Department of Health and Human Services

OFFICE OF
INSPECTOR GENERAL

ENROLLMENT LEVELS
IN HEAD START

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OBJECTIVES

1. To determine the enrollment levels of Head Start grantees.

2. To describe grantees' challenges to maintaining full enrollment.

3. To assess the Administration for Children and Families' (ACF) monitoring of enrollment.

4. To assess ACF's enforcement of full enrollment.

BACKGROUND

Established in 1964, Head Start is a nationwide program designed to increase school readiness in children from low-income families. Within ACF, the Office of Head Start administers Head Start. In fiscal year (FY) 2005, ACF provided $6.8 billion in funding to grantees for approximately 900,000 Head Start children. Grantees are local public agencies, private organizations, Native American tribes, and school systems.

To determine the enrollment levels of Head Start grantees, we analyzed attendance data from 200 randomly sampled grantees. We also surveyed sampled grantees and ACF staff regarding challenges to maintaining full enrollment. To assess ACF's monitoring of enrollment levels, we reviewed the accuracy of the enrollment data reported by grantees. To assess ACF's enforcement of full enrollment, we interviewed grantees and ACF staff.

FINDINGS

Almost all Head Start grantees had high enrollment levels. In the 2006 program year, 40 percent of grantees were fully enrolled. Eighty-one percent of Head Start grantees had enrollment levels of 95 percent or higher. Enrollment levels by grantee ranged from full enrollment to a low of 68 percent.

Overall, this translated into 5 percent of Head Start slots that were funded but not filled. Head Start slots that are funded but not filled equal Federal dollars that are inefficiently used.

Grantees cited challenges to maintaining full enrollment. Grantees cited the requirement to fill 90 percent of Head Start slots with very low-income children, competition with State and locally funded prekindergarten programs, and transportation issues as the biggest challenges to maintaining full enrollment.

ACF's monitoring of enrollment levels may rely on inaccurate data. For the 2006 program year, only 11 percent of grantees reported to ACF actual enrollment levels that matched the actual enrollment levels we determined based on attendance records. We also question the ability of 26 percent of grantees to maintain accurate attendance records and thus their ability to determine enrollment accurately.

ACF's enforcement of full enrollment has increased overall but varies by region. ACF has increased its practice of reducing or withholding funds to grantees not at full enrollment. However, reductions varied greatly by region. In particular, there were variations among regions in the levels of underenrollment that prompted funding reductions and the amounts of the reduction. ACF has also increased its supplemental monitoring and is providing additional technical assistance to grantees.

RECOMMENDATIONS

Based on the results of our review, ACF should:

Address grantee challenges to maintaining full enrollment. ACF should focus particular attention on the challenges identified in this report: the requirement that grantees fill 90 percent of slots with children from very low-income families, competition with State and locally funded prekindergarten programs, and transportation issues.

Ensure that enrollment data are accurate. To help ensure the accuracy of reported enrollment data, ACF should work with grantees to facilitate the maintenance of accurate attendance records and provide Program Information Report training to grantees.

Issue guidance concerning the use of funding reductions for grantees not at full enrollment. To ensure consistent enforcement of the full enrollment requirement, ACF should clarify guidelines to regional offices concerning the level of enrollment that warrants a funding reduction. ACF should also issue guidance concerning the calculation of funding reductions and the process of negotiating funding reductions with grantees.

AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

ACF indicated general support for our recommendations. However, ACF pointed out problems with two suggestions we offered on how our recommendation to address grantee enrollment challenges regarding the requirement that grantees fill 90 percent of slots with children from very low-income families might be implemented. We continue to recommend that ACF address grantees' reported challenges to maintaining full enrollment, including challenges related to the income-eligibility guidelines.

➤ T A B L E   O F   C O N T E N T S

➤ I N T R O D U C T I O N

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BACKGROUND

Head Start

Established in 1964, Head Start is a nationwide grant program designed to promote school readiness in children from low-income families. Head Start services include early childhood education; medical, dental, and mental health care; nutritional services; and efforts to encourage parental involvement.

Within ACF, the Office of Head Start (OHS) administers Head Start. OHS administers four Head Start programs: the Head Start program, the Early Head Start program, the American Indian–Alaska Native Head Start program, and the Migrant and Seasonal Head Start program. In fiscal year (FY) 2005, ACF funded approximately 900,000 slots for children, with the majority (800,750) of slots awarded to the Head Start program and the American Indian–Alaska Native Head Start program. We limited our study to these two Head Start programs, hereafter referred to as Head Start.

ACF awards Head Start funds directly to grantees. Grantees are local public agencies, private organizations, Native American tribes, and school systems. In FY 2006, ACF awarded funds to 1,405 grantees. Many Head Start grantees contract out the operation of services to delegate agencies that operate programs at the community level.

Head Start Eligibility

Head Start serves children from age 3 through the State mandatory school age (generally age 5). Head Start services are available to families who meet any of the following four criteria:

o The family income is at or below the poverty line (in FY 2006, $20,000 for a family of four)[1];

o The family receives Social Security Income (SSI) benefits;

o The family receives benefits or services on a regular basis[2] through Temporary Assistance for Needy Families (TANF); or

o The family cares for a foster child.

At least 90 percent of children enrolled by each Head Start grantee must be from low-income families. Head Start grantees may enroll children from families with incomes above the poverty line so long as they do not exceed 10 percent of total enrollment.[3] Grantees must also offer 10 percent of their slots to children with disabilities, regardless of income.[4]

Head Start Funding
Grantees' base funding is their historical funding amount from 1998. Additional funds are determined using a formula based on the number of children under age 5 living in poverty in each State.[5] Funding for all four programs of Head Start was $6.8 billion in FY 2005.[6]

Head Start funding covers not only the costs of program services (e.g., health services, teacher salaries, parent involvement services) but also administrative costs, including organizationwide management functions of accounting, budgeting, coordination, direction, and planning; as well as the management of payroll, personnel, property, and purchasing.[7] Because grantee funding covers both direct and indirect costs, ACF does not compute funding using a predetermined per-child formula.

Once ACF awards funds to a Head Start grantee, the funding continues until the grantee relinquishes the grant or ACF terminates it for cause.

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[1] Annual update of the Department of Health and Human Services Poverty Guidelines, 71 Federal Register 3848 (January 24, 2006).

