

Department of Health & Human Services

**OFFICE OF
INSPECTOR GENERAL**

**MOST EARLY HEAD START
TEACHERS HAVE THE REQUIRED
CREDENTIALS, BUT
CHALLENGES EXIST**



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Inspector General**

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OBJECTIVES

1. To determine the extent to which Early Head Start teachers had the required credentials.
2. To determine the extent to which Early Head Start programs employed only teachers with the required credentials.
3. To describe the activities and challenges of Early Head Start programs in employing credentialed and trained teachers.

BACKGROUND

In 2007, Congress reauthorized the Head Start Act and created the first law governing the credentialing and training of center-based Early Head Start teachers. The Head Start Act requires that all center-based Early Head Start teachers have a minimum of a child development associate (CDA) credential and have been trained (or have completed equivalent coursework) in early childhood development by September 30, 2010. It also requires that all Early Head Start teachers have training (or have completed equivalent coursework) in early childhood development with a focus on infant and toddler development by September 30, 2012.

Federal funding of Early Head Start dramatically increased in 2009. The American Recovery and Reinvestment Act of 2009 (Recovery Act) gave the Administration for Children & Families (ACF) an additional \$1.1 billion to expand Early Head Start services. ACF allocated the Recovery Act funds to both new and established grantees, resulting in an increase from 714 grantees in the 2008–2009 program year to 992 grantees in the 2009–2010 program year.

For this study, we reviewed credentials from a sample of 221 Early Head Start programs operating in the 2010–2011 program year. In addition, we surveyed the same sample of programs about the challenges to meeting the education and training requirements for teachers.

FINDINGS

Overall, 81 percent of Early Head Start teachers had the required credentials. Although 19 percent of teachers did not have the required credentials, more than half of these teachers were pursuing them. Teachers from preexisting programs were more likely to have the

required credentials than teachers from new programs developed using Recovery Act funds.

Approximately one-third of Early Head Start programs employed only teachers with the required credentials. Thirty-five percent of programs employed only teachers with the required credentials, whereas 65 percent of programs employed at least one teacher without the required credentials. Overall, more than half of the teachers employed by 89 percent of programs had the required credentials. In 3 percent of programs, 25 percent of teachers or fewer had the required credentials.

Nearly all Early Head Start programs reported requiring teachers to complete training. Ninety-six percent of programs reported requiring teachers to complete ongoing training. Programs identified training topics in the areas of infant and toddler development, safety, and communication methods.

Early Head Start programs reported challenges to employing only teachers with the required credentials and to training teachers.

Most programs reported challenges to either employing only teachers with the required credentials or to training teachers.

Eighty-three percent reported challenges to employing only teachers with the required credentials because they could not find teachers with credentials. In addition, programs most commonly reported finding substitutes and managing work schedules as challenges to training teachers. In rural areas, other challenges to training teachers appeared to be more prevalent.

RECOMMENDATIONS

Work with Early Head Start programs to ensure that all teachers have the required credentials. ACF should ensure that all Early Head Start programs employ only teachers with the required credentials.

ACF could:

- provide additional support to programs that were newly developed using Recovery Act funds,
- identify and share strategies used by programs that employed only teachers with the required credentials, or
- work with programs that employ teachers without the required credentials to develop and implement an action plan.

Provide guidance to programs about training teachers.

**AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL
RESPONSE**

ACF concurred with our recommendations. ACF stated that it plans to issue an information memorandum to provide additional guidance for programs on teacher credentials and qualifications. In addition, ACF stated that it could provide guidance about teacher training, but that it could not require a certain number of training hours without a regulatory change. We encourage ACF to issue both the planned information memorandum and guidance about teacher training. We did not make any changes to the report based on ACF's comments. For the full text of ACF's comments, see Appendix B.



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BACKGROUND

In 2007, Congress reauthorized the Head Start Act and created the first law governing the credentialing and training of center-based Early Head Start teachers.¹ The Head Start Act requires that all teachers working for center-based Early Head Start grantees have a minimum of a child development associate (CDA) credential and have been trained (or have completed equivalent coursework) in early childhood development by September 30, 2010.² It also requires that all Early Head Start teachers have training (or have completed equivalent coursework) in early childhood development with a focus on infant and toddler development by September 30, 2012.³ Hereinafter, the part of the law referring to teacher credentials will be called the “education requirement” and the parts of the law referring to teacher training will be called the “training requirement.”

Overview of the Early Head Start Program

Established in 1994, Early Head Start provides comprehensive services to low-income pregnant mothers and infants and toddlers from birth to age 3. Early Head Start’s mission is to promote healthy prenatal outcomes, enhance the development of infants and toddlers, and promote healthy family functioning. In the 2009–2010 program year, the Administration for Children & Families (ACF) served more than

¹ Improving Head Start for School Readiness Act of 2007, P.L. 110-134 (Head Start Act) § 645A(h), 42 U.S.C. § 9840a.

² Ibid.

³ Ibid.

100,000 infants and toddlers through almost 1,000 Early Head Start grantees.^{4, 5}

Early Head Start grantees may include local public agencies, private nonprofit and for-profit organizations, Native American tribes, and school systems. Many Early Head Start grantees subcontract to delegate agencies. Grantees have a formal contractual relationship with delegate agencies and allow delegate agencies to independently manage Early Head Start centers. However, grantees are ultimately responsible for overseeing and managing the Early Head Start centers, including ensuring the credentialing and training of teachers.

Early Head Start grantees and delegate agencies may deliver: (1) center-based services, (2) home-based services, (3) both center- and home-based services, or (4) alternative services. In center-based services, teachers work with children in a traditional classroom setting. In home-based services, staff members support children and families in their homes by meeting language development, health, and developmental needs. Alternative services may include a local option that tests new approaches to delivering Early Head Start services or a family childcare option.

In the 2009–2010 program year, approximately 54 percent of Early Head Start grantees delivered both center- and home-based services, approximately 23 percent delivered solely center-based services, and approximately 16 percent delivered solely home-based services.⁶ The remaining 7 percent of grantees delivered alternative services.⁷

Federal funding of Early Head Start dramatically increased in 2009. The American Recovery and Reinvestment Act of 2009 (Recovery Act) gave ACF an additional \$1.1 billion to expand Early Head Start services.⁸ This money was distributed through the end of fiscal year (FY) 2010. In comparison, Early Head Start’s original FY 2009 budget was \$710 million.⁹

⁴ Office of Inspector General (OIG) analysis of 2010 ACF administrative data.

⁵ The program year is the 12-month period in which Early Head Start provides services. Program years can start at any time from August 1 through September 15.

⁶ OIG analysis of 2010 ACF administrative data.

⁷ Ibid.

⁸ Recovery Act, P.L. 111-5, (Feb. 17, 2009), Title VII.

