

# Response to OMB's "PART" Report on Federal Administration of the William F. Goodling Even Start Family Literacy Program

## The Cuts and Consequences

The President's budget proposal for Fiscal Year (FY) 2007, once again, recommends ending funding for the William F. Goodling Even Start Family Literacy Program. For FY 2006 and FY 2005 the President also requested eliminating the funding. The program is currently funded at \$99 Million.

As acknowledged by the U.S. Department of Education (ED), families participating in Even Start are among the hardest to serve, are poorer than families eligible for Head Start, and include only parents with limited literacy and English language skills and their children. More than half are Hispanic immigrant and refugee families. If funding for Even Start ends, 44,000 families, including 47,000 parents and 67,000 children living in poverty will have fewer opportunities to participate in education services to increase basic skills leading to additional education, English proficiency, and self-sufficiency.

## OMB's PART Report on Even Start

The Administration cites a 2002 OMB Performance Assessment Rating Tool (PART) report, listing specific criticisms of the Even Start Family Literacy Program, as justification for eliminating funding. The PART report, however, provides no substantive justification for denying education to the Nation's most vulnerable families. The OMB does not claim to be proficient in the best practices of scientifically based, research-driven education policy or fulfillment. Its primary function in undertaking the PART process is to evaluate the Administration's own management performance. In this case it has found that performance wanting. Through the PART review process, these OMB findings are suspect and self-fulfilling attempts to cut federal spending across the board. PART does not provide an independent rationale for denying the continuing education to the thousands of vulnerable families currently served through Even Start.

The following analysis reviews PART criticisms of Even Start and questions their validity.

## Response to OMB's PART Report on Even Start

Section I.4. (Program Purpose and Design): *"The program is duplicative of ... Head Start, Adult Education, Early Reading First, Reading First, and Title I of the Elementary and Secondary Education Act (ESEA)."*  
*Evidence:* *"HS, ERF, and Even Start serve similar early childhood populations; Adult Ed and Even Start serve similar adult populations. In Title I and Reading First, family literacy efforts are allowable activities."*

- The criticism disregards the unique nature of the Even Start authorizing legislation (ESEA, Title I, Subpart 3), requiring local grantees to "integrate early childhood education, adult literacy, and parenting education into a unified family literacy program" that, in turn, reaches "families most in need of services as indicated by a low level of income, a low level of adult literacy, or English language proficiency of the eligible parent or parents..." Further, the legislation requires local grantees to build on – not duplicate – high quality existing educational services. Even Start grantees provide educational services when they do not have access to a required educational partner in their service area or if those services are not of high quality. Finally, legislative language that "allows" family literacy, such as in Reading First and Title I, is not the same as requiring those activities.
- Even Start serves extremely vulnerable families. The U.S. Department of Education website states that, "no other education program serves a comparable population." They are poorer than those served in Head Start, with four times as many families below the poverty level.<sup>1</sup> While other programs target low-income families, all Even Start families have parents with limited basic and/or English language skills. No other federal education program requires parents to commit to developing their academic and literacy support skills while their children receive early childhood education services. Further, Even Start is the

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<sup>1</sup> Even Start Facts and Figures located at: [www.ed.gov/about/offices/list/oese/sasa/esfacts.html](http://www.ed.gov/about/offices/list/oese/sasa/esfacts.html)

only program in the Department of Education that serves children from birth to age three; ages that comprise the most important period for brain development and for the foundation for learning.

Section IV.5. (Program Results): *“Education has conducted three major evaluations of this program, two including a small experimental design study. None of the studies could show that the parents or children who received these services made greater gains than those who did not. Results from 3 states that have conducted their own evaluations are more positive than the national results, however these evaluations were not as rigorous as the national evaluations.”*

- The National Evaluations of Even Start, cited as evidence in the PART report, are based on data collected prior to improvements requiring scientifically based practices and accountability legislated in the LIFT and No Child Left Behind Acts of 2000 and 2001, respectively. Yet, these evaluations are used to label today’s Even Start Program “ineffective” – without providing post-reform research. The Goodling Institute for Research in Family Literacy (<http://www.ed.psu.edu/goodlinginstitute/>) recently analyzed the Third National Evaluation of Even Start and identified shortcomings in implementation of the evaluation as well as in its underlying assumptions concerning the operation of Even Start programs.
- As noted previously, many Federal education programs serve low-income families; however, Even Start families are among the most vulnerable – poorer, less educated and most in need of coordinated and supportive educational services. Given the level of need and the mandated improvements to the program since 2001, the PART Even Start report might more accurately acknowledge that Even Start performs as well as the other programs cited, as opposed to taking the negative point of view that, *“None of the studies could show that the parents or children who received these services (Even Start) made greater gains than those who do not.”*

Section I.3. (Program Purpose and Design): *“No evidence indicating that increases or decreases in Federal funding for this program would have a clear impact on family literacy.” Evidence: Third National Evaluation of Even Start.*

- PART uses data prior to legislatively implemented improvements to Even Start to conclude that currently “no evidence [indicates] that increases or decreases in Federal funding for this program would have a clear impact on family literacy.” To counter this conclusion requires post-reform Even Start evaluations, that to date, have not been implemented. Regardless, Even Start providers do not have the tools to disprove this negative generalization.