[2] ACF Program Instruction, "Receipt of Public Assistance and Determining Eligibility for Head Start" (ACYF-PI-HS-99-06), July 29, 1999.

[3] 45 CFR § 1305.4(b)(2). A Head Start grantee operated by an Indian tribe may enroll up to 49 percent of its children from families whose income exceeds the low-income guidelines under certain conditions specified in 45 CFR § 1305.4(b)(3).

[4] Section 640(d) of the Head Start Act, 42 U.S.C. § 9835(d), and 45 CFR § 1305.6(c).

[5] Section 640(a)(4) of the Head Start Act, 42 U.S.C. § 9835(a)(4).

[6] Consolidated Appropriations Act, 2005, Pub. L. No. 108-447.

[7] 45 CFR § 1301.32(b) and (c).

After ACF grants the initial award, the grantee submits a noncompetitive continuation application for subsequent budget periods.[8]

Grantees are generally required to match 20 percent of their Head Start grant award with non-Federal funds.[9] According to ACF, most grantees fulfill this requirement through in-kind donations (e.g., subsidized space, volunteer staff); however, some grantees fulfill this requirement using State funds.

Enrollment Requirements

ACF assigns each grantee a specific number of children it is required to serve, known as the funded enrollment. In negotiating how many Head Start children a grantee will serve, ACF considers variation in grantee services and locality costs. By accepting their annual Head Start grant award, grantees agree to serve the number of children assigned.[10]

Head Start regulations require grantees to maintain enrollment at 100 percent of the funded enrollment level.[11] If a child stops attending Head Start, the grantee must establish that a vacancy exists. No more than 30 calendar days may elapse before the grantee fills the vacancy; otherwise, ACF considers the grantee underenrolled. ACF refers to a vacancy left open more than 30 days as an "enrollment vacancy." If fewer than 60 days remain in the grantee's program year at the time an enrollment vacancy occurs, the grantee can choose not to fill the vacancy without ACF considering it underenrolled.

To facilitate prompt filling of vacancies, Head Start regulations require each grantee to maintain a waiting list that ranks children according to its selection criteria and to select those with the greatest need for Head Start services.[12]

Monitoring Enrollment

Nationally, ACF monitors Head Start enrollment through the Program Information Report (PIR) and the Program Review Instrument for

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[8] ACF, "Application and Grant Award Process." Available online at http://eclkc.ohs.acf.hhs.gov/hslc/Program%20Design%20and%20Management/Fiscal/Grant%20Award%20Process/Grant%20Award%20Process/fiscal_pub_00154a_080905.htm. Accessed on January 9, 2007.

[9] Section 640(b) of the Head Start Act, 42 U.S.C. § 9835(b), and 45 CFR § 1301.20.

[10] 45 CFR § 1305.2(f).

[11] 45 CFR § 1305.7(b).

[12] 45 CFR § 1305.6.

Systems Monitoring (PRISM). Regional and branch offices monitor enrollment through ongoing contact with grantees in their regions.

Federal regulations require grantees to "establish and implement procedures for ongoing monitoring."[13] Grantees use PIR software to self-report enrollment, demographic, and performance data to ACF. Grantees report a variety of information, including their funded enrollment and actual enrollment levels. Two studies from the Office of Inspector General (OIG), "Status of Efforts To Increase Qualifications of Head Start Teachers" and "Head Start Services for Children With Asthma," cited concerns related to PIR data.[14] These reports noted that grantees receive little training or guidance about completing the PIR and questioned the usefulness of PIR data.

In 2003, the Government Accountability Office (GAO) found that ACF could not determine the level of enrollment in Head Start from PIR data because of inaccuracies in the database and reporting delays.[15] GAO also noted that data often arrived after the beginning of the subsequent program year and that ACF allowed grantees to select the 2 months for which they provided enrollment figures. [16]

In 2006, ACF addressed some of these issues. Specifically, ACF now requires grantees to report enrollment levels for 3 specified months. Additionally, grantees must submit their enrollment data for these 3 months as soon as each month has ended.[17]

PRISM is a standardized instrument used by ACF staff to conduct comprehensive reviews of Head Start grantees. Each Head Start grantee receives a PRISM review every 3 years. This intensive, weeklong review covers all aspects of grantees' performance, including enrollment. Using PRISM, reviewers calculate a grantee's enrollment by counting the number of children enrolled during the week of their onsite review.

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[13] 45 CFR § 1304.51(i)(2).

[14] "Status of Efforts To Increase the Qualifications of Head Start Teachers" (OEI-07-01-00560), 2004; and "Head Start Services for Children With Asthma" (OEI-09-01-00330), 2002.

[15] "Head Start: Better Data and Processes Needed To Monitor Underenrollment," (GAO-04-17), p. 2.

[16] Ibid, p. 14.

[17] ACF Information Memorandum, "On-line Reporting Beginning in November, 2006" (ACF-IM-HS-06-04), September 12, 2006.

Enforcing Full Enrollment

Maintaining full enrollment was a major focus of the 2004 Head Start Management Initiative.[18] The initiative reiterated the regulatory definition of underenrollment as anything less than 100 percent enrollment. The initiative stated that ACF would hold systematic, periodic discussions with grantees related to enrollment.

Head Start regulations and guidance specify that grantees that do not maintain full enrollment may be referred for technical assistance or may face a reduction in funding, denial of refunding, or termination of financial assistance. [19] Regulations and guidance do not specify the amount of the reduction.[20] ACF reports that most reductions are subject to negotiations between the regional offices and grantees.

Head Start regulations state that ACF can terminate a grant or deny refunding if a grantee received a deficiency because of underenrollment and failed to correct the deficiency.[21] In addition, ACF guidance states that ACF can decrease funding in situations in which enrollment issues are caused by changing demographics that have resulted in insufficient numbers of eligible children in a grantee's service area.[22]

An amendment to the Head Start Act was proposed, but not enacted, during the 109th Congress that would have required grantees to report their enrollment to the Secretary of Health and Human Services, who then would have been required to develop plans to reduce or eliminate underenrollment for any grantee less than 95-percent enrolled. The bill also provided for the recapture, reduction, or withholding of a portion of a grantee's basic grant in the case of chronic underenrollment.[23]

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[18] Head Start Management Initiative, 2004. Available online at: http://eclkc.ohs.acf.hhs.gov/hslc/Program%20Design%20and%20Management/Fiscal/Manag ement%20Initiatives/Accountability/fiscal_rep_00058_061605.html. Accessed on January 9, 2007.