⁹ Department of Health & Human Services (HHS), *Fiscal Year 2010 Budget in Brief*, May 7, 2009. Accessed at <http://www.dhhs.gov> on February 10, 2011.

ACF allocated the Recovery Act funds to both established and new Early Head Start grantees, resulting in an increase from 714 grantees and delegate agencies in the 2008–2009 program year to 992 grantees and delegate agencies in the 2009–2010 program year.¹⁰ Using these funds, Early Head Start grantees and delegate agencies served approximately 48,000 new children.¹¹ Overall, the Recovery Act allowed Head Start and Early Head Start grantees and delegate agencies to hire an estimated 7,000 new teachers.¹²

Hereinafter, Early Head Start grantees and delegate agencies that existed prior to the Recovery Act are referred to as “preexisting.” Early Head Start grantees and delegate agencies created through Recovery Act funds are referred to as “new.”

Early Head Start Teacher Qualification Requirements

Education requirement. ACF promulgated regulations exclusive to Early Head Start teachers in 1996. The regulations state that any teacher working with infants and toddlers must obtain a CDA specializing in infants and toddlers within 1 year of hire.¹³

These regulations were superseded by the Head Start reauthorization. The reauthorization had language that was specific to Early Head Start teachers and removed the 1-year grace period. While the reauthorization is clear that teachers must receive a CDA, it removed the specialization of an infant and toddler CDA.¹⁴ After the reauthorization, Early Head Start programs had to either ensure that teachers currently employed had or would receive credentials by the 2010 deadline or hire new teachers who already had credentials.

Teachers pursuing a CDA must meet specific requirements. The Council for Professional Recognition (the Council) administers the CDA national credentialing program. Teachers are eligible for a CDA from the Council if they have a high school diploma or equivalent, 480 hours of childcare experience, and 120 hours of childcare education.

¹⁰ OIG analysis of 2009 and 2010 ACF administrative data.

¹¹ HHS, FY 2012, ACF, *Justification of Estimates for Appropriations Committees*. Accessed at <http://www.acf.hhs.gov> on May 4, 2011.

¹² Ibid.

¹³ 45 CFR § 1304.52(f).

¹⁴ The Head Start reauthorization also addressed training requirements for Early Head Start home-based staff and education requirements for Head Start teachers, teaching assistants, and education coordinators.

Applicants must submit proof of their childcare experience and recommendations from students' parents to the Council. After reviewing applications, Council staff interview applicants and administer a written test before awarding the CDA.¹⁵

ACF recognizes other credentials as having met the education requirement if they are equivalent to or more advanced than a CDA. For example, some States or universities may award diplomas or certificates in early childhood education. ACF refers to these diplomas and certificates as "alternative credentials" and recognizes them if they are approved by an expert panel within ACF.¹⁶ In addition, ACF considers associate's, bachelor's, or advanced degrees in early childhood education (or a related field with equivalent coursework) as credentials that equal or exceed a CDA.¹⁷ Hereinafter, any credential that meets or exceeds a CDA will be referred to as a "required credential."

Training requirements. ACF has not provided guidance on the requirement that all teachers have training in early childhood education by September 2010 or the requirement that all teachers have training in infant and toddler development by September 2012. In the 1996 regulations, ACF offered general guidance on training for Early Head Start teachers.¹⁸ The regulations state that Early Head Start teachers must be trained in subject areas such as infant and toddler development, safety issues, and communication methods.¹⁹ However, ACF has not provided guidance regarding the number of hours or frequency of training.

ACF Support for Teacher Qualifications

ACF provides funds to help improve teacher qualifications. ACF provides a training budget and additional quality improvement funds to grantees when available. Grantees may use this money to fund the credentialing or training of Early Head Start teachers. The Recovery Act made nearly \$354 million available in quality improvement

¹⁵ Council for Professional Recognition, CDA Credential, CDA Assessment System. Accessed at <http://www.cdacouncil.org> on June 22, 2010.

¹⁶ ACF, *Review and Approval of Child Development Associate (CDA) Equivalent/Alternative Training Programs by State*, December 20, 2006. Accessed at <http://www.acf.hhs.gov> on February 25, 2011.

¹⁷ ACF, *Policy Clarifications-J-Staffing and Program Options-OHS-PC-J-033*, April 29, 2008. Accessed at <http://www.acf.hhs.gov> on February 10, 2011.

¹⁸ 45 CFR § 1304.52(f).

¹⁹ Ibid.

funding.²⁰ In addition, ACF funds Higher Education Partnership grants for colleges and universities. These grants help develop early education programs in colleges and universities and provide educational opportunities for Early Head Start teachers working toward credentials. Finally, Early Head Start teachers can apply for a student loan forgiveness program.

ACF Oversight of Teacher Qualifications

ACF monitors Early Head Start teacher qualifications through the Program Information Report (PIR), onsite monitoring, and the risk management process.

The PIR. Annually, grantees report to ACF the highest degree or credential of each teacher, as well as other program information.²¹ In addition, grantees report the number of staff enrolled in the degree or credential program above what they currently hold (e.g., of teachers that have a CDA, the number enrolled in an associate's or bachelor's degree program). However, ACF does not require grantees to report training that teachers received outside a credential or degree program.

Onsite monitoring. The Head Start Act established monitoring requirements for all Head Start agencies, including Early Head Start.²² The Head Start Act states that all grantees should receive a full review at least once every 3 years and that new grantees should be reviewed after their first year.

As part of the onsite monitoring visit, ACF reviews credential and training documents. If a grantee has teachers without credentials during the 2010–2011 monitoring cycle, ACF will indicate a concern in the report and will review those grantees again at a later date.²³

Risk management process. ACF conducts the risk management process annually with each grantee.²⁴ ACF staff and grantees use this process

²⁰ ACF, *Head Start Funding Increase*, ACF-PI-HS-09-06, May 12, 2009. Accessed at <http://www.acf.hhs.gov> on May 4, 2011.

²¹ ACF, *Early Childhood Learning and Knowledge Center, Program Information Report (PIR)*. Accessed at <http://eclkc.ohs.acf.hhs.gov> on March 31, 2010.

²² Head Start Act § 641A(c)(1)(A) and (B); 42 U.S.C. § 9836a(c)(1)(A) and (B).

²³ ACF, *Qualifications for Early Head Start Infant and Toddler Center-Based Staff*, ACF-IM-HS-10-06, October 27, 2010. Accessed at <http://www.acf.hhs.gov> on February 10, 2011.

²⁴ ACF, *Head Start Risk Management Process*, ACF-IM-HS-08-06, February 5, 2008. Accessed at <http://www.acf.hhs.gov> on February 15, 2011.

to identify grantees' areas of strengths and needs for improvement. ACF staff also work with grantees to develop an action plan for identified areas of weakness, including the education requirement.

