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ABSTRACT

This report describes the first Public Policy Seminar, sponsored by the Black Child Development Institute in the summer of 1972. The seminar was designed to provide the opportunity for information-sharing, awareness of federal policy making, and a channel for minorities involved in child development at the community level to exert pressure and provide input in decision-making at the national level. The representatives of organizations involved in community-based, community-controlled black child development centers, and the black professionals from related fields taking part in the seminar, discussed the issues relating to early child development and education raised by the child care provisions of HR-1, the Federal Requirements for Day Care, the Child Development Associates Program, and the Head Start Enrichment Program. The booklet contains an overview of federal legislation relating to child care and the participants' recommendations to the Acting Director of the Office of the Child Development. (CS)

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Preface

The Black Child Development Institute (BCDI) is the only Black, independent, non-profit agency established at the national level to improve the quality of life for Black children. BCDI operates out of a belief that curriculum and program content should enhance a Black child's sense of racial awareness and ethnic pride. The Institute believes that minorities must be involved in setting policies regarding child care/child development programming. BCDI believes that child development activities and child development centers can be a catalyst for total community development.

While community organizations work hard to meet the child development needs in their locales, their efforts are often counteracted at the national level. While federal agencies give lip-service to community involvement and participation, they continue to formulate policies and programs without involving any knowledgeable and experienced community persons in the process of decision-making which will affect the life of communities everywhere in the nation.

The Public Policy Seminars are an attempt to make community persons aware of such Federal government policies and programs before they have become solidified, and they are

also an effort to make the policy-makers and the program-designers understand that they cannot continue to ignore the population they are supposed to serve as they formulate directions in child development for the next ten or twenty years. The Seminars provide a meeting ground for federal officials and concerned professionals and community persons involved in child development. A major premise of the Public Policy Seminars is that once the community persons are informed of activities going on at the federal level, they can exercise pressure to insure accountability on the part of the responsible government agencies, for example, the Office of Child Development (OCD), and they can demand involvement in the process of design and decision-making, because they have valuable input to make and ought not to be ignored.

BCDI sponsored its first Public Policy Seminar from a Black Perspective in the summer of 1972. The Seminar brought together from all over the country representatives of organizations involved in community based, community controlled Black child development centers, and Black professionals from related fields. The participants in the Seminar discussed issues relating to early childhood development and education raised by the child care provisions of HR-1, the Federal Requirements for Day Care, the Child Development Associates Program, and the Head Start Enrichment Program. Participants in the Seminar drafted policy recommendations relating to those programs and presented the recommendations to Acting Director Saul Rosoff of the Office of Child Development, and four of his chief executives.

The following pages report on the immediate outcome of the first Seminar, showing the position taken by the participants on the issues named above. The real outcome of the Seminar in information-sharing, awareness of federal policy-making and program designing decisions, and potential for follow-up on the part of participants, cannot be measured or reported on here.

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The Congress and Child Care

By

**Mr. Gordon G. Alexander
Special Assistant to Senator Birch Bayh**

The first Public Policy Seminar began with an overview of current Federal legislation relating to child care.

BASIC FACTS BEFORE THE CONGRESS

Head Start program, although enormously successful, has reached only 10% of the impoverished preschool children who are eligible for it.

One-third of the mothers with preschool children—a total over 4-1/2 million women, are working at full or part time jobs today. As a result, there are over 5 million preschool children who need full or part time day care services while their mothers are away from home. Yet, there are less than 700,000 spaces in licensed day care programs.

The President's 1970 White House Conference on Children delegates voted as their first priority the provision of "comprehensive family-oriented child development programs including health services, day care and early children education."

- In 1971, 43% of the Nation's mothers worked outside the home compared to only 18% in 1948.
- One out of every three mothers with preschool children is working today, compared to one out of eight in 1948.
- In 1971, 1.3 million mothers of children under 6 were single parents bringing up children without a husband, and half of these mothers worked.
- Yet, again there are fewer than 700,000 spaces in licensed day care centers to serve the other 5 million preschool children whose mothers work.

Only about 20% of these day care programs are developmental, or comprehensive. A recent OEO publication entitled "Day Care: Resources for Decisions," concluded: Over 90% of all full-day centers in the United States are privately operated for profit.

Most are custodial programs because that's all that most working mothers can afford—Day Care in America is a scattered phenomenon; largely private, cursorily supervised, growing and shrinking in response to national adult crises, largely unrelated to children's needs.

Additionally it is estimated that there are 2.4 million preschool children in the United States who are seriously handicapped.

ISSUES UNDER DISCUSSION

Extent of parental participation, funding level, State involvement, requirements for prime sponsorship, standards, and universal care have been proposed and debated thoroughly in the House and Senate.

Advocates of greatly increased parent participation argue that programs cannot be truly responsive to the needs of children without full participation by, and accountability to, parents. From a Black perspective these factors are crucial. On the other hand traditional purveyors of child care services fear severe compromise of the relative autonomy they have enjoyed.

The most liberal funding levels proposed fall far short of the fifteen to twenty billion dollars annually required to provide quality universal developmental care for American children. Commitment of adequate funds would cut through the double-talk about reordering national priorities and show positive action.

States have been seriously opposed to any proposed child care legislation which would have the effect of limiting their authority in the planning, application, sponsorship, and monitoring of child care programs. Historically, local groups have been frustrated often by the insensitivity and bureaucratic intransigence of many State officials. Additionally, State and

local officials understand clearly that people organize very readily around issues which affect their children. The political implications of this are disturbing to them as reflected by their opposition to maximum parental participation, community program control, and elimination of State veto power over program funding and administration.

