEMBERS

Editor: Jeff Stratton

The board needs motivation and inspiration

Keeping board members connected to the mission presents challenges. Here are several ways to accomplish this at board meetings. If one sounds promising, speak to your executive director about including it on the board meeting agenda.

• **Build a "mission moment" into the board meeting.** The staff can tell the story of a person your organization serves who has had success.

Or try starting a "speakers' bureau" comprising people you serve who can tell their stories in a presentation to the board.

• **Engage the board in fundraising.** Schedule one-to-one meetings with your CEO and board chair, who can lay out the organization's fundraising plan and ask board members to participate in whatever way they can.

• **Boost committee engagement with specific work.** Committees typically perform more hands-on work that can fit perfectly with a board member's area of expertise. ■

Board secretary should have increased workload

Michael Daigneault believes the role of the board secretary—the person who typically takes meeting minutes and records governing documents—should be expanded to include more work. The type of work should be in the form of increased responsibilities that will serve to improve the board's overall performance.

Daigneault recommends viewing your secretary as the board's "chief governance officer."

His strategy is to make the secretary chair of a board governance committee and to give the secretary responsibilities in the area of new member recruitment, working in partnership with the board chair and executive director.

The secretary should also manage governance activities such as appraisals of the board and committees the board uses.

By giving the secretary this type of governance work, the board will develop a governance advocate who works to improve its performance.

For more information, go to *http://quantumgovernance.net*. ■

Place a dollar value on the board's time

People who volunteer to serve on boards deserve a round of applause. They also deserve to have their time used wisely and efficiently.

One way to respect board time is to put a dollar value on it. Place a dollar value on the hourly rate each board member gives to the organization. Multiply this figure by the number of board members at your organization.

You will likely come up with an impressive figure that should drive home the point of working effectively and efficiently as a board to make the best use of the board's valuable time. ■

Process builds a self-correcting board

The concept of a "self-correcting" board is simple yet powerful. On a self-correcting board, the board's leadership and veterans nip undesirable board behavior (such as role confusion) in the bud before it gets out of control.

To develop a self-correcting board, begin at orientation of new members. Often, new members lack board experience, and specifically they lack experience in how your board operates.

During orientation, new board members should be provided with a flowchart of the organization, information about the budget, information about fellow board members, the organization's bylaws and quick and easy-to-read literature about how to serve on a board.

New members should sit down with your administrator to review nuts-and-bolts information about the organization (such as size of the organization and staff, budget and staff responsibilities).

Once board members have been through orientation and understand concepts such as who does what, it is easier for the board to have discussions in this area.

Board & Administrator can also be a valuable resource on roles and responsibilities because it regularly discusses board/staff contact and roles.

The concept of a self-correcting board can eventually become cultural in that the officers and chair are the mentors to new board members. There should be a progression to leadership positions of board members who "get it" about roles.

For example, if a board member has served on the executive committee and hears of some back-channel communication with staff taking place, he or she can point out that the board member involved should talk to the chair about that.

A board should be up front about those types of conversations. Board problems are the board's to correct. ■

Boards need a meeting attendance policy

Inactive board members are a board team problem. For one thing, inactives don't shoulder their fair share of the workload, resulting in more work for others.

That's a strong reason for the board to establish and enforce a meeting attendance policy. All new, current and prospective board members should understand the policy.

As a second step in improving meeting attendance, the board chair should counsel those with spotty attendance and encourage them to be more active in their board service.

If these steps don't help fix the problem, the board chair should suggest those nonattending members resign from the board or work to find another way to engage them. ■

Don't let bylaws get 'dusty'

In "The 15 Most Common Nonprofit Bylaw Pitfalls: How to Avoid the Traps," Venable LLP suggests keeping a pulse on the bylaws once they've been amended.

"After engaging in a bylaw amendment process, make sure that your bylaws do not become dusty," Venable writes. "Some nonprofits maintain a standing bylaws committee composed of board members that can speak up at meetings when issues implicating the bylaws are discussed. Other organizations place the bylaws as an agenda item at each annual meeting of the board of directors, to prompt consideration."

For more information, go to *http://goo.gl/ KWZjEe.* ■