Related Reports

In a 2010 report responding to Recovery Act mandates, the Government Accountability Office (GAO) found that the percentage of Early Head Start teachers with credentials decreased between 2009 and 2010.²⁵ In addition, GAO reported that grantees cited finding and developing staff as a significant challenge.²⁶

Both OIG and GAO have completed work related to qualifications of Head Start teachers. A 2004 OIG report found that Head Start teacher qualifications had increased over the years, but that disparities among grantees existed in the percentage of degreed teachers.²⁷ In a 2003 report, GAO found that Head Start appeared to meet a 1998 mandate that 50 percent of Head Start teachers nationwide have a minimum of an associate degree in early childhood education or a related field by September 30, 2003.²⁸ However, GAO found that the PIR data did not capture whether a teacher with the required credentials was in each classroom.²⁹ These reports did not focus on Early Head Start teachers.

METHODOLOGY

Through a review of teacher credentials from a sample of randomly selected Early Head Start grantees and their delegate agencies (hereinafter referred to as programs), this study determined the extent to which: (1) teachers had the required credentials and (2) programs employed only teachers with the required credentials. In addition, we conducted a survey of the same programs to describe the activities and

²⁵ GAO, Recovery Act: Head Start Grantees Expand Services, but More Consistent Communication Could Improve Accountability and Decisions About Spending, GAO-11-166, December 2010.

²⁶ Ibid.

²⁷ OIG, Status of Efforts to Increase the Qualifications of Head Start Teachers, OEI-07-01-00560, January 2004.

²⁸ GAO, Head Start: Increased Percentage of Teachers Nationwide Have Required Degrees, but Better Information on Classroom Teachers' Qualifications Needed, GAO-04-05, October 2003.

²⁹ Ibid.

challenges of Early Head Start programs trying to meet the education and training requirements.

Scope

This study focused only on Early Head Start center-based programs within the 50 States and the District of Columbia operating in the 2010–2011 program year. It excluded Early Head Start programs from U.S. territories. It also excluded Head Start programs, as Head Start teachers have separate education requirements.

In addition, this study focused on whether Early Head Start center-based teachers had credentials. It did not focus on the credentials of other Early Head Start staff, including home-based staff, as the education requirements do not apply to them.

Finally, because of limited ACF guidance about the training requirement, this study did not determine whether grantees complied with the 2010 training requirement in early childhood development. However, we surveyed programs to identify activities and challenges in meeting the training requirement.

Sample Selection

Program sampling frame. We developed a sampling frame of programs that offered center-based Early Head Start services and were operating in the 2010–2011 program year. ACF provided a list of 763 programs that matched these criteria. We removed 20 programs from the sampling frame because of their location in territories, 1 program because it did not match the ZIP Code approximation file we used for stratifying samples, and 5 programs that pretested our instruments in the early stages of the study. Our final sampling frame consisted of 737 programs offering Early Head Start center-based services.

Sample selection. After creating the sampling frame of 737 programs, we selected a stratified random sample of 223 programs. We stratified by rural and urban status and by number of teachers per program. We stratified by rural and urban status because anecdotal evidence suggested that urban programs might be more likely to meet the education requirement than rural programs. We stratified by number of teachers to improve the precision of our estimates.

To stratify by rural and urban status, we used the 2004 Rural Urban Commuting Area (RUCA) codes.³⁰ We matched the ZIP Code of each Early Head Start program to 1 of 10 primary codes using RUCA's ZIP Code approximation file. We considered programs to be rural if they were located in an area with a population less than or equal to 49,999 (RUCA primary codes 4–10). We considered programs to be urban if they were located in an area with a population greater than 49,999 (RUCA primary codes 1–3). This is considered the standard split for rural and urban areas according to the RUCA definitions. Thirty-three percent of programs in the sampling frame were rural and 67 percent were urban.

To stratify by number of teachers, we obtained data about funded enrollment for the 2010–2011 program year from ACF. Then, to estimate the number of teachers, we assumed a 1:4 teacher-student ratio in classrooms, based on program requirements.³¹ Table 1 shows the population of programs within the sampling frame, the four strata, and the final number of programs selected in each stratum.

³⁰ RUCA codes classify U.S. Census tracts by population density, urbanization, and daily commuting. The ZIP Code approximation file was developed for use with health care data sets. The 2004 version is the most recent version available. Rural Health Research Center, *About Us: RUCA Origins*. Accessed at <https://depts.washington.edu/uwruca/ruca-about.php> on February 22, 2011.

³¹ 45 CFR 1304.52(g)(4) describes the Early Head Start teacher-student ratio. In summary, it states that programs must ensure that each teacher has responsibility for no more than four infants and toddlers.

Table 1: Sample Stratification

Stratum Number	Stratum Description	Program Population	Number of Programs Selected
1	Urban programs with estimated number of teachers < 150	481	110
2	Urban programs with estimated number of teachers • 150	14	14
3	Rural programs with estimated number of teachers < 70	238	95
4	Rural programs with estimated number of teachers • 70	4	4
Total		737	223

Source: OIG sample stratification, 2010.

Although we did not stratify based on whether a program received Recovery Act funds, we collected these data from ACF. Seventy-seven percent of the programs in the sampling frame were preexisting programs and the remaining 23 percent were new programs.

Data Collection

We emailed the request for teacher credentials and the survey regarding training to the 223 sampled programs in October 2010. We made at least two followup attempts by telephone and one by signature-required certified mail. Data collection lasted through November 2010. During data collection, we learned that one program no longer offered center-based services and another was not yet in operation. Our final sample consisted of 221 programs.

To ensure a timely and accurate analysis, we requested teacher credentials directly from programs rather than relying on PIR. PIR data for the 2010–2011 program year will not be available until late 2011 or early 2012. In addition, previous OIG reports cited concerns about PIR data.^{32, 33}

Teacher credentials. From each program, we requested a master list of all Early Head Start teachers and one document supporting one of the following for each teacher: (1) highest level of completed education; or (2) proof of enrollment in a CDA, certificate, or degree program.

³² OIG, *Enrollment Levels in Head Start*, OEI-05-06-00250, April 2007.

³³ OIG, *Status of Efforts to Increase the Qualifications of Head Start Teachers*.

Documents to support the highest level of completed education could include: diploma, transcript indicating degree received, CDA, or alternative credential. Documents to support a teacher's pursuit of a degree or certificate could include: transcript, CDA application, or receipt of paid tuition. Of the 221 programs, 209 responded to the request for teacher credentials, for a program response rate of 95 percent.