Licensing provisions and standards for program operation vary by State. They often prevent development of programs in communities whose limited facilities such as store fronts and church basements fall short of prevailing requirements. Those concerned most with meeting the needs of children have argued for modification of licensing requirements and the adoption of standards which focus on quality of child care and development and not limited to fire and safety regulations.

CHILD CARE ACTION SINCE NIXON VETO

On December 9, 1971 President Nixon vetoed S.2007, the three year extension of the Economic Opportunity Act of 1965. The vetoed bill:

- Authorized a new system of Comprehensive Child Development Centers with strong community participation. Prime sponsors would contract directly with HEW's Office of Child Development.
- Authorized \$500 million in fiscal '72 to continue Head Start, plus \$100 million to plan new child development centers. For fiscal 1973, a combined authorization of \$2 billion for Head Start and child development centers.
- Authorized free services for children of families with \$4,320 income or below. Families with incomes between \$4,320 and \$5,916 would pay a fee of 10 percent of the income *over* \$4,320 (e.g., \$159.60 fee at \$5,916 income level). Between \$5,916 and \$6,960, fees would be \$159.60 plus 15 percent of income over \$5,916 (e.g., \$416.20 at \$6,960). The HEW Secretary would set fee schedules for incomes over \$6,960.

A FEW QUOTES FROM NIXON'S VETO STATEMENT

"... the fiscal irresponsibility, administrative unworkability and family weakening implications of the system it envisions."

"... For the Federal Government to plunge ahead financially into supporting child development would commit the vast moral authority of the national government to the side of communal approaches to child rearing over against the family-centered approach."

"... Our HR-1 welfare reform proposals, which have been before the Congress for the past 26 months, include a request for \$750 million annually in day care funds for welfare recipients and the working poor, including \$50 million for construction of facilities."

"... The child development envisioned in this legislation would be truly a long leap into the dark for the United States Government and the American people."

"... The States would be relegated to an insignificant role."

SUBSEQUENT SENATE ACTION

Following the veto, Child Care was split off from the Economic Opportunity Act and reported on May 16, 1972 by the Labor and Public Welfare Committee as a separate bill. This bill, S.3617, was titled the Headstart Child Development and Family Services Act of 1972—often referred to as the Nelson, Mondale, Javits bill.

S.3617 passed the Senate 73-12 Tuesday, June 20. As passed, the bill differs from the pre-veto version in three significant ways:

- ***Prime Sponsorship***

The committee bill gave preference over States for prime sponsorship to localities if they had populations of 25,000 or greater and were capable of developing and administering a program.

The bill as amended retains the 25,000 or over population requirement but requires also that a local prime

sponsor must prove it can be more effective than the State in program development and administration. HEW Secretary Richardson has testified that in his opinion, States and municipalities with over 500,000 population are the best qualified to develop and administer comprehensive programs for child care and development.

The effect of this amendment will be to greatly reduce opportunity for communities with less than 500,000 population to qualify as prime sponsors since the HEW Secretary has discretionary authority in final approval of prime sponsorship applications. It will also foster bureaucratic remoteness, complexity and insensitivity in addition to broad participation by State welfare departments.

- ***Local Parental Participation***

The committee bill requires local Program Councils and Project Policy Councils to be 50% parents of children served. This gave parents in effect a veto power over programs not meeting their needs.

The bill as amended by Senator Dominick removes that veto power by requiring that programs not approved in 30 days after admission to the councils will automatically go into effect. The effect is to reduce parental leverage rather drastically.

- ***Money***

The \$500 million for Headstart and \$150 million for fiscal year '73 planning, training and technical assistance are in line with the pre-veto bill. However, the authorization of \$1.2 billion for fiscal year '74 and \$1.6 billion for fiscal year '75 is significantly less than the pre-veto measure.

The bill will be opposed in the House as still being too liberal and prospect of passage by the Congress at this point does not look good. Moreover, a second veto is still possible.

Seminar Statement on the Philosophy of the Office of Child Development

Many of the criticisms and recommendations for change that can be aimed at such programs as Head Start Enrichment, Child Development Associates Program, HR-1, and the new Federal Requirements for Day Care are the result of the basic philosophy which underlies these programs and which shapes the form they take. Participants in the Seminar agreed that the reason programs coming out of the Office of Child Development were unacceptable to them was that the basic philosophy of OCD differed from theirs. Thus the Seminar began with a discussion of what the basic OCD philosophy should be.

INTRODUCTION

We believe that the developmental years of life are crucial to the maturation of children. Life stresses placed on families in this society have raised the need for comprehensive child care to an extremely high level. We believe this is a legitimate concern of Government. The most appropriate unit of Government to relate to this concern is the Office of Child Development, at the Department of Health, Education, and Welfare.

PHILOSOPHY

The Office of Child Development should exist to insure that quality comprehensive development programs are provided to all children who need them. The fulfillment of this responsibility *requires* that OCD recognize and act on the multiple aspects of its task:

1. To be, first and foremost, the advocate for children within the Administration, before Congress, and before the American people;
2. To serve as the central source to which people trying to serve children can come for knowledge about meeting children's needs, for technical assistance, standard-setting and for funding;

3. To assume sole responsibility within the Federal Government for establishing and monitoring quality comprehensive developmental services to children from the pre-natal period until a child reaches the age of 18 years;
4. To view and serve the child in the context of his family and community, recognizing the fact that meeting the needs of the child necessitates meeting related needs of his family, and respecting and capitalizing on the strength of his family structure and the concern of his parents
5. To stimulate the development of research which will analyze and meet Black children's needs and establish funding for such programs.