[19] 45 CFR §§ 1304.60, 1304.61, and 1305.10; ACF Program Instruction, "Achieving and Maintaining Full Enrollment" (ACYF-PI-HS-04-03), November 30, 2004.

[20] Ibid.

[21] 45 CFR §§ 1304.60, 1304.61, and 1305.10.

[22] "Achieving and Maintaining Full Enrollment" (ACYF-PI-HS-04-03).

[23] School Readiness Act of 2005, H.R. 2123, 109th Cong., § 8(f) (as passed by the U.S. House of Representatives, October 25, 2005).

Hispanic Families

Although Hispanic families compose 14 percent of the population nationwide, Hispanic children represent 22 percent of the population under 5 years of age.[24] Twenty-two percent of the Hispanic population lives in poverty, and almost one-third of Hispanic children under age 5 lives in poverty.[25] Concerns have been raised that grantees in areas with recent growth in Hispanic population may have difficulty recruiting these families because of cultural and linguistic issues.

METHODOLOGY

To determine the enrollment levels of Head Start grantees, we analyzed attendance data from 200 grantees randomly selected from a stratified sample. For grantees' 2005–2006 operating period,[26] hereafter referred to as the 2006 program year, we compared grantees' actual enrollment to their funded enrollment. We also surveyed sampled grantees and ACF staff regarding challenges to maintaining full enrollment. See Table 1 for the definitions of key terminology used when discussing grantee enrollment levels.

Table 1: Key Terminology	
Attendance data	A grantee's daily record of children who are present. If a child does not attend for 30 consecutive days, the child is no longer considered enrolled.
Actual enrollment	The number of children enrolled with the grantee as of the end of a month.
Funded enrollment	The number of children the grantee is funded to enroll, as determined by ACF and as stated in the grantee's application.

Source: OIG summary of key terminology, 2006.

To assess ACF's monitoring of enrollment levels, we reviewed the accuracy of PIR enrollment data and attendance records submitted by grantees. To assess ACF's enforcement of full enrollment, we interviewed ACF staff and grantees. Lastly, we reviewed all Head Start laws, regulations, and policies pertinent to enrollment.

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[24] U.S. Census Bureau, Current Population Survey, Annual Social and Economic Supplement, 2005. These figures were generated using the Microdata Access, Current Population Survey Table Creator. Available online at http://www.census.gov/hhes/www/cpstc/cps_table_creator.html. Accessed on January 9, 2007.

[25] Ibid.

[26] Operating period is defined by the grantee's contract, and the months covered can differ by grantee.

Below we provide a basic description of our methodological approach. See Appendix A for a more detailed description of our methodology.

Sample

This study determines the enrollment levels for Head Start grantees in the 50 States and Washington, DC, hereafter referred to as the 51 States. As previously stated, we excluded grantees from the Early Head Start and Migrant and Seasonal programs. We excluded Early Head Start grantees because this is a much smaller program that, according to ACF staff, does not face the same enrollment challenges. We excluded the Migrant and Seasonal program grantees because they face a unique set of logistical, recruitment, and enrollment challenges not typical of other grantees.

We also excluded 28 grantees in American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the Virgin Islands because the U.S. Census Current Population Survey does not capture Hispanic data for these locations and we therefore could not stratify grantees in these areas appropriately. The exclusion of these 28 grantees brought our study population to 1,377 grantees. We randomly selected 200 grantees out of the 1,377 grantees in the 51 States.

To assess enrollment issues related to the shifting Hispanic population, we stratified our sample according to recent growth in the Hispanic preschool-age population using U.S. Census data. Grantees in counties where the total Hispanic population age 4 and under[27] increased by more than 40 percent between 2000 and 2004 fell into the "Hispanic-growth" stratum; the remaining grantees were placed in the "nongrowth" stratum. [28] To improve our estimates, we also stratified by grantee size. See Table 2 on the next page for our stratified sampling structure.

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[27] This was the most appropriate census category available.

[28] U.S. Census Bureau, Current Population Survey, Annual Social and Economic Supplement, 2000–2004, Ethnicity and Ancestry Statistics Branch, Population Division.

Table 2: Sample Structure				
Stratum Number	Stratum Description	Grantee population	Number of grantees selected	Number of grantees whose attendance data were reviewed
	Hispanic-growth grantees	221	75	68
1	Small grantees (funded enrollment <=1,600)	211	65	58
2	Large grantees (funded enrollment >1,600)	10	10	10
	Nongrowth grantees	1,156	125	111
3	Small grantees (funded enrollment <=600)	908	55	49
4	Medium grantees (funded enrollment 601–6,000)	241	63	56
5	Large grantees (funded enrollment >6,000)	7	7	6
Total		**1,377**	**200**	**179**

Data Collection

We obtained data for this study from grantee attendance records, grantee surveys, and interviews with ACF staff. We also obtained 2006 program year PIR data.

We requested 3 months (November 2005 and January and April 2006) of attendance records from sampled grantees. We selected these 3 months after consulting with grantees in pretest interviews to ensure that these months were representative of enrollment during the rest of those years.[29]

Although our request for attendance data yielded a response rate of 93 percent, we reviewed attendance data for 90 percent (179 of 200) of sampled grantees. We did not review all attendance records we received because some grantees did not include attendance data for all of their delegate agencies, or they submitted such a large volume of paper attendance records that we could not analyze them within the timeframe of the study.

In June 2006, we surveyed grantees to ascertain their difficulty in maintaining full enrollment and to identify challenges affecting enrollment. Overall, our survey achieved a response rate of 95 percent

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[29] We did not select the last 2 months of the program year because of the exemption that allows grantees to leave a vacancy open if it occurs within 60 days of the end of the program year. See 45 CFR § 1305.7(b).

(189 of 200). We also asked ACF staff to identify challenges grantees face in maintaining full enrollment.

To assess ACF's oversight of enrollment levels, we conducted structured interviews with ACF headquarters staff and key staff in all 10 regional offices and the American Indian–Alaska Native program office (hereafter referred to as 11 regional offices).

Data Analysis

To determine grantees' enrollment, we counted all children who attended at least once within each month (i.e., 30 calendar days). We determined the level of actual enrollment by averaging grantees' attendance data over the 3 sampled months. We then compared grantees' actual enrollment as determined based on attendance records to their funded enrollment as reported by ACF.