We estimate that the teacher response rate was 98 percent. The 209 programs that responded indicated that they collectively employed 3,799 teachers. Using 2010 PIR data, we estimated that, collectively, 75 teachers were employed at the 12 programs that did not respond to our request, for a total of 3,874 teachers.

Survey. We also requested that each program complete a survey regarding the activities and challenges to ensuring the credentialing and training of teachers. Of the 221 programs, 215, or 97 percent, responded.

Data Analysis

Teacher credentials. To determine the extent to which Early Head Start teachers had the required credentials and programs employed only teachers with required credentials, we reviewed teacher credential documents.

We determined the types of credentials that teachers had. Our analysis included all 3,799 teachers working for the 209 programs that responded to the request. We considered a teacher to have a credential if the teacher had a CDA, a college degree, or any alternative credential. We considered a teacher as not having a credential if the program did not submit documentation for an individual teacher or if the teacher had only a high school equivalency. We calculated the overall percentage of teachers that had credentials.

When teachers did not have credentials, we determined whether they were pursuing them. We considered teachers to be pursuing credentials if the documents provided indicated that they had applied for a CDA or were enrolled in a certificate or degree program in 2010.

We considered a program to have met the requirement if all of its teachers had credentials. Our analysis of programs included the 209 programs that responded to our documentation request. We calculated the percentage of programs that employed only teachers with required credentials and the percentage that did not. For programs

that did not employ only teachers with required credentials, we determined the percentage of teachers within those programs that had required credentials.

Survey. To analyze programs' responses, we tallied responses to identify what programs were doing to meet the education and training requirements and any challenges that programs faced. We also reviewed programs' open-ended responses to identify approaches to training. We used the results of this analysis to describe the activities and challenges of Early Head Start programs trying to meet the education and training requirements.

Statistical tests and projections. For both teacher credentials and the training survey, we determined whether there were any differences by rural and urban status and by new and preexisting status. We used appropriate tests to determine whether any differences were statistically significant. We determined statistical significance based on a 95-percent confidence level.

In addition, we projected all results to all 737 Early Head Start center-based programs operating in the 2010–2011 program year and all teachers within those programs. See Appendix A for a list of 95-percent confidence intervals for all statistical projections.

Data Limitations

We did not determine whether alternative credentials met or exceeded the CDA requirement. Although ACF publishes a list of credentials that meet or exceed the CDA requirement, ACF staff acknowledge that this list is not up to date. Therefore, we accepted all alternative credentials.

In addition, we did not determine whether the subject area of a college degree was related to early childhood education. ACF has not defined what subject areas are related to early childhood education. To be as inclusive as possible, we accepted all degrees as meeting and exceeding a CDA, regardless of the subject areas.

Finally, we based our analysis of teacher credentials on documents submitted by the program. Some teachers may not have provided their credentials to their program. During onsite monitoring visits, ACF reviews only credentials that programs keep on file. We assumed that programs sent us all the teachers' credentials that were on file.

I N T R O D U C T I O N

Standards

This study was conducted in accordance with the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.

FINDINGS

Overall, 81 percent of Early Head Start teachers had the required credentials

Eighty-one percent of Early Head Start teachers had credentials that were equivalent to or exceeded a

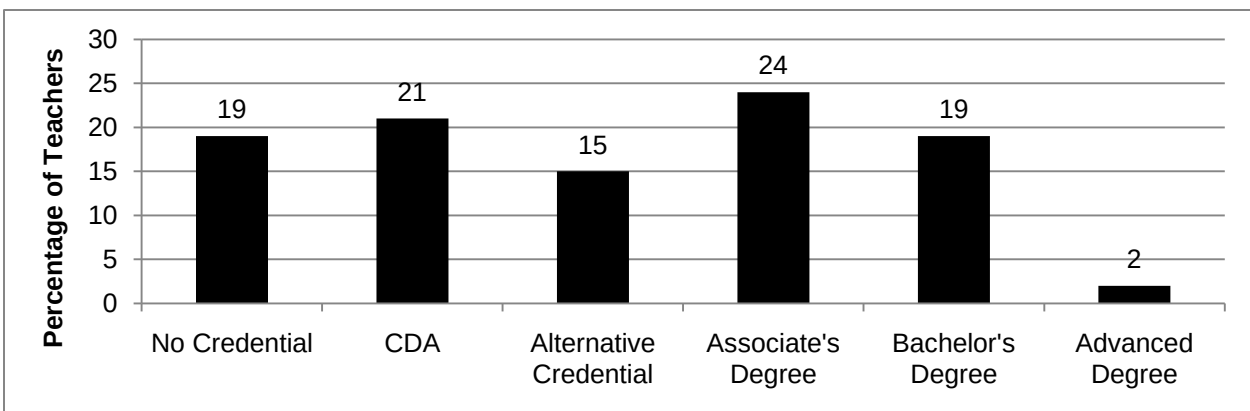
CDA. The Head Start Act required all Early Head Start teachers to have credentials that were equivalent to or exceeded a CDA by September 30, 2010.

Teachers from preexisting Early Head Start programs were more likely to have the required credentials than teachers from new programs, at 82 percent and 73 percent, respectively.³⁴ This difference may be due in part to the shorter time between new programs' start dates and the deadline. When the Head Start reauthorization was enacted in 2007, preexisting programs had nearly 3 years either to hire teachers with the required credentials or to ensure that teachers without credentials obtained them by the deadline. However, new programs had less than a year to ensure that all teachers had the required credentials, as the first distribution of Recovery Act funds occurred in November 2009.

Teachers had a variety of credentials. Twenty-one percent had CDAs. Forty-five percent had college degrees that were more advanced than a CDA, such as associate's, bachelor's, or advanced degrees.

Fifteen percent had alternative credentials aside from a college degree or a CDA. See Chart 1 for a breakdown of the education credentials.

Chart 1: Education Credentials of Early Head Start Teachers



Source: OIG analysis of Early Head Start teacher credentials, 2011.

³⁴ The difference was statistically significant at the 95-percent confidence level based on a Wald chi-square test, $p = 0.04$.

More than half of teachers without the required credentials were pursuing them

Although 19 percent of teachers did not have the required credentials, 56 percent of these teachers were pursuing them (11 percent of teachers overall). Teachers were considered to be pursuing credentials if they were enrolled in a degree program or applying for a CDA. The remaining 44 percent of teachers without credentials were not pursuing them (8 percent of teachers overall).