The Seminar went on to make specific recommendations for the improvement of all OCD programs, including the four programs under special consideration on this occasion:

1. Funding

Use of available funds must be tailored to fit quality child development programs rather than vice versa. The far-reaching social and economic consequences of child development and day care make this a common sense rule of thumb. Since the level of current funding does not come anywhere near to meeting current needs, this Black Seminar recommends that wise use of available funds necessitates allocating a minimum percentage of monies to administration and a maximum percentage of monies to program.

2. Determination of Policy

The responsibility of parents for their children has been firmly established both by custom and by law. Therefore it follows that the right of parents to be involved in the development and education of their children must be recognized.

The expertise that parents can bring to child development program must be respected. The increased success and impact on the child when his parents support and supplement a program must also be recognized. In light of these facts, the Black Seminar recommends:

- a. That OCD have a National Policy Council composed of representatives of whom a majority are consumers of services with ethnic representation in keeping with the clientele served. The National Policy Council should have no less than 20 members.
- b. That OCD Regional Offices have Regional Policy Councils composed of representatives of whom a majority are consumers of services with ethnic representation in keeping with the clientele served.

3. *Research and Program Development*

It seems to us that OCD programming and implementation based on the experience, research and recommendations of white academicians, researchers and consultants has resulted in programs that do not capitalize on the strengths of minority families and communities (e.g., the deficiency model). These programs can do actual harm to children by exposing them to conditions that are inconsistent with realities of their lives.

OCD needs to avoid these errors by:

- a. funding Black and other minority researchers and consultants;
- b. incorporating the recommendations of such minority persons into OCD's policies and programs;
- c. supporting the development of curriculum that relates to a child's ethnic background and life experiences;
- d. meeting the urgent need for the construction of tests and measurements relevant to Black and other minority children.

OCD must earmark and spend a certain percentage of research monies in the support of Black and other minority researchers and consulting groups (as is done in the 8A funding program in the Department of Commerce).

4. *Staffing*

OCD staffing must include Black and other minority professionals at decision-making levels. Such staffing should be proportional to the ethnic composition of the population served by OCD programs.

Findings of the Seminar

Critical Issues for Child Care in HR-1

In vetoing the bill which authorized a new system of comprehensive child development, President Nixon stated that "Our HR-1 welfare reform proposals, which have been before the Congress for the past 26 months, include a request for \$750 million annually in day care funds for welfare recipients and the working poor, including \$50 million for construction of facilities." Since the administration clearly sees HR-1 as the only acceptable vehicle for child development activity, it is important for those concerned with quality child development programs to formalize their position in relation to the proposals of HR-1.

The participants in the Seminar noted that HR-1 consistently sets up conditions that work against community involvement in child development in any decision-making capacity and that put obstacles in the way of a non-profit, community-operated child development center.

PRIME SPONSORSHIP

The first area of concern is the concept of "prime sponsorship" and the large population areas prime sponsors are to serve, according to the provisions of HR-1. No area with a population less than 500,000 is eligible as a prime sponsor. By definition, according to Secretary Richardson, "prime sponsors would be State governments, large city general purpose government, or federally-recognized Indian Tribal organizations." The fact that the state government is the agency through which centers must move to gain the provisions of HR-1, poses a serious obstacle for non-profit, community operated day care centers.

The Public Policy Seminar participants recommended that population groupings should be no more than 25,000 with guaranteed options for participation by users of the services. For purposes of prime sponsorship the 25,000 population groupings could be a geographical community, an organization serving 25,000 people without regard to geographical boundaries, or an agency of state or local government which has a history of equitable treatment of minorities and has shown sensitivity to the needs of children. Technical assistance should be provided to prime sponsors who are not agencies of the government.

CHILD DEVELOPMENT COUNCIL

An important appendage of the prime sponsor under HR-1 will be the Child Development Council. This Council, along with the agency responsible for program operation, will develop a plan for child development services in that area. Thus, the make up of that council becomes critical in the operation of relevant child development programs. The guidelines for HR-1 recommend that the Council be at least 25% parents. The participants of the Public Policy Seminar took the position that no less than 60% of the Council should be parents of children in the program.

The Seminar participants recommendations resulted from their basic philosophy that people should have direct input into

the decisions that affect their lives and the lives of their children. Moreover, the Child Development Council will have the important tasks of: reviewing individual grant applications; acting as a hearing board to consider complaints and recommendations of parents, operators, agencies, and participating in quality control and program evaluation efforts. Seminar participants felt that in order to live up to its responsibilities, the Council has to be made up of people whose priorities are children and not bureaucracy.

The participants stated that the establishment of the child development council should be the first action of the designated prime sponsor. The Council should be policy-making rather than advisory and should exist in two forms:

- a. A national Child Development Council which would assist the Office of Child Development in implementing its function as the major agency of government responsible for concerns related to children;
- b. At the State and local level, the Child Development Council should have input, review and approval powers in relation to State plans and proposals. The CDC should be the management board of the prime sponsor, employing staff and setting policy at the state and local level.

Where possible the process of election for the Child Development Council at the local and/or state level should be elective rather than appointive. The Seminar participants suggested terms of three years, with 1/3 of the board rotating on a yearly basis.