To assess ACF's monitoring of enrollment, we reviewed the accuracy of grantee data self-reported to the PIR and attendance records submitted to OIG. We compared the actual enrollment levels reported by grantees in the PIR to our determination of actual enrollment based on attendance records. We also compared grantees' reported funded enrollment to the funded enrollment figures provided by ACF. Finally, we assessed the ability of grantees to provide us with complete, unduplicated attendance records based on our data request.

Unless otherwise noted, we projected all statistics to the population of Head Start grantees in our study. See Appendix B for a list of 95-percent confidence intervals for all statistical projections.

Limitations

Although we requested that grantees provide data for ACF-funded children only and pretested our instruments to ensure their validity, some grantees may have incorrectly submitted attendance records for State-funded children. However, we believe that the risk of this occurring is minimal because ACF regularly asks grantees to distinguish between ACF-funded and State-funded enrollment for the PIR. Further, when grantees use State funds as the 20-percent fiscal match, children served through these matching funds are considered ACF-funded children.

Standards

This study was conducted in accordance with the "Quality Standards for Inspections" issued by the President's Council on Integrity and Efficiency and the Executive Council on Integrity and Efficiency.

➤ F I N D I N G S

Almost all Head Start grantees had high enrollment levels

Overall, enrollment rates by grantees were high. Forty percent of grantees were fully enrolled in the 2006 program year. Eighty-one percent of grantees had enrollment levels of 95 percent or higher. Ninety-one percent of grantees had enrollment levels in excess of 90 percent, leaving only 9 percent of grantees with enrollment levels less than 90 percent. See Table 3 for a breakdown of the enrollment levels by stratum.

Table 3: Percentage of Grantees by Enrollment Levels			
Enrollment Levels	**Percentage of Grantees**		
	All Grantees	**Grantees in Hispanic-Growth Areas**	**Grantees Not in Hispanic-Growth Areas**
100%	**40%**	**41%**	**40%**
≥ 95% and < 100%	**41%**	**50%**	**40%**
≥ 90% and < 95%	**10%**	**3%**	**11%**
Less than 90%	**9%**	**6%**	**9%**

Source: OIG analysis of grantee enrollment, 2006.

Despite grantees' overall high enrollment levels, the Head Start program did experience underenrollment. Enrollment levels by grantees in our sample ranged from full enrollment to a low of 68 percent.[30]

Nationally, an estimated 5 percent of slots were funded but unfilled
The 5 percent of funded but unfilled slots represents approximately 33,726 enrollment vacancies. Given the $6.8 billion cost of the Head Start program, less-than-full enrollment could represent ineffective use of considerable Federal dollars. Additionally, less-than-full enrollment may mean that vulnerable children are not receiving early childhood services for which they are eligible.

Grantees in areas with recent growth in the Hispanic population had levels of enrollment similar to those of grantees in all other areas
Concerns have been raised that grantees serving areas with a recent growth in the Hispanic population may have difficulty maintaining full enrollment because they may have difficulty modifying their recruitment strategies to adapt to the cultural and linguistic differences

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[30] Eighteen grantees in our sample had enrollment levels lower than 90 percent, and three grantees were less than 70-percent enrolled.

in the shifting population. However, more grantees in the Hispanic-growth areas were at least 95-percent enrolled than grantees in all other areas. Specifically, 91 percent of grantees in Hispanic-growth areas were at least 95-percent enrolled, while 80 percent of grantees in the non-Hispanic-growth areas were at least 95-percent enrolled. This difference is statistically significant at the 95-percent confidence level. This statistical difference implies that grantees serving areas with high growth rates of Hispanic children have higher enrollment levels. We did not evaluate grantees' recruitment and enrollment of Hispanic children.

Nine regional offices reported a growth of Hispanic families in their regions. None of the staff from these offices believe that the increase poses a challenge for enrollment. In fact, staff from two regional offices reported that the increase in this population helps grantees to maintain full enrollment; one office stated that this is because grantees in Hispanic-growth areas have a larger income-eligible population from which to enroll. Moreover, 80 percent of grantees that reported recent increases in Hispanic families in their service areas reported changing their recruitment strategies to reflect this population change. The most common changes to recruitment strategies were translating program material into Spanish and hiring Spanish-speaking staff.

Grantees cited challenges to maintaining full enrollment

Fifty-five percent of grantees reported difficulty maintaining full enrollment during the 2006 program year.[31] Even among grantees with enrollment levels of 95 percent or higher, 49 percent reported difficulty. Grantees who reported difficulties were asked to identify the specific challenges that they faced in maintaining full enrollment. Grantees cited the requirement to fill 90 percent of Head Start slots with very low-income children, competition with State and locally funded prekindergarten programs, and transportation issues. Many ACF regional offices also cited that these challenges face grantees in maintaining full enrollment.

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[31] In our sample, 106 of 189 grantees reported difficulty maintaining full enrollment. The projected percentage is 55 percent of grantees. Because data are self-reported, the noted challenges are the grantees' perceptions and not demonstrated reasons that grantees are not at full enrollment.

See Table 4 for the percentage of grantees and the number of ACF regional offices that cited each challenge.

Table 4: Challenges to Maintaining Full Enrollment		
	Percentage of grantees that reported challenge	**ACF regional offices that reported challenge**
Income requirements too low	71%	6 of 11
Competition with other childcare programs	49%	9 of 11
Transportation issues	46%	6 of 11

Source: OIG analysis of grantee surveys and ACF interviews, 2006.

Grantees report that the income requirement is too low for their service areas

Among the 55 percent of grantees that reported difficulty maintaining full enrollment, 71 percent stated that the dollar amounts of the income requirements are too low for their service areas. As a result, grantees reported difficulty recruiting enough eligible families. Similarly, 41 percent of grantees noted a decline in the number of eligible families in their service areas.

Grantees reported that the working poor in their service areas earn incomes slightly above the poverty guidelines, often at 120 to 150 percent of the poverty level,[32] and therefore do not qualify for Head Start. For example, a family of four with two parents earning the Federal minimum wage, $5.15/hour,[33] would earn enough to be slightly over the Head Start income guidelines. This problem is of even greater concern to grantees in States with higher minimum wages.

Twenty-six percent of grantees stated that they could better maintain full enrollment if ACF increased the income threshold or if ACF permitted grantees to serve a greater number of families that are above the stated income guidelines.