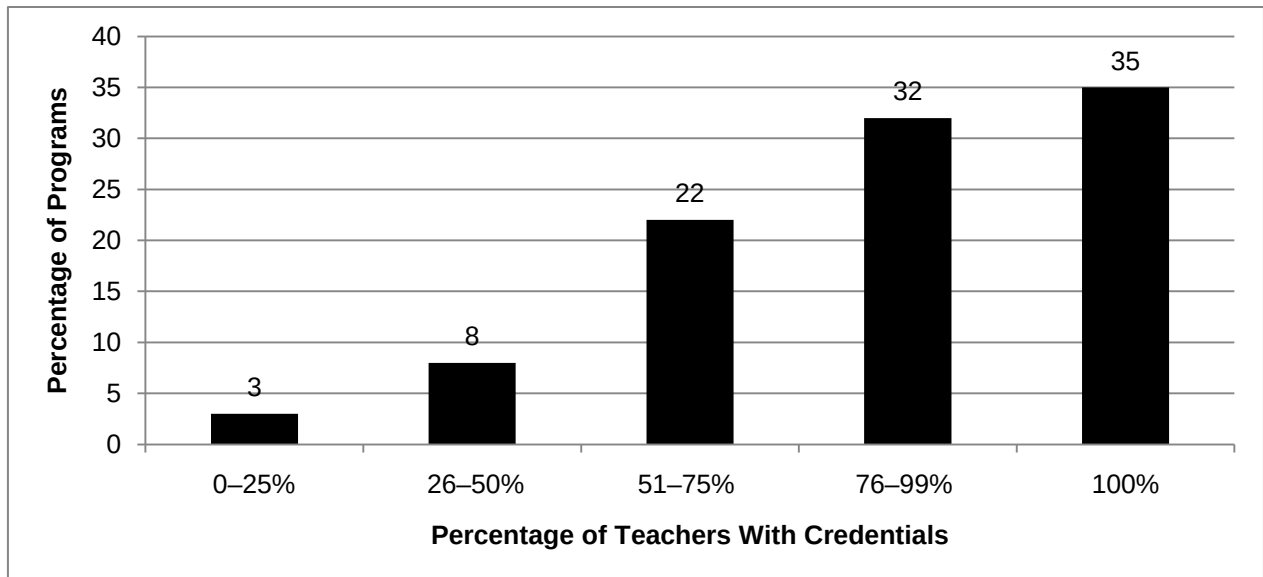
Teachers who were pursuing credentials may receive them in the near future. For example, 21 percent of teachers without credentials were applying for a CDA through the Council (4 percent of teachers overall). This means that they will most likely receive their CDA within a year's time, assuming that they submitted all of the paperwork correctly and that the Council awards the CDA in a timely fashion.

Approximately one-third of Early Head Start programs employed only teachers with the required credentials

Thirty-five percent of programs employed only teachers with the required credentials, whereas 65 percent employed at least

one teacher without the required credentials.

Overall, more than half of the teachers at 89 percent of programs had the required credentials. While approximately one-third of programs employed only teachers with the required credentials, 76–99 percent of teachers employed by another third of programs had the required credentials. In 3 percent of programs, 25 percent or fewer teachers had the required credentials, including 1 percent that did not employ any teachers with the required credentials. See Chart 2 for a breakdown of programs by percentage of teachers with the required credentials.

Chart 2: Programs by Percentage of Teachers With Required Credentials

Source: OIG analysis of Early Head Start teacher credentials, 2011.

Nearly all Early Head Start programs reported requiring teachers to complete training

Ninety-six percent of programs reported requiring teachers to complete ongoing training. This

indicates that almost all programs were attempting to ensure that all teachers met the training requirements, which are: (1) that all teachers have training in early childhood development by September 30, 2010; and (2) that all teachers have training in infant and toddler development by September 30, 2012.

In general, programs identified training topics that included early childhood development, infant and toddler development, safety, and communication methods. These topics correspond to the subject areas identified in the 1996 regulations. In addition, the topics appear to cover the broad areas outlined in the 2010 and 2012 training requirements. Some specific examples provided by programs included: developmentally appropriate curriculum, early literacy, sudden infant death syndrome, first aid, cardiopulmonary resuscitation, parent/teacher interaction, and responding to cultural diversity.

In addition, some programs also identified a variety of training topics focused on administering the Early Head Start program. These topics included State policies, procedures, and licensing requirements; performance standards; and records management.

Although most programs required training for teachers, the number of hours required varied widely. For example, programs' survey responses indicated a range of 0 to 140 hours per year, with a median of 15 hours per year. Only 3 of the 184 programs indicated that they did not expect teachers to receive any training hours in a year. This variation could occur, in part, because ACF has not provided guidance to programs regarding the amount of training that Early Head Start teachers must have.

Early Head Start programs may look to Head Start requirements for guidance about training. The Head Start Act defines the number of hours of training that Head Start teachers must receive. Head Start teachers have a yearly 15-hour in-service requirement.³⁵ In fact, 40 percent of Early Head Start programs required 15 hours of training per year.

Early Head Start programs reported challenges to employing only teachers with the required credentials and to training teachers

Most programs reported challenges either to employing only teachers with the required credentials or to training

teachers. In fact, 85 percent of programs identified at least one challenge to employing all teachers with the required credentials, and 87 percent of programs identified at least one challenge to training teachers. In particular, programs reported challenges to credentialing and training teachers because of problems with the workforce.

Eighty-three percent of Early Head Start programs reported challenges to employing only teachers with the required credentials

Many programs reported that they could not find teachers with credentials. In fact, there may not be a sufficient supply of teachers with credentials. In an October 2010 information memorandum, ACF recognized that Early Head Start programs may have difficulties finding qualified teachers. ACF recognized that the additional pressure to expand Early Head Start programs while finding teachers with credentials may create a demand-supply imbalance. In particular, new programs may have experienced challenges to finding teachers with credentials as a result of this imbalance.

Programs described some of their challenges to finding teachers with the required credentials. One program provided the following example:

³⁵ Head Start Act § 648A(a)(5), 42 U.S.C. § 9843a(a)(5).

We could not find qualified applicants that came to us with the required credentials. We hired staff that had experience in Early Childhood infants and toddlers who already had some documented hours of training and some of the required hours for the CDA process.

Early Head Start programs most commonly identified finding substitutes and managing work schedules as challenges to training teachers

Programs identified several challenges to training teachers. Most commonly, programs reported difficulties finding substitutes and managing work schedules as challenges to providing training, at 80 percent and 66 percent, respectively.³⁶

Programs indicated that if teachers attend training during the workday, they must either close the program for the day or find substitute teachers. Closing for the day can cause problems for parents who depend on full-day services. On the other hand, hiring substitutes raises concerns about continuity of care for the children. However, if training is offered during evening or weekend hours to lessen the need for substitutes, this creates a work-life imbalance for teachers. In many cases, programs indicated that they must pay overtime for training outside the scheduled workdays. In fact, 52 percent of programs stated that they did not have the funds to pay teachers overtime to attend training.