OTHER AREAS OF CONCERN

Under the provisions of HR-1, in those instances where the prime sponsorship mechanism is inoperative, HEW may make direct grants to child development centers. The Seminar foresaw that it might be necessary, given the intractability of some state and municipal governments, to make direct grants a permanent feature of the mechanism by which centers can acquire the necessary resources for operation.

According to a statement issued by the Office of Child Development and the Department of Labor, private enterprise would be encouraged to expand its efforts in the direction of development of child care programs. It is not stated what form this encouragement would take and the Seminar took the position that the Federal Government should not subsidize the efforts of private industry in initiating child care programs but rather the efforts that private enterprise makes in this area should be handled, financially, by these industries themselves. It would be a dangerous precedent for government to rely upon the efforts of the private, for-profit sector to provide day care in areas where the government had primary responsibility.

It is the responsibility of the chief elected public official (governor or mayor) to designate an administering agency for HR-1, and this agency may be either public or a private, non-profit agency whose primary concern is children. In either case, the Seminar felt that the appointed agency must be one that has a history of having dealt with Black and other minority groups in an equitable and principled fashion. As a matter of fact, the selection of this agency ought not to rest solely in the hands of the chief elected official but should be a collective decision of the community in which the agency operates. The community is in a very good position to know the history of each agency and can speak to the question of which agency is better equipped to handle the administering of the program for child care.

Under the provisions of HR-1, prime sponsors will be granted funds for resource creation and these funds will be utilized for making grants to existing centers and also potential centers. The funds can be used to establish new facilities and to improve and expand existing facilities. The use of funds for the construction of new facilities is a new and important feature of child care legislation. The Seminar noted that the lack of adequate facilities has been the roadblock in many a community's way toward the establishing of a much needed day care center. It is stated that grants and contracts will be used to cover operating costs for "an initial, limited period of time." The Seminar cautioned that this period of time must be long enough to allow a center to develop an effective delivery system.

CONCLUSIONS

The participants made it clear that, although they had addressed themselves only to certain provisions in HR-1, this was not an indication that they accepted the other provisions without reservation. They tried to suggest some alternatives to allow for maximum community input. They pointed out that the philosophical foundation of HR-1 is custodial day care rather than developmental child care. It is custodial because of its major objective being to decrease the number of people on welfare, rather than to provide quality developmental programs for children.

The Seminar concluded that the Office of Child Development had failed in its responsibility of child advocacy when it endorsed HR-1 and the child care provisions of HR-1. Thus the participants went on record as severely censuring the Office of Child Development for its action in giving testimony that aided the passage of HR-1.

TASK FORCE MEMBERS

John Buffington, *Chairman*

Canary Girardeau

Freida Mitchell

Jean Hicks

Rosa Porter

Charline Hopkins

Odessa Sayles

Edmond Jones

Donald Stone

Mary Washington

Federal Requirements for Day Care

The need for major comprehensive child care services in this country has been repeatedly observed, articulated and documented. The comprehensive child care bill which was vetoed at the Executive level contained most of the elements for the beginning of a national commitment to young children and their parents. The veto of that bill makes it necessary to wage the fight again to insure that quality services are available to all children, and to make known that anything less is unacceptable.

In this context, Seminar participants discussed and analyzed the new draft of the Federal Requirements for Day Care (Draft—April, 1972). Since the document had not yet become national policy, participants carried on critical analysis in the hope of impacting the final version.

Participants found that the 1972 requirements are inadequate in major areas. These requirements represent the standards of the Federal Government for child care, and

compliance with these standards will be mandatory if federal funds are to be received for programs, yet participants concluded that this document in fact represents a move toward custodial care for children whose parents are out of the home. Participants were convinced that the standards must insure that children receive more than a "minimum" for their development.

The draft requirements suggest that the trend in the provision of day care service is away from the center day care concept and toward family day care serving up to twelve children.

Most of the participants in the Seminar had experience with day care centers that served as focal points for community development. They questioned whether family day care had the same capacity for comprehensive child development, and feared that family day care could much more easily become custodial in nature. They preferred to consider provisions for a network of family day care homes in a satellite relationship to a child development center, as they were anxious to continue to promote quality comprehensive child care. The child development center could provide developmental and supportive services to its satellite family day care homes, thus helping care givers in these homes to improve their services to children. Under such a system, development of the child and of his community as a whole could still be fostered.

THE ROLE OF PARENTS

Participants reiterated that the critical issue in any program for children is the role of parents. The draft regulations relegate parents to an advisory role. The Administering Agency would have a policy advisory group which includes parents of enrolled children, but there is no designated minimum percentage for parent representation on this group. All centers with fifteen or more children must have policy advisory councils at the center level with a minimum of 50% parent representation. There is no specified process for selection at either of these levels. It is also unclear how the two Advisory groups would relate to each other.

Participants stated that the boards should be policy boards, rather than serve in an advisory capacity. Further, the boards should be 51% parents, and that parents of children served should be elected by other parents to be members of the policy board. Such parents should be given the necessary information, structure, and staff support to determine policies, goals and procedures of the child care programs in which their children are enrolled. The draft requirements only state that, upon request, information is provided to parents on administering agency policies, budgets, and evaluations. Participants felt that the understanding of policy and practice is a necessary part of the decision-making process and allows the parent to make sound decisions and choices about day care in relation to the needs of the children and their parents.