Grantees report that competition with other childcare programs is a challenge

Another reported challenge to maintaining full enrollment relates to the recent growth in the number of subsidized State and locally funded

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[32] This amounts to $24,000–$30,000/year for a family of four, respectively.

[33] Section 6(a) of the Fair Labor Standards Act of 1938, as amended (29 U.S.C. § 206(a)(1)).

prekindergarten programs. Of the 55 percent of grantees that reported difficulty maintaining full enrollment, 49 percent stated that they compete with these programs for eligible children. According to grantees, these programs are often more convenient to a parent's job, the family's home, or places siblings are enrolled, or are more compatible with full-time work schedules. Further, grantees noted that State and locally funded programs can often recruit Head Start-eligible families in addition to families above the poverty guidelines because these programs do not have to comply with Federal income requirements.

Grantees report that they are unable to provide, or face obstacles in providing, transportation services
Of the 55 percent of grantees that reported difficulty maintaining full enrollment, 46 percent reported transportation issues as a challenge to maintaining full enrollment: either they are unable to provide transportation at all or they face obstacles to providing it. Some grantees in rural areas find that eligible families live outside their transportation service areas. Budget constraints have forced grantees in both urban and rural areas to reduce or eliminate bus routes. In addition, grantees stated that State programs are able to offer transportation while many Head Start grantees are not, further contributing to a competitive disadvantage.

ACF's monitoring of enrollment levels may rely on inaccurate data

ACF primarily relies on PIR data to monitor enrollment. We found inaccuracies in the grantee-reported actual enrollment and funded enrollment data in the PIR. We also have concerns about the accuracy of the attendance records some grantees use as the basis for reporting their actual enrollment to the PIR.

Most grantees reported inaccurate enrollment data in the PIR
For the 2006 program year, only 11 percent of grantees reported actual enrollment levels that matched those we determined based on our review of grantee-provided attendance records. Of the 89 percent of grantees that misreported their actual enrollment levels, 69 percent overreported their enrollment and 19 percent underreported their enrollment. The net effect of this misreporting is an overreporting by 38,587 children. Of the grantees that misreported, 20 percent

misreported by more than 50 children, which accounts for 88 percent of the misreporting.

Grantees' overreporting affects ACF's ability to monitor enrollment using PIR data. According to the 2006 PIR data, total actual enrollment was 4 percent higher than the total funded enrollment. By contrast, in reviewing attendance records, we determined that the total actual enrollment was an estimated 5 percent lower than total funded enrollment.

Similarly, our review indicated that 40 percent of grantees were fully enrolled, while PIR data indicated that 59 percent of grantees were fully enrolled. We found that 9 percent of grantees had enrollment rates of less than 90 percent. According to PIR data, only 1 percent of grantees were less than 90-percent enrolled. See Table 5 for a full comparison of the OIG review of enrollment levels by grantee to the reported PIR data.[34]

Table 5: Percentage of Grantees by Enrollment Levels (OIG vs. PIR)		
Enrollment Levels	**Percentage of Grantees**	
	OIG review	**PIR**
100%	**40%**	**59%**
≥95% and <100%	**41%**	**36%**
≥90% and <95%	**10%**	**5%**
Less than 90%	**9%**	**1%**

Source: OIG analysis of grantee enrollment and PIR data, 2006.

In addition to reporting actual enrollment, grantees report their understanding of their funded enrollment in the PIR. In the 2006 program year, 7.5 percent of grantees reported in the PIR funded enrollment levels different from levels in official ACF records. Fifty-seven percent of these inaccuracies involved differences of more than 20 slots from official ACF records. ACF headquarters staff could not identify reasons for these discrepancies. These differences limit the validity of the PIR and raise concerns that some grantees are unaware of the number of children whom they are responsible for serving.

Two previous OIG reports highlight the need for PIR training to ensure accurate reporting.[35] The inaccuracies in PIR data suggest that

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[34] There are no statistically significant differences between OIG and PIR enrollment levels for grantees 95- to less than 100-percent enrolled and 90 to less than 95-percent enrolled.

[35] "Status of Efforts To Increase the Qualifications of Head Start Teachers," and "Head Start Services for Children With Asthma."

grantees are still not receiving PIR training. Only 3 of 11 regional offices reported providing PIR training to grantees and only 6 percent of grantees reported receiving any (PIR or other) enrollment-related training from their regional offices.

The ability of 26 percent of grantees to produce accurate attendance counts is questionable

PIR data may be inaccurate if Head Start grantees are unable to accurately monitor attendance and thus determine enrollment. In conducting this review, we had significant concerns about the ability of 26 percent of grantees to produce accurate attendance counts. We determined accurate enrollment counts for these grantees only after a labor-intensive cross-check among multiple files.

In response to our data request, 74 percent of sampled grantees provided records for all children they served in a given month compiled into a single file or list, or used a system capable of producing such a report.[36] Twenty-two percent of grantees submitted attendance data separated by classroom or delegate agency and did not appear to have systems capable of compiling accurate attendance lists. Another 4 percent of grantees could not provide us with completed attendance data because they could not collect attendance records from all of their delegate agencies or the burden of gathering their attendance data would have taken longer than the study allowed.[37]

ACF's enforcement of full enrollment has increased overall but varies by region

Regional offices reported taking a variety of enforcement actions with grantees that were not fully enrolled. The most commonly cited enforcement action was withholding or reducing funds. Other commonly cited actions include supplemental monitoring and providing technical assistance.

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[36] Several electronic software packages are capable of producing an unduplicated, complete list of children. Therefore, grantees that submitted data from one of these systems could produce accurate counts of their enrollment.

[37] We accepted grantee data up to 2.5 months after our initial data request.

ACF's action of reducing or withholding funds has increased, but its use varies by region

Reducing or withholding funds as an enforcement action has increased since 2003. At that time, three regional offices reduced funds for six grantees, and two regional offices withheld funds.[38] In the 2006 program year, 8 regional offices reported that they reduced funds for 30 grantees. In addition, three regional offices temporarily withheld funding until the grantees achieved full enrollment.[39]

The levels of enrollment that prompted regions to reduce funds varied widely in 2006: five regions reported reducing funds when a grantee was chronically underenrolled,[40] one region reduced funds when enrollment levels fell below 90 percent, and one region reported reducing funds to grantees less than 100-percent enrolled. Among the eight regional offices reporting funding reductions, four reduced funds when the number of eligible families in grantees' service areas declined.