Programs described some of their challenges related to scheduling and finding substitutes. One clearly described its difficulties in finding substitutes and concerns about overtime pay: “Our pool of substitutes is not adequate for staffing EHS [Early Head Start] classrooms when [training] classes are offered during center hours of operation. Therefore, we would have to pay overtime that would adversely impact our budget.”

Another program discussed its concern that scheduling training causes work schedule problems:

Basically, classroom coverage is always a challenge. We want to have consistency and continuity of care for our children, so substitutes are not appropriate, unless they are regular and familiar with the children. Also, teachers are tired and have families. They want to go home in the evenings. Too many evening classes causes stress for them and their families.

³⁶ Programs reported these challenges more frequently than others. This difference is statistically significant at the 95-percent confidence level.

FINDINGS

Other challenges to training teachers appeared to be more prevalent in rural areas

Although most programs identified at least one training challenge, some appeared to be more prevalent in rural areas. For example, overall, 18 percent of programs reported challenges to identifying trainers for infant and toddler development in their areas. However, this challenge was heightened for programs in rural areas. Thirty-four percent of rural programs identified this as a challenge compared to 11 percent of urban programs. Table 2 compares challenges faced by rural and urban programs.

Table 2: Programs That Identified Challenges, Overall and by Rural and Urban Status

Challenge	Overall	Rural	Urban
Difficulty finding substitute teachers	80%	80%	80%
Difficulty managing training around work schedules	66%	71%	64%
Inadequate funds to pay teachers overtime to attend training	52%	59%	49%
Difficulty finding appropriate programs	30%	44%*	23%
Lack of funds to pay outside trainers	23%	34%*	17%
Lack of trainers for infant and toddler development	18%	34%*	11%
Lack of trainers for early childhood development	12%	24%*	6%
Trainers' refusal to travel to area	10%	17%*	6%

* Indicates a statistically significant difference between rural and urban programs at the 95-percent confidence level.

Source: OIG analysis of program survey responses, 2011.

Rural programs discussed unique challenges to providing training, such as distance between programs, travel time, and additional expenses related to travel. One program in particular provided a good overview of its difficulties trying to ensure that teachers receive training:

Our program has EHS [Early Head Start] in 5 rural counties and getting staff together for any training event is difficult due to distances that staff have to travel. We often get hotel rooms for these staff members to come to trainings. This is an extra expense to the program. The travel takes time and therefore time away from work with children and families. Our in house component trainers are also limited in making individualized visits to EHS sites again due to travel, distance and time. One of our sites is 2 hours away from the central office and to get to this site it

F I N D I N G S

requires traveling over a mountain which is not always safe in winter weather.

R E C O M M E N D A T I O N S

Overall, 81 percent of Early Head Start teachers had credentials that were equivalent to or exceeded a CDA. Approximately one-third of programs employed only teachers who met the education requirement that all teachers have a minimum of a CDA. Nearly all programs reported requiring teachers to complete training. However, most reported challenges either to employing only teachers with the required credentials or to training teachers. In particular, challenges related to the lack of a workforce and, in rural areas, finding appropriate training.

To increase the percentage of programs that employed only teachers with the required credentials and to help programs meet the requirements, we make the following recommendations to ACF:

Work with Early Head Start programs to ensure that all teachers have the required credentials

ACF should work to ensure that all Early Head Start programs employ only teachers with the required credentials. ACF could pursue a variety of options. For example, ACF could:

Provide additional support to Early Head Start programs that were newly developed with Recovery Act funds. Teachers from new programs were less likely to have credentials than teachers from preexisting programs.

Identify and share strategies used by programs that employed only teachers with the required credentials. Approximately one-third of programs employed only teachers with the required credentials. Their experiences and strategies may be useful to programs that do not employ only teachers with the required credentials.

Work with programs that employ teachers without the required credentials to develop and implement an action plan. Approximately two-thirds of programs did not employ only teachers with the required credentials. ACF could work with programs to develop an action plan to ensure that all teachers obtain the required credentials. This action plan may include ensuring that all teachers without credentials are pursuing them and that there is at least one credentialed teacher in each classroom.

Provide guidance to programs about training teachers

ACF should develop guidance regarding training, which may include an expected number of training hours or a list of suggested online coursework. It may also include guidance on what needs to be done to meet the training requirements for future teachers hired. Programs' survey responses varied widely in the amount of training they provided

R E C O M M E N D A T I O N S

to teachers, with a range from 0 to 140 hours per year and a median of 15 hours per year. Further, ACF has not provided guidance to programs regarding the amount of training that Early Head Start teachers must have.

In addition, because 87 percent of programs identified at least one challenge to training teachers, ACF's guidance should include suggestions for overcoming such challenges. This could include compiling a list of teachers, training, or courses available online. ACF could also work with programs to determine any lessons learned or successful strategies that could be shared with other programs. Particular attention should be paid to rural programs because challenges to training teachers appeared to be more prevalent in rural areas.

AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

ACF concurred with our recommendations. ACF described ongoing initiatives to increase the number of Early Head Start teachers with credentials, such as partnerships with educational institutions. It also stated that it plans to issue an information memorandum in the summer of 2011 to provide additional guidance for programs on teacher credentials and qualifications. In addition, ACF stated that it could provide guidance about teacher training, but that it could not require a certain number of training hours without a regulatory change.

We encourage ACF to issue both the planned information memorandum about teacher credentials and qualifications and guidance about teacher training. We did not make any changes to the report based on ACF's comments. For the full text of ACF's comments, see Appendix B.



A P P E N D I X ~ A

Estimates and Confidence Intervals

Table A-1: Estimates of Teachers With the Required Credentials

Estimate Description	Sample Size	Percentage	95-Percent Confidence Interval
Teachers with the required credentials	3,799	81.1%	77.6%–84.6%
Teachers from preexisting programs with the required credentials	3,257	82.5%*	78.7%–86.3%
Teachers from new programs with the required credentials	542	73.1%	65.6%–80.6%

* Actual result is 82.489 percent, which we rounded to 82.5 percent in this table and 82 percent in the findings.

Source: Office of Inspector General (OIG) analysis of Early Head Start teacher credentials, 2011.

Table A-2: Estimates of Teachers by Type of Credential

Estimate Description	Sample Size	Percentage	95-Percent Confidence Interval
Teachers with a child development associate (CDA) credential	3,799	21.4%	18.2%–24.6%
Teachers with any degree (i.e., associate's, bachelor's, or advanced degree)	3,799	44.6%	40.8%–48.5%
Teachers with alternative credentials	3,799	15.2%	11.4%–18.9%
Teachers with no credentials	3,799	18.9%	15.4%–22.4%
Teachers with associate's degrees	3,799	23.9%	20.8%–26.9%
Teachers with bachelor's degrees	3,799	18.8%	16.3%–21.3%
Teachers with advanced degrees	3,799	2.0%	1.5%–2.4%

Source: OIG analysis of Early Head Start teacher credentials, 2011.