STAFFING

Ratios and qualifications for staff are described in Sections I-K and II-L of the draft document. Clearly, these requirements are inadequate in terms of staffing patterns and qualifications for personnel. These issues are very much related as indicators of the federal direction toward custodial care. For example, the staff-child ratio for the 3-6 year old pre-school child is 1:9. This represents almost double the number of children in that age group per adult as specified by the 1968 requirements. Participants recommended the following staff-child ratios:

- 1:2 infants age 0-24 months
- 1:3 toddlers age 25-35 months
- 1:5 pre school children age 3- enrollment in 1st grade
- 1:10 school age children first grade through age 11
- 1:15 school age children age 12 through 14 years

In the draft requirements dealing with personnel or caregivers there is no requirement for formal education, experience, and training in child development for either professional or paraprofessional staff. Administering agencies are given responsibility for the training of caregivers, but there are no specific requirements guiding the content of this training and

the form of training. Participants recommended that a comprehensive career development plan, including pre-service and in-service training be required before a program can be funded

PROGRAM CONTENT

Program content for children is vague and although general recommendations are made in terms of the need for planned activities appropriate to the age of the child, program areas of the requirements could be strengthened. The required written plan of daily activities does not in and of itself assure an appropriate educational emphasis. Participants insisted that all programs and curricula should reflect the cultural background of the children served.

While there are provisions for health services and to some extent for social services, this draft tends to focus on the use of existing services which are generally inadequate. The child development program should serve as a catalyst for improvement in the delivery of services, not simply as a referral source. Participants felt that psychological services should be part of the health and related services, and that specific health services should be defined. They wanted specific social services to be part of the document.

CONCLUSION

Generally, the participants recommended re-definition of the basic terms of the document. This re-definition would be in accord with the philosophy of parent-controlled, quality child development, as opposed to custodial, parent/advisory capacity, care. Throughout the discussion participants voiced their concern that the draft Federal Requirements would only foster

Due to space limitations the detailed line-by-line changes and additions to the Requirements proposed by the Seminar cannot be presented here. Copies are available upon request from BCDI.

inadequate custodial surveillance of children, and thus would hinder the provision of quality developmental services for children.

TASK FORCE MEMBERS

Frank Williams, *Chairman*

Catherine Boddie

Mary Jane Roy

Edith Key

Florence Stroud

Clarice Walker

Head Start Enrichment

After a review of Head Start, OCD stated:

We have found considerable variation in local performance, with many Head Start programs needing substantial improvement. We are aware of practices that, in the light of experience, no longer make sense; we have discovered ways of serving more children with the same resources and without sacrificing valued benefits; and we see some variations on the traditional Head Start program design which are potentially more beneficial to children than what has been done in the past.

These conclusions led OCD to undertake a Head Start Enrichment Program. Specifically, this program is intended to serve more children, using the same resources and "moving away from the standard, center-based, five-day week Head Start model." OCD plans an intensified experimental approach, but all the experimental efforts seem to be aimed at serving more

children without having to increase federal funding. New funds are not mentioned; cost savings and increased efficiency are stressed.

The Seminar spoke both to the issues underlying Head Start Enrichment and to its specific proposed program changes.

We believe it is the right of all children to have an opportunity for optimum growth and development. Thousands of low-income children have been deprived of this opportunity. Consequently, their developmental growth has been obstructed because some of their basic human needs have not been met.

The basic concept and intent of the Head Start Program was to offer these children quality comprehensive services that would meet their physical, emotional, educational, and social needs. It appeared that, at long last, the government had made an initial commitment to provide quality services to the nation's children. The Head Start Program was testimony to that commitment.

Now it would seem, as indicated in the revised Head Start Program, that government is no longer willing to honor this commitment to these children. The overall impression and major thrust conveyed in the proposed revised program is to sacrifice quality services in order to cut cost.

We can appreciate the need to remove features of the program that have been found to be ineffective or not serving the basic needs of these children. However, we firmly reject any measures that would place cost savings before the needs and interest of these children. After a careful study and analysis of the proposed Head Start Enrichment program, we find that it has been designed primarily to save money—not to serve children.

EVALUATION AND THE MONITORING STUDIES

Head Start parents, operators, and other community participants are anxious to work out and implement improved ways of serving the children in their programs. Evaluation is an

important part of any program for improvement, but any evaluation which is to support major changes in a national program of the scope and importance of Head Start, must meet the following criteria:

1. Respect the authority of parents and utilize their expertise and concern for their children; including parents at all decision-making levels of planning and implementation;
2. Capitalize on the experience and knowledge of Head Start operators and personnel at the local level;
3. Be consistent with common rules of data collection and analysis to insure reliable data, comparable across community and regional lines.

It is the understanding of this Seminar that the major revisions proposed by Head Start Enrichment are based on monitoring studies conducted during the past twelve months by contracted consulting firms. The Seminar categorically rejects these monitoring reports as validation of Head Start Enrichment, because these reports fail to meet any of the three criteria listed above. Specifically:

1. A review of these monitoring studies revealed that site visitation teams were consistently composed of public officials and academicians. There is no evidence that parents of children in Head Start were consistently represented on the teams. The Seminar asks: When were parents included in the formulation of the study design, implementation, and analysis?
2. The Seminar sees local Head Start personnel as having been similarly excluded from playing a meaningful role in the monitoring studies. Head Start operators became, for all intents and purposes, the *subjects* of the study.
3. The design and implementation of the studies violated basic rules of reliable, consistent data collection. In essence, the studies consist of different people describing different programs in different ways. There is no indication of any statistical analysis or summary of the studies; each person must read the voluminous materials and reach his own conclusions.