The amount of funding reductions imposed by regions also varied. To determine funding reductions, 6 of 11 regional offices reported that they negotiate a cost-per-child reduction less overhead and administrative costs. Among the 30 grantees that experienced funding reductions in 2006, there was over a $9,000 range between the cost-per-child reduction.[41]

The observed range of reductions per enrollment vacancy may be attributed to a number of factors. First, there is no standard Head Start cost per child. Therefore, grantees funded to serve the same number of children may receive different grant awards. Second, regional offices, in consultation with ACF, negotiate funding reductions with grantees. Lastly, the only guidance ACF headquarters provides to regional offices describes situations in which a funding reduction may

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[38] "Head Start: Better Data and Processes Needed To Monitor Underenrollment" (GAO-04-17), p. 25.

[39] These grantees had between 10 and 200 enrollment vacancies.

[40] Three regional offices did not define "chronic," one regional office defined a grantee as chronically underenrolled when the grantee was underenrolled for at least 6 months, and one regional office defined a grantee as chronically underenrolled when a grantee was underenrolled for at least 1 year.

[41] The 30 grantees that lost funding in the 2006 program year lost between $906 and $10,000 per enrollment vacancy.

be appropriate. [42] The guidance does not specify how to determine the amount of the reduction or the process of negotiation.

Supplemental monitoring and technical assistance also increased
Since 2003, ACF has also increased its use of supplemental monitoring and technical assistance as enforcement actions. In 2003, only five regional offices increased monitoring and three provided technical assistance in response to underenrolled grantees.[43] In the 2006 program year, 8 of 11 regional offices increased monitoring and 6 of 11 provided technical assistance to grantees not at full enrollment.

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[42] Once a regional office becomes aware of an underenrolled grantee, the grantee generally has 90 days to correct the problem. If the grantee remains underenrolled, it may be cited as deficient and given another period, not to exceed 90 days, before the regional office begins the process of a funding reduction or termination. "Achieving and Maintaining Full Enrollment" (ACYF-PI-HS-04-03).

[43] "Head Start: Better Data and Processes Needed To Monitor Underenrollment" (GAO-04-17), p. 25.

We found relatively high levels of enrollment among Head Start grantees. In fact, 81 percent of grantees were at least 95-percent enrolled in the 2006 program year. Despite high enrollment, more than half of grantees reported challenges to maintaining full enrollment. In addition, we found continued inaccuracies in the data used to monitor enrollment. Finally, we found that although ACF enforcement of full enrollment had increased, enforcement varied by region.

Based on the results of our review, ACF should:

Address Grantee Challenges to Maintaining Full Enrollment
ACF should focus particular attention on the challenges identified in this report: specifically, the requirement that grantees fill 90 percent of slots with children from very low-income families, competition with State and locally funded prekindergarten programs, and transportation issues.

o To address concerns regarding the requirement that grantees fill 90 percent of slots with children from very low-income families, ACF could amend its regulations to increase the allowable percentage of eligible families that exceed the income guidelines or assist grantees in identifying and recruiting categorically eligible families, i.e., those receiving TANF or SSI or those with foster children.

o To address concerns about competition with State and locally funded prekindergarten programs, ACF could work with grantees to increase coordination with these programs. Increased coordination could help ensure that States make information available to parents about Head Start programs.

o To address concerns regarding transportation, ACF could provide technical assistance to grantees regarding transportation resources.

Ensure That Enrollment Data Are Accurate
To help ensure the accuracy of reported enrollment data, ACF should:

o Work with grantees to maintain accurate attendance records. To facilitate this, ACF could encourage the use of electronic attendance records.

o Provide PIR training to grantees.

o Fill in the grantee's funded enrollment field in the PIR. Because ACF establishes the funded enrollment level, there is no need to ask

grantees to report this. This allows for an unnecessary source of reporting error.

Issue Guidance Concerning the Use of Funding Reductions for Grantees Not at Full Enrollment

To ensure consistent enforcement of the full enrollment requirement, ACF should:

o clarify guidelines to regional offices concerning the level of enrollment that warrants a funding reduction, and

o issue guidance to regional offices concerning the calculation of funding reductions and the process of negotiating funding reductions with grantees.

AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

ACF indicated general support for our recommendations. However, ACF pointed out problems with two suggestions we offered on how our recommendation to address grantee enrollment challenges regarding the requirement that grantees fill 90 percent of slots with children from very low-income families might be implemented. First, ACF stated that it is not within its purview to change the income guidelines. Second, ACF did not support our suggestion to amend its regulation to increase the allowable percentage of eligible Head Start families that exceed the low-income guidelines. ACF felt that this change would allow grantees to enroll higher-income children without ensuring participation by the neediest children. The complete text of ACF's comments is located in Appendix C.

We understand ACF's concern that Head Start continue to serve the neediest children. However, grantees cited the current Head Start income-eligibility requirements as a challenge to maintaining full enrollment. Thus, we continue to recommend that ACF address grantees' reported challenges to maintaining full enrollment, including challenges related to the income-eligibility guidelines.

ACF's technical comments are not included in Appendix C, but we made changes in the report where appropriate.

DETAILED METHODOLOGY

Sample

To improve the precision of our enrollment estimates, we stratified our sample by grantee size. Within the Hispanic-growth stratum, we created two substrata based on size; within the nongrowth stratum, we created three substrata based on size. The size-of-grantee strata are defined differently for the Hispanic-growth stratum and the nongrowth stratum because the relative sizes of grantees are different for these groups (i.e., there are more large grantees in the nongrowth stratum). We do not make comparisons of grantees based on their size.

Data Collection

Data for this study came from grantee attendance records, grantee surveys, interviews with the Administration for Children and Families (ACF) staff, and 2006 program year Program Information Report (PIR) data.

To ensure the construct validity of our grantee survey instrument and data request for attendance records, we pretested both on a subset of 22 grantees. After the grantees responded, we contacted them by phone to conduct a short cognitive interview to determine whether the survey and data request were clear and understandable. The vast majority of grantees interpreted the questions as we intended. We altered the few unclear questions to make them more understandable. We included these pretested grantees in the final sampling frame.