Table A-3: Estimates of Teachers Pursuing Credentials

Estimate Description	Percentage of Teachers Without Credentials	Sample Size	Percentage of All Teachers	Sample Size
		95-Percent Confidence Interval		95-Percent Confidence Interval
Teachers who were pursuing credentials	56.4%	706	10.7%	3,799
		46.8%–66.0%		8.1%–13.2%
Teachers who were not pursuing credentials	43.6%	706	8.3%	3,799
		34.0%–53.2%		5.8%–10.7%
Teachers in the process of applying for CDAs	20.8%	706	3.9%	3,799
		14.1%–27.4%		2.6%–5.3%

Source: OIG analysis of Early Head Start teacher credentials, 2011.

Table A-4: Estimates of Programs Hiring Only Teachers With Required Credentials

Estimate Description	Sample Size	Percentage	95-Percent Confidence Interval
Programs that had only teachers with the required credentials	209	35.1%	29.2%–41.1%
Programs that did not have only teachers with the required credentials	209	64.9%	58.9%–70.8%

Source: OIG analysis of Early Head Start teacher credentials, 2011.

Table A-5: Estimates of Programs With Teachers Who Had the Required Credentials

Estimate Description	Sample Size	Percentage	95-Percent Confidence Interval
Programs in which the majority of teachers had the required credentials	209	88.8%	84.9%–92.7%
Programs in which 76–99% of teachers had the required credentials	209	32.2%	26.3%–38.0%
Programs in which 0–25% of teachers had the required credentials	209	3.2%	0.9%–5.5%
Programs in which 0% of teachers had the required credentials	209	1.0%	0.3%–3.4%
Programs in which 26–50% of teachers had the required credentials	209	8.0%	4.7%–11.3%
Programs in which 51–75% of teachers had the required credentials	209	21.5%	16.5%–26.6%

Source: OIG analysis of Early Head Start teacher credentials, 2011.

Table A-6: Estimates of Survey Responses Regarding Teacher Credentials and Training

Estimate Description	Sample Size	Percentage	95-Percent Confidence Interval
Programs that require teachers to complete ongoing training	212	95.5%	92.9%–98.1%
Programs that require 15 hours of training per year	184	40.0%	33.7%–46.4%
Programs that identified at least one challenge to having only teachers with the required credentials	98	84.7%	77.9%–91.5%
Programs that identified at least one challenge to training teachers	215	87.4%	83.3%–91.6%
Programs that could not find teachers with the required credentials	98	83.1%	76.1%–90.0%
Programs that reported finding substitutes as a challenge	213	80.3%	75.3%–85.2%
Programs that reported managing work schedules as a challenge	213	66.0%	60.2%–71.9%
Programs that reported not having funds to pay teachers overtime to attend training as a challenge	213	52.4%	46.2%–58.5%
Programs that reported challenges to identifying trainers for infant and toddler development in their areas	213	18.4%	14.2%–22.7%
Rural programs that reported challenges to identifying trainers for infant and toddler development in their areas	95	34.3%	26.8%–41.9%
Urban programs that reported challenges to identifying trainers for infant and toddler development in their areas	118	10.6%	5.5%–15.7%
Rural programs that reported finding substitutes as a challenge	95	80.1%	73.8%–86.5%
Urban programs that reported finding substitutes as a challenge	118	80.3%	73.7%–87.0%
Rural programs that reported managing work schedules as a challenge	95	71.1%	63.8%–78.3%
Urban programs that reported managing work schedules as a challenge	118	63.5%	55.6%–71.5%
Rural programs that reported not having funds to pay teachers overtime to attend training as a challenge	95	58.5%	50.6%–66.4%
Urban programs that reported not having funds to pay teachers overtime to attend training as a challenge	118	49.4%	41.1%–57.7%
Programs that reported finding appropriate training programs as a challenge	210	30.2%	24.8%–35.6%
Rural programs that reported finding appropriate training programs as a challenge	93	44.4%	36.3%–52.4%
Urban programs that reported finding appropriate training programs as a challenge	117	23.3%	16.3%–30.3%
Programs that reported not having funds to pay outside trainers as a challenge	211	22.5%	17.6%–27.4%
Rural programs that reported not having funds to pay outside trainers as a challenge	93	34.2%	26.5%–41.9%

continued on next page

Table A-6: Estimates of Survey Responses Regarding Teacher Credentials and Training (Continued)

Estimate Description	Sample Size	Percentage	95-Percent Confidence Interval
Urban programs that reported not having funds to pay outside trainers as a challenge	118	16.9%	10.6%–23.1%
Programs that reported challenges to identifying trainers for early childhood development	213	11.7%	8.3%–15.1%
Rural programs that reported challenges to identifying trainers for early childhood development	95	24.2%	17.3%–31.0%
Urban programs that reported challenges to identifying trainers for infant and toddler development in their areas	118	5.6%	1.7%–9.4%
Programs that reported trainers' refusal to travel to their areas as a challenge	207	9.6%	6.3%–13.0%
Rural programs that reported trainers' refusal to travel to their areas as a challenge	92	17.2%	11.1%–23.3%
Urban programs that reported trainers' refusal to travel to their areas as a challenge	115	5.9%	2.0%–9.9%

Note: The number of respondents varies because survey respondents did not answer every question.

Source: OIG analysis of program survey responses, 2011.

A P P E N D I X ~ B

Agency Comments



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
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370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

JUN 15 2011

TO: Daniel R. Levinson
Inspector General

FROM: David A. Hansell */SI/*
Acting Assistant Secretary
for Children and Families

SUBJECT: Office of Inspector General (OIG) Draft Report titled, "Most Early Head Start Teachers Have the Required Credentials, But Challenges Exist" (OEI-05-10-00240)

Attached is the Administration for Children and Families comments on the above-referenced OIG draft report.

Should you have questions or need additional information, please contact Yvette Sanchez Fuentes, Director, Office of Head Start, at 202-205-8573.

Attachment

**COMMENTS OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES ON
THE OFFICE OF INSPECTOR GENERAL DRAFT REPORT TITLED, "MOST EARLY
HEAD START TEACHERS HAVE THE REQUIRED CREDENTIALS, BUT
CHALLENGES EXIST" (OEI-05-10-00240)**

The Administration for Children and Families (ACF) appreciates the opportunity to comment on the above-cited Office of Inspector General (OIG) draft report.

OIG Recommendations

Overall, 81 percent of Early Head Start teachers had credentials that met or exceeded a Child Development Associates (CDA). Approximately one-third of programs employed only teachers who met the education requirement that all teachers have a minimum of a CDA. With regard to teacher training, nearly all programs reported requiring teachers to complete training. However, most programs reported challenges either to employing only teachers with the required credentials or to training teachers. In particular, challenges focused on the lack of an available workforce and, in rural areas, finding appropriate training for teachers.