The Seminar totally rejects the process followed by OCD during its evaluation of Head Start and its design of Head Start Enrichment because it violates the tenets of the philosophy previously presented by the Seminar, namely that parents and community people must be included at all levels of decision-making that affect children, that programs for minority children must be based on research and analysis by minority researchers—and that quality cannot be sacrificed for the sake of cutting costs.

In addition, the Seminar stresses that the OCD evaluation and redesign of Head Start cannot even stand on the grounds of efficiency, since the conclusions reached—and therefore the proposals put forward—are inconsistent with the realities of Head Start programming. Specifically, Head Start Enrichment attributes the desirability of half day programs to younger children's inability to absorb developmental learning over extended periods of time. No evidence is presented to show that Head Start programs have not taken individual learning schedules into account when structuring their daily activities; on the contrary, comprehensive child development expands to meet the variety and pacing of a child's daily activities. In fact, the need for physical, emotional, educational, and social needs of many children cannot be effectively dealt with in one/half day programs. We do not dispute the point that some children may not require full day programs five days a week; we do insist that many children do need such programs. Only the local Head Start center and the parents involved have the information available to determine which scheduling best meets the needs of the individual child. The Seminar feels that Head Start Enrichment's stress on cutting back to half-day short week programming is not based on concern for the development of individual children, but rather springs from a desire to cut costs and move into family home day care at the expense of comprehensive child development centers.

Another conclusion with which the Seminar takes exception is that attendance trends indicate the desirability of a 10 month over 12 month year for Head Start operations. There is no overwhelming support for this conclusion in the monitoring data. The experience of Head Start personnel leads to the

conclusion that the major reason why many Head Start programs have opted for 10 month operating years has been simple lack of funds to continue operations for 12 months. Just one problem created by the 10 month, or part-time, program is the number of well-trained, able staff who are lost to Head Start programs because they cannot afford part-time employment.

A third example of the unworkable results which come from a faulty process is the projected datelines for implementation of Head Start Enrichment. This schedule is unrealistic and is typical of the errors in reasoning and planning when persons on the local scene are not included in policy and implementation considerations.

RECOMMENDATIONS

Head Start parents, operators, and other interested community people generally agree with the goals that Head Start Enrichment purports to strive for: recognizing the individual needs of children, giving a more prominent role to parents, and making child development services available to more children. Nevertheless, the process that OCD used to evolve the Head Start Enrichment proposal is still unacceptable, since it did not systematically include input from Head Start parents, operators, and other interested community people at all levels and in all phases of the development of Head Start Enrichment.

OCD should have convened state, regional, and national meetings of the above-listed Head Start participants for discussion, analysis, and recommendations regarding this new approach to meeting the needs of children. Such meetings would have clearly documented OCD's efforts to include these groups in a meaningful manner.

The lesson to be learned from the Head Start Enrichment experience is that OCD should hold periodic open meetings with parents, operators, and interested community people. These meetings should cover all Head Start components and should seek to acquire all relevant information concerning particular Head Start operations, problems, innovations, and so on. The format of these meetings must not include only presentations by

OCD staff and officials but must instead be aimed primarily at providing a mechanism for communicating information, ideas, and suggestions for change from the community level to the national level.

Had such meetings been held as part of the development of Head Start Enrichment, the following recommendations would have probably emerged:

- *Funding*

Present Head Start funds are barely adequate to maintain present full-day and year-around program operations. It is therefore impossible to mount new experimental programs at the same funding level without sacrificing developmental child care services. Under no circumstances can we support new projects designed mainly for cost savings. We recognize that these programs would in fact be nothing more than custodial warehouses for Black children.

- *Scheduling*

Until valid evidence can be cited to support half-day and shorter year programs, it is recommended that present Head Start funds continue to be used to maintain and improve present full-day, year around programs.

- *Research and Experimentation*

Like many other federal programs designed to serve children, the initiation of Head Start was based on research and recommendations of predominantly white researchers, who based their theories on a deficit model which sprang from the basic assumption that Black and other minority children suffer from a number of ills as a result of "environmental deprivation." Any program based on this deficit model fails to utilize the strengths of Black and other minority communities, strengths which can best be analyzed and incorporated into planning by Black and other minority researchers who share backgrounds and life experiences similar to those of the children Head Start seeks to serve. All future programming, including alterations of Head Start, which will affect Black children must include Black researchers and theorists.

- ***Technical Assistance***

Program monitoring and evaluation are only means to achieve what is both a goal and a responsibility of OCD and everyone working in Head Start: the improvement of services offered to children. Standards and evaluation are meaningless without technical assistance being available to assist Head Start centers in improving their services to children. OCD must provide the technical assistance necessary to insure quality comprehensive child development in Head Start settings.

TASK FORCE MEMBERS

David Rice, *Chairman*

Frances Beckles

Betty Gladden

Sarah Herbin

Ralph Horton

Evelyn Moore

Lee Wade

Child Development Associate Program

The Director of the Office of Child Development of the Department of Health, Education, and Welfare, has announced the initiation of a new profession for individuals interested in working and caring for young children. This new profession is to be known as the Child Development Associate (CDA). The CDA program will be a vehicle for meeting the need for quality child development and day care personnel, and the need for new approaches to certifying qualified people based on their competence and experience rather than on formal academic training. The responsibility for delineating CDA responsibilities, assisting training programs, and credentialing CDA's will be carried out by a consortium of organizations.

In spite of the fact that the CDA is an innovative program which will require change at every level to be successful, the planning for the CDA and the major decision-making authority for the consortium has been entrusted to three organizations—Association for Childhood Education International (ACEI); National Association for Education of Young Children

(NAEYC); Elementary, Kindergarten, Nursery Educators (EKNE)—which in the past have not functioned as catalysts for social change.