We also conducted in-depth reviews of attendance records for 9 of the 22 Head Start grantees selected for pretesting. In these reviews, we compared grantees' original attendance records with attendance information grantees provided us. We found that our instrument was successful in eliciting accurate attendance records.

Our request for attendance data yielded a response rate of 93 percent (185 of 200). We designed our sample to produce an estimate of the total number of enrolled and underenrolled Head Start slots with an expected relative precision of 15 percent at the 95-percent confidence level, assuming a grantee response rate of 80 percent. Beyond the nine grantees that did not respond to our request, an additional six grantees did not comply with the data request because they either could not collect attendance records from all their delegate agencies or the effort of gathering all of their attendance data would have taken the grantees more time than the study allowed.

Another six grantees submitted a large volume of hard-copy attendance records. We determined that the task of reviewing these hard-copy records was significant and would have taken longer than the time allotted for the study. Because we designed our sample to obtain precise estimates with a grantee response rate as low as 80 percent and our response rate would be 90 percent (179 of 200) without including these six, we did not analyze attendance records for these six grantees. Thus, we reviewed attendance data for 90 percent (179 of 200) of sampled grantees.

To understand ACF regional offices' enforcement of full enrollment, we interviewed staff from all 11 regions. We asked regional offices about their definitions of underenrollment, the actions they took in response to grantees' failure to maintain full enrollment, and the number of grantees whose funding they reduced and/or froze during the 2006 program year because of the inability to maintain full enrollment.

Data Analysis

Estimating enrollment levels. For each grantee, we counted children as enrolled if they attended at least once within a given month. We could not determine whether a child whose first day of attendance was after the beginning of the month was filling a vacancy that had been open for more than 30 days. Also, because we counted each child who attended at least 1 day in the month as a separate enrolled slot, it is possible that we double-counted children who were filling the same slot. For example, if a child attended at the beginning of the month and then dropped out and another child filled that slot within 30 days, we would count them as filling two enrolled slots. This method produced a conservative count of enrolled children.

We used grantees' average attendance data over 3 sampled months to determine their actual levels of enrollment. We then compared the number of children actually enrolled to grantees' funded enrollment according to ACF. We projected from our sample to the population of Head Start grantees to estimate the proportion of fully enrolled grantees and the degree to which other grantees were enrolled. We also estimated enrollment levels nationwide and the total number of enrollment vacancies.

Comparing our estimates of enrollment levels with the PIR. The PIR requires that grantees report their enrollment for 3 specified months per year. To facilitate comparison between our enrollment data and the PIR, we chose two sampled months (November 2005 and April 2006) to

overlap with PIR reporting months. To assess accurate reporting of actual enrollment levels, we compared the 179 grantees' actual enrollment levels from our review to the actual enrollment levels they reported in the PIR for these 2 months.

Limitations

Although we requested that grantees provide data for ACF-funded children only and we pretested our instruments to ensure validity, some grantees may have incorrectly submitted attendance records for State-funded children.

State funding for Head Start services is still relatively uncommon. ACF headquarters staff reported that State-funded Head Start slots are proportionally few compared to ACF-funded Head Start slots. According to ACF, only 7 percent (14 of 200) of sampled grantees served State-funded children during the 2006 program year. In the event that some grantees included State-funded children in their attendance records, our enrollment level estimates would be conservative.

To reduce the possible effect of grantees reporting State-funded children along with ACF-funded children in their attendance records, we considered grantees whose actual enrollment was greater than ACF-funded enrollment to be fully enrolled and did not report the amount of overenrollment.

ESTIMATES AND CONFIDENCE INTERVALS

Table 6A: Estimates Discussed in Finding One: Almost All Head Start Grantees Had High Enrollment Levels

Estimate Description	Sample Size	Point Estimate	95-Percent Confidence Interval
Percentage of grantees at least 95-percent enrolled	179	81.5%	74.2%–88.9%
Overall percentage of Head Start slots unfilled	179	4.6%	2.9%–6.2%
Number of total unfilled Head Start slots	179	33,726	20,551–46,901
Percentage of grantees in the Hispanic strata at least 95-percent enrolled	68	91.0%	85.7%–96.3%
Percentage of grantees in the non-Hispanic strata at least 95-percent enrolled	111	79.7%	71.0%–88.4%
Percentage of grantees who reported changing their recruitment strategies because of an increase in the Hispanic population in their service area	111	79.7%	70.2%–89.2%

Source: Office of Inspector General analysis of grantee attendance records, 2006.

Table 6B: Estimates in Table 3 of Finding One: Almost All Head Start Grantees Had High Enrollment Levels

Enrollment Levels	Percentage of Grantees 95-Percent Confidence Interval		
	All Grantees (n = 179)	Grantees in Hispanic-Growth Areas (n = 68)	Grantees Not in Hispanic-Growth Areas (n = 111)
100%	40.2% (30.8%–49.6%)	41.0% (30.6%–51.4%)	40.1% (29.1%–51.1%)
≥ 95% and < 100%	41.3% (32.1%–50.6%)	50.1% (39.6%–60.6%)	39.6% (28.8%–50.5%)
≥ 90% and < 95%	9.8% (4.1%–15.5%)	2.6% (0.9%–7.2%)	11.2% (4.4%–18.0%)
< 90%	8.7% (3.4%–13.9%)	6.4% (1.7%–11.0%)	9.1% (2.9%–15.3%)

Source: Office of Inspector General analysis of grantee attendance records, 2006.

Table 7: Estimates Discussed in Finding Two: Grantees Cited Common Challenges To Maintaining Full Enrollment			
Estimate Description	**Sample Size**	**Point Estimate**	**95-Percent Confidence Interval**
Percentage of grantees that reported difficulty maintaining full enrollment	189	54.7%	45.6%–63.9%
Percentage of grantees at least 95-percent enrolled that expressed difficulty maintaining full enrollment	144	48.9%	38.4%–59.4%
Of the 55 percent of grantees that reported difficulty maintaining full enrollment, the percentage that cited low-income requirements as a challenge	106	71.2%	60.2%–82.1%
Of the 55 percent of grantees that reported difficulty maintaining full enrollment, the percentage that cited population shifts/declines as a challenge	106	41.3%	29.0%–53.7%
Of the 55 percent of grantees that reported difficulty maintaining full enrollment, the percentage that stated that they could better maintain full enrollment if ACF increased the income thresholds or permitted grantees to serve a greater number of families above the stated income guidelines	106	26.0%	15.2%–36.8%
Of the 55 percent of grantees that reported difficulty maintaining full enrollment, the percentage that cited competition with State programs as a challenge	106	49.5%	37.0%–62.0%
Of the 55 percent of grantees that reported difficulty maintaining full enrollment, the percentage that cited transportation issues as a challenge	106	45.8%	33.3%–58.2%

Source: Office of Inspector General analysis of grantee surveys, 2006.