To increase the percentage of programs that employed only teachers with the required credentials and to assist programs trying to meet the training requirements, we make the following recommendations to ACF:

Work with Early Head Start programs to ensure that all teachers have the required credentials

ACF should work to ensure that all Early Head Start programs employ only teachers with the required credentials. There are a variety of options that ACF could pursue. For example, ACF could:

Provide additional support to Early Head Start programs that were newly developed with Recovery Act funds. Teachers from new Early Head Start programs were less likely to have credentials than teachers from preexisting Early Head Start programs.

Identify and share strategies used by programs that employed only teachers with the required credentials. Approximately one-third of programs employed only teachers with the required credentials. Their experiences and strategies may be useful to share with programs that do not employ only teachers with the required credentials.

Work with programs with teachers without the required credentials to develop and implement an action plan. Approximately two-thirds of programs did not employ only teachers with the required credentials. ACF could work with programs to develop an action plan to ensure that all

teachers obtain the required credentials. This action plan may include ensuring that all teachers without credentials are pursuing them and that there is at least one credentialed teacher in each classroom.

ACF Comments

ACF concurs with this OIG recommendation and continues to utilize various resources (described below) to assist Early Head Start (EHS) programs in achieving the teacher credential requirement. Through partnerships and other mechanisms mentioned below, the Office of Head Start (OHS) provides training and technical assistance opportunities to grantees.

ACF issued an Information Memorandum (ACF-IM-10-06) to provide suggestions for the process and steps that EHS programs might consider to assure that they are hiring staff that have the appropriate qualifications, or are able to achieve the qualifications in a reasonable period of time. As stated in the IM, "This EHS expansion has created thousands of new infant and toddler teacher positions across the country. This unique and unanticipated change, coupled with increasing demand by public and private pre-K programs for credentialed teachers has created a 'demand-supply imbalance' which makes it extremely difficult currently for programs in certain locations to recruit and hire Child Development Associate (CDA) or equivalent credentialed teachers at this time."

OHS offers EHS "start-up planners" who are trained consultants to help new and existing EHS grantees with training resources and assistance in finding teachers with credentials or helping teachers plan to achieve required credentials.

Specific one-time quality funding was made available through the American Recovery and Reinvestment Act (ARRA) and could be used by EHS programs for teacher training and development.

An ongoing partnership with WestED in the Program for Infant Toddler Caregiving (PITC) also provides assistance to ARRA EHS programs. The PITC Institutes have trained over 4,000 EHS infant/toddler care teachers, home visitors and program managers since the program began in 1995.

The OHS Higher Education Partnership Grants facilitate the development of training models meant to increase the number of Head Start (HS) teachers with degrees in early childhood education. Prospective students and staff development managers can refer to this list of higher education grantees to learn the names of the Historically Black Colleges, Universities and Hispanic-serving Institutions, and Tribally Controlled Colleges and Universities that presently

are grant recipients. The ultimate goal of this grant program is to improve the quality and efficacy of HS and EHS grantee services.

The Early Childhood Learning Community (ECLC) was developed by the University of Cincinnati to offer an online early childhood associate's degree to early childhood teachers and HS and EHS staff who were unable to access a campus-based program. An online CDA is also available through ECLC and participants receive credit toward an associate's degree while completing the CDA. In 2005, ECLC decided to build upon its success by using Head Start Innovative and Improvement grant funds. A new bilingual/Spanish distance learning degree program was created to specifically target Migrant/HS teachers whose first language is Spanish. The HS program managers can learn from this case study how one university succeeded in broadening the academic opportunities for English/Spanish-speaking early childhood teachers as well as HS and EHS staff.

The Early Head Start National Resource Center (EHS NRC) serves the EHS community by building new knowledge and sharing information related to the unique needs of infants, toddlers, and expectant families. EHS NRC is staffed by individuals with a wide range of knowledge and expertise in the infant-family field. EHS NRC disseminates timely information through face-to-face meetings and state-of-the-art distant learning experiences.

ACF plans to issue an IM this summer to provide additional guidance for programs on teacher credentials and qualifications.

It is important to note that additional funding support for EHS teacher credentials will not be available unless appropriated by Congress.

OIG Recommendations

Provide guidance to programs about training teachers

ACF should develop guidance regarding training, which may include an expected number of training hours or a list of suggested online coursework. It may also include guidance on what needs to be done to meet the training requirements for future employees. Programs varied widely in the amount of training they provided to teachers, with a range from 0 to 140 hours per year and a median of 15 hours per year. Further, ACF has not provided guidance to programs regarding the amount of training that Early Head Start teachers must have.

In addition, 87 percent of programs identified at least one challenge to training teachers. Because of this, ACF's guidance should include suggestions for overcoming training-related challenges. This could include compiling a list of teachers, training, or courses that are available

online. ACF could also work with programs to determine any lessons learned or successful strategies that could be shared with other programs. Particular attention should be paid to rural programs because challenges to training teachers appeared to be more pronounced in rural areas.

ACF Comments

ACF concurs with this OIG recommendation, and some examples of training opportunities and resources are provided below. However, current statute and regulations do not mandate a specific number of hours for training. OHS could provide guidance, but could not require a set number of hours of training without a regulatory or statutory change.

The resources mentioned above, Early Learning Communities, PITC and EHS NRC, are resources utilized by all EHS grantees for training, professional development and technical assistance needs.

In addition, the Early Childhood Learning and Knowledge Center (ECLKC) website provides timely information and learning opportunities relevant to the HS and EHS community, and served as a comprehensive resource for anyone involved in early childhood education. ECLKC posts the latest information on OHS priorities, policies and programs, and offers tips and promising practices on many early childcare topics including child development, education, and health. In addition, online learning modules are offered on ECLKC which can be especially useful for teachers in areas where training challenges exist, such as rural areas.

OHS has created Project SOLAR (Strengthening Operations for Learning and Results), which is a set of web-based tools designed to support HS and EHS programs in their training and technical assistance, and staff development planning.



A C K N O W L E D G M E N T S

This report was prepared under the direction of Ann Maxwell, Regional Inspector General for Evaluation and Inspections in the Chicago regional office, and Thomas F. Komaniecki, Deputy Regional Inspector General.

Nicole Hrycyk served as the team leader for this study. Beth McDowell served as the lead analyst. Other principal Office of Evaluation and Inspections staff from the Chicago regional office who contributed to the report include Ericka Kilburn and Margarita Rodriguez; other central office staff who contributed include Talisha Searcy and Kevin Farber.

Office of Inspector General

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