Black people, parent organizations and other groups most likely to spearhead innovation and who have the greatest vested interest in change have only been peripherally involved. At the point where these organizations were invited to a meeting to discuss the CDA program, plans were nearly finalized and the project was ready to operate. Organizations, including those representing minority interests, were called in to give an endorsement without any prior policy determining role.

The Seminar participants objected to this way of proceeding, pointing out that it is time for OCD to change its typical top-down way of operating and to begin to really include the population served in planning and decision-making for programs like this one, which will affect Black children everywhere. The participants made specific recommendations about areas of the proposed CDA program.

TRAINING

Training for the CDA certificate should be so structured as to provide equivalency with a college associate degree, which will enable the CDA to enter a four-year college at the Junior year level, if the CDA wishes to continue his or her training.

Approaches to regional accrediting agencies should be made to seek their endorsement for a competency-based training program like CDA. Thus colleges will be assured of accrediting approval if they are involved in designing the program.

The participants endorsed the idea of giving training contracts to a variety of institutions and organizations, but stated that:

all institutions and organizations engaging in CDA training must have a bonafide mechanism for the granting of university course credit for all work done.

Further, the participants stated that no training plans should be devised which would require centers to close while staff

attend training sessions. Where some staff must be absent during the center's operation, provision must be made as part of the training plan for substitute staff replacements at these times. Whenever interest and availability allows, parents should also be permitted to attend training sessions.

BOARD OF DIRECTORS

Since the consortium Board of Directors is the real decision-making body in the program, the participants were very concerned about the composition of this Board. They recommended that the Board of Directors be enlarged to a total of 18 members, composed in the following way:

- *Category A*

The CDA program proposed having three permanent members in this category, representing national early childhood education professional groups which are independent, open-membership organizations (ACEI, EKNE, NAEYC).

The participants agreed that the consortium should include national professional early childhood organizations, but felt strongly that no organization should hold permanent membership or special powers. They pointed out that of the three suggested for this category, only one organization (NAEYC) has any significant minority group membership.

- *Category B*

Two at-large public representatives are to be appointed jointly by the Director of the OCD and the representatives of ACEI, EKNE, and NAEYC.

Participants felt that Public Representatives should be elected by the Board as a whole from among names proposed by the consortium.

- *Category C*

Two members representing other national organizations whose purposes include concern for young children. These

would be elected by representatives from organizations in this category on the CDA Council.

Participants wanted this category limited to three board members drawn from the same type of organizations proposed by the program, and to include placement of one parent representative group on the board.

- ***Category D***

One member representing training, elected by representatives from those training organizations participating on the CDA Council.

Participants agreed that this category should remain as proposed.

- ***Category E***

One member representing accreditation and certification appointed by the National Association of State Directors of Teacher Education and Certification.

This category should be expanded to include at least three board representatives from the - Regional Accrediting Agencies for colleges and universities. This should be accomplished by a modification of the by-laws and require concurrence of the 18 board members. There should be no special weight given to the vote of certain designated members.

- ***Category F***

Representatives of selected groups with an interest in the CDA program.

- ***Category G***

New category proposed by the Seminar members. This category should be created to provide for board representation of five members drawn from organizations concerned with the special needs of young children of minority ethnic backgrounds. Ethnic representation should include, but not be limited to, the following groups: Blacks, Indians, Chicanos, Puerto Ricans, Asians.

CRITERIA FOR MEMBERSHIP IN THE CONSORTIUM

With regard to the criteria by which the organizations in each of these categories would be considered to qualify for consortium membership, the participants had some comments. First they felt that for Category A the constitution or official statement of purposes for the organization should have as its major concern some aspect of child development. They objected to the requirement that the organization be in existence for three years, but they agreed that it should have demonstrated concern for children in its activities.

The criteria for the representatives of national organizations (Category C) should be the same as above with some qualifications:

- a. the organization need not be professional in nature;
- b. its official purpose should include a concern for some aspect of child development;
- c. it must be involved professionally in efforts related to child development;
- d. it must have demonstrated knowledge and experience with a wide spectrum of persons and public programs, i.e., Head Start, Follow Through, Migrant Programs, Title I, ESEA;
- e. it must have demonstrated ability to work effectively with various adult ethnic groups and social classes;
- f. it must have professionally trained personnel who have in-depth experience which indicates an understanding of CDA competencies, i.e., human development, teacher training, etc.

In relation to Category E (one member representing accreditation and certification) the participants recommended that:

- a. membership should be broadened to include representatives of regional accrediting agencies for colleges and universities;
- b. an important purpose of the organization should be the improvement and accreditation of higher education institutions and/or professions dealing with child development.

The participants felt that Category F should be reserved for organizations, because their point of view is needed, and that no other criteria should apply for this category.

For the new category (G), the organization shall be concerned with the special needs of children of minority ethnic backgrounds. In addition, the criteria listed above for Category C should apply for this category.

In relation to the consortium responsibilities, the participants felt strongly that professionals used for competency assessment must include practitioners employed directly in service to children's programs.