Table 8: Estimates Discussed in Finding Three: ACF's Monitoring of Enrollment Levels May Rely on Inaccurate Data

Estimate Description	Sample Size	Point Estimate	95-Percent Confidence Interval
Percentage of grantees that reported actual enrollment levels that matched those we determined based on our review of attendance records	175	11.2%	4.8%–17.6%
Percentage of grantees that misreported actual enrollment levels	175	88.8%	82.4%–95.2%
Percentage of grantees that overreported actual enrollment levels	175	69.4%	60.7%–78.1%
Percentage of grantees that underreported actual enrollment levels	175	19.4%	12.3%–26.5%
Net number of children misreported	159	38,587	22,802–54,373
Percentage of grantees that misreported actual enrollment levels by more than 50 children	175	19.6%	12.3%–27.0%
Percentage of misreporting accounted for by the 20 percent of grantees that misreported by more than 50 children	159	87.8%	80.8%–94.7%
Percentage of grantees that reported receiving any enrollment-related training from their regional offices	189	5.7%	0.9%–10.5%
Percentage of grantees for which we had significant concerns about their ability to produce accurate attendance counts	191	26.2%	17.9%–34.4%
Percentage of grantees that provided records for all children they served in a given month compiled into a single file or list or used systems capable of producing such reports	191	73.8%	65.6%–82.1%
Percentage of grantees that submitted attendance data separately by classroom or delegate agency and did not appear to have systems capable of compiling accurate attendance lists	191	21.7%	14.0%–29.4%
Percentage of grantees that could not provide us with completed attendance data because they could not collect attendance records from all their delegate agencies or the task of gathering attendance data would have taken longer than the study allowed	191	4.5%	0.3%–8.6%

Source: Office of Inspector General analysis of grantee surveys and attendance records, 2006.

AGENCY COMMENTS

DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
Office of the Assistant Secretary, Suite 600
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

APR 1 8 2007

TO: Daniel R. Levinson
            Inspector General

FROM: Daniel C. Schneider
            Acting Assistant Secretary
               for Children and Families

SUBJECT: Office of Inspector General Draft Report titled, "Enrollment Levels in
            Head Start," OEI-05-06-00250"

Attached are the Administration for Children and Families' comments on the above-
referenced draft report.

Should you have questions, please contact Channell Wilkins, Director, Office of Head
Start, at 202-205-8573.

Attachment

**COMMENTS OF THE ADMINISTRATION FOR CHILDREN AND FAMILIES
ON THE OFFICE OF INSPECTOR GENERAL'S DRAFT REPORT TITLED,
"ENROLLMENT LEVELS IN HEAD START" OEI-05-06-00250**

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

We found relatively high levels of enrollment among Head Start grantees. In fact, 81 percent of grantees were at least 95-percent enrolled in the 2006 program year. Despite high enrollment, more than half of grantees reported challenges to maintaining full enrollment. In addition, we found continued inaccuracies in the data used to monitor enrollment. Finally, we found that although ACF enforcement of full enrollment had increased, enforcement varied by region.

Based on the results of our review, ACF should:

Address Grantee Challenges to Maintaining Full Enrollment

ACF should focus particular attention on the challenges identified in this report: specifically, the requirement that grantees fill 90 percent of slots with children from very low-income families, competition with State and locally funded prekindergarten programs, and transportation issues.

- To address concerns regarding the requirement that grantees fill 90 percent of slots with children from very low-income families, ACF could amend its regulations to increase the allowable percentage of eligible families that exceed the income guidelines or assist grantees in identifying and recruiting categorically eligible families, i.e., those receiving TANF or SSI or those with foster children. Although we recognize that there are statutory and regulatory limitations to changing the Head Start income requirements, ACF might also reassess the income guidelines based on minimum wage increases and other factors.

- To address concerns about competition with State and locally funded prekindergarten programs, ACF could work with grantees to increase coordination with these programs. Increased coordination could help ensure that States make information available to parents about Head Start programs to facilitate choice for parents.

- To address concerns regarding transportation, ACF could provide technical assistance to grantees regarding transportation resources.

Ensure That Enrollment Data Are Accurate

To help ensure the accuracy of reported enrollment data, ACF should:

- Work with grantees to maintain accurate attendance records. To facilitate this, ACF could encourage the use of electronic attendance records.
- Provide PIR training to grantees.
- Fill in the grantee's funded enrollment field in PIR. Since ACF establishes the funded enrollment level, there is no need to ask grantees to report this. This allows for an unnecessary source of reporting error.

Issue Guidance Concerning the Use of Funding Reductions for Grantees Not at Full Enrollment

To ensure consistent enforcement of the full enrollment requirement, ACF should:

- clarify guidelines to regional offices concerning the level of enrollment that warrants a funding reduction, and

- issue guidance to regional offices concerning the calculation of funding reductions and the process of negotiating funding reductions with grantees.

<u>ACF Comments</u>

The recommendation regarding ACF reassessing the "…income guidelines based on minimum wage increases…" is not within the ACF Office of Head Start's (OHS) purview. The poverty guidelines are issued annually in the *Federal Register* by the Secretary of HHS and are used as an eligibility criterion by many programs across multiple Federal agencies. Additionally, ACF does not support the recommendation that ACF amend the Head Start regulations to increase the number of children from families not meeting Head Start's current eligibility requirements. Such a change would allow local programs to enroll higher-income children before ensuring that all of the neediest children are afforded an opportunity to participate in the Head Start program. ACF would like to further consider the recommendation to provide training to grantees on the Program Information Report (PIR). ACF supports the remaining recommendations and will explore appropriate ways to implement them.

➤ 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 Komaniecki, Deputy Regional Inspector General.

This report was led by Emily Melnick and Anne Bracken. Other principal Office of Evaluation and Inspections staff who contributed include Kevin Farber, Alan Levine, Tamara Perry, Louise Schoggen, Elise Stein, Rosaella Washington, and Mara Werner.