Section III.5. (Strategic Planning): *The Education Department’s (ED) “2004 budget submission satisfies the first part of the question by presenting the anticipated S&E expenditures (including retirement costs) for this program.... However, ED has not satisfied the second part of the question because program performance changes are not identified with changes in funding levels. The program does not have sufficiently valid and reliable performance information to assess the impact of the Federal investment.*

Section IV.1 and IV.2. (Program Results): *“Since targets have not been set, it is not currently possible to assess progress toward meeting them.”*

- PART lists a 25% goal for adults in Even Start to earn a secondary school diploma or a GED. It is unclear if a “goal” is different from a “target.” Actual performance is recorded by ED for 1999-2001, but apparently not after 2001. Again these are criticisms of the ED’s administration of the program; not the program’s effectiveness in practice.
- Many of the criticisms of Even Start target the lack of sufficiently valid and reliable performance information that would set numerical targets for long-term and annual performance goals and, as a result, the inability to assess progress toward meeting them. Again, these are administrative issues outside the control of program providers or participants.

Section II.6. (Strategic Planning): “The program does not have a strategic planning framework where a limited number of annual performance goals demonstrate progress toward achieving long-term goals. Thus, at this time, performance goals are not currently aligned with budget policy.”

Section III.4. (Strategic Planning): “This program has not yet implemented measures and procedures to improve cost efficiency ... However, as part of the President’s Management Agenda, the Department is implementing an agency-wide initiative to re-evaluate the efficiency of every ... business function....”

Section III.2. (Program Management): “The program has not instituted an appraisal system that holds Federal managers accountable for grantee performance. However, as part of the President’s Management Agenda, the Department is planning to implement an agency-wide system – EDPAS – that links employee performance to progress on strategic planning goals. Grantee performance is monitored on an annual basis through review and approval of annual budget plans, compliance reviews, audits, and site visits.”

- Even Start is criticized for lacking a strategic planning network, lacking an appraisal system that holds Federal managers accountable for grantee performance, and not implementing measures and procedures to improve cost-efficiency. All are Federal agency tasks and Administration responsibilities that have contributed to the inability of Even Start programs to aggregate data and document effectiveness at the national level. Budget decisions that weaken Even Start programs’ ability to be effective are being made without the Department of Education fully implementing long-sought measurement instruments.
- The lack of measurements does not advance, in and of itself, the conclusion that the program is “ineffective.” States are expected to and are implementing policies and procedures that hold local Even Start grantees responsible for improving the participant outcomes and using related performance indicators to make funding decisions, thereby holding local grantees accountability.<sup>2</sup>

Section II.1. (Strategic Planning): “The program has two outcome goals for adults and two for children.... However, the program lacks numerical targets for its long-term goals.” Evidence: “Even Start indicators of program quality and Section 1240 of the No Child Left Behind Act of 2001.”

Section II.2. (Strategic Planning): “The program must set numerical targets for its annual goals and ensure that data exists to report on whether those targets have been met.” Evidence: (none)

Section II.3. (Strategic Planning): “SEAs (State Education Agencies) are required to develop indicators of program quality to monitor, evaluate, and improve their programs.” Evidence: “While States have begun to ... to set performance goals around specified measures, they do not fit into a strategic framework since the Department has not established numerical targets... A process should be put in place to ensure the State goals are rigorous and that would help ensure achievement of national goals set by the Department.”

- At the time of the PART review (2002) the Department of Education had not successfully implemented the federal Government Performance Review Act (GPRA) and, therefore, did not have a system in place for evaluating its programs, including Even Start. The goal of this process is to determine baseline data; setting numerical targets. The Even Start GPRA initiative has since established processes to set baseline data; conducted training on the use of assessments for adult and child literacy outcomes tied to national goals; and continues to assist States in setting rigorous goals. The Department’s general counsel had determined that specific measures could not be required of Even Start since that could be interpreted as supporting various commercial products used in the program. However, since August 2005, Even Start state coordinators have been notified that they are expected to use specific instruments in reporting future outcomes.

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<sup>2</sup> See, for example, Colorado Even Start Progress Report 2004-2005; Statewide Evaluation of Pennsylvania Family Literacy Programs 2004-05 (in draft); Nebraska Even Start Family Literacy Programs 2004-2005.