TASK FORCE MEMBERS

James Ryan, *Chairman*

Louise C. Bowen

Clory Bryant

Roy Dawson

Marie Fowler

Marjorie Grossett

Salima Marriott

Maurine McKinley

Thomas Taylor

Conclusion

In the first Public Policy Seminar from a Black Perspective concerned, knowledgeable persons with experience in operating community controlled child development centers, with experience in Head Start programs, or with professional experience in related fields came together to look critically at proposed programs and directives that would affect Black children. Such programs and directives have been brought into being without any input from persons like those in the Seminar. Yet these programs are developed in areas where these persons have invaluable contributions to make. The Office of Child Development consistently operates without even *consulting* community persons and minority group representatives who have experience and knowledge of child development, much less involving such persons in any decision-making capacity. The Office of Child Development continues to unveil new programs and directions only at the stage where the basic decisions have been made and the basic direction set—where, indeed, even a consultative, advisory role is meaningless because there is nothing left to consult about.

The participants in this Seminar took time for a careful and judicious analysis of proposed programs and directives, and the results of their deliberations *proved* that the time has come for the Office of Child Development to find time to change its way of operating, and to include people like the Seminar participants in the early stages of development of programs and directions.

The community, especially the minority group members of communities, are an invaluable resource which the Federal Government continues to pretend does not exist. Programs like the CDA program are doomed to become just another exercise in spending Federal dollars without any benefit to our children, if citizens are not involved in the design of such programs. OCD's quest for relevance can be met only in one way—by identifying concerned, experienced community persons who have worked in child development and involving those persons in policy and program decisions that affect the future of children.

Appendix

Participants List

FIRST PUBLIC POLICY SEMINAR FROM A BLACK PERSPECTIVE

July 25-28, 1972

ALABAMA

Ms. Mary Washington
Alabama Federation of Child Care
Operators
481 Chin Street
Mobile, Alabama 36610

CALIFORNIA

Mr. Roy Dawson
Institute for Child Advocacy
4305 South Broadway
Los Angeles, California 90037

Ms. Florence Stroud
Early Childhood Education Project
2800 Turk Boulevard
San Francisco, California 94118

DISTRICT OF COLUMBIA

Mr. Thomas Taylor
National Capital Day Care Association
1020 Third Street, N.W.
Washington, D.C. 20001

ILLINOIS

Ms. Clory Bryant
Afro-American Family and Community Services, Inc.
440 West Division Street
Chicago, Illinois 60610

MARYLAND

Ms. Frances Beckles
National Black Social Workers
200 Hiallah Drive
Glen Burnie, Maryland 21061

Mr. Ralph Horton
Association of Black Psychologists
Morgan State College Urban Center
Baltimore, Maryland

Mr. Ed Jones, Assistant Director
Department of Family and Children Services
1500 Greenmount Avenue
Baltimore, Maryland 21202

Ms. Betty Gladden
Morgan State College
Mental Health Program
5876-2 Steven's Forrest Road
Columbia, Maryland 21045

Ms. Salima Marriott
Community Mental Health Program
Morgan State College
1532 Havenwood
Baltimore, Maryland 21212

Ms. Rosa Porter
MLK Parent-Child Center
560 North Broadway
Baltimore, Maryland 21205

MISSISSIPPI

Mr. John Buffington
Clay County Community Development Program, Inc.
P.O. Box 621
Westpoint, Mississippi 39723

Mr. David Rice
Head Start Director
Community Education Extension
418 Gallatin Street
Jackson, Mississippi 39203

MISSOURI

Ms. Marie Fowler
Linder Cottage
1131 Belt Avenue
St. Louis, Missouri 63112

NEW YORK

Ms. Catherine Boddie
Albany Welfare Rights Organization
Day Care Centers, Inc.
159 Church Street, # 1A
Albany, New York

Ms. Marjorie Grossett
Day Care Council of New York
114 East 32nd Street
New York, New York 10016

NORTH CAROLINA

Mr. Frank Williams
North Carolina Federation of Child
Development Centers, Inc.
Rt. # 1, Box 153
Whitakers, North Carolina 27891

OHIO

Ms. Louise A. Cuyler Bowen
Child Development-Community
Action Commission of the
Cincinnati Area
1524 Linn Street
Cincinnati, Ohio 45214

PENNSYLVANIA

Ms. Jean Hicks
WROAC
159 Bonifay Street
Pittsburgh, Pennsylvania 15210

Ms. Edith Key
Head Start Services Coordinator
Economic Opportunity Council
406 Walnut
Reading, Pennsylvania 19601

Ms. Mary Jane Roy, Director
Erie City Coordinated Day Care
Program
Erie School District
1511 Peach Street
Erie, Pennsylvania

SOUTH CAROLINA

Ms. Freida Mitchell
Ad Hoc Committee of Southeast
Community Child Care Operations
Community Services, Inc.
More, South Carolina 29920

TEXAS

Ms. Odessa Sayles
Harris County Child Welfare Unit and
Chairman, Local Steering Commit-
tee
BCDI Adoption Project
8602 Allwood
Houston, Texas 77016

VIRGINIA

Mr. James Ryan
Social Work Services
Friends Association for Children
713 North First Street
Richmond, Virginia 23220

WASHINGTON

Ms. Charline Hopkins
League of Women for Community
Action
2108 E. 4th Avenue
Spokane, Washington 99202

Ms. Lee Wade
League of Women for Community
Action
2108 E. 4th Avenue
Spokane, Washington 99202

WISCONSIN

Ms. Canary Girardeau
Division of Family Services
819 North 6th Street
Milwaukee, Wisconsin 53203

PUBLIC POLICY SEMINAR FROM A BLACK PERSPECTIVE

SOUTHERN PROJECT

40 Marietta Street, N.W.
Atlanta, Georgia 30303

WASHINGTON, D.C. OFFICE

1028 Connecticut Avenue, N.W.
Suite 514
Washington, D.C. 20036