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**THE NON-FEDERAL MATCH REQUIREMENT FOR
HEAD START:**

**WHY DOES IT EXIST AND HOW DOES IT AFFECT
A LOCAL HEAD START PROGRAM?**

A Capstone Paper for the Center for Public Policy and Administration

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**THE NON-FEDERAL MATCH REQUIREMENT FOR HEAD START:
WHY DOES IT EXIST AND HOW DOES IT AFFECT A LOCAL HEAD START PROGRAM?**

ABSTRACT: This paper looks at the relationship between the non-federal match requirement for Head Start programs and program operations with regard to parent engagement. It argues that the purpose of non-federal match is perceived differently depending on the position of the person asked, and an exploratory case study is conducted to identify these differences. Non-federal match requirements are compared to practices of capturing this match from parent engagement at a local Head Start program and managers are interviewed from the site, program and federal level. The purpose of the non-federal match requirement, its burden on program operations, and the relationship of the requirement to parent engagement are all shown to vary depending on one's position in Head Start. Recommendations are made for better capturing non-federal match at the local level and for conducting a more comprehensive study of the issues raised at a national level.

INTRODUCTION:

For every \$80 dollars that the Federal government uses to fund Head Start programs, the program itself must come up with an additional \$20 from a variety of other sources. This is known as the non-federal match requirement. Why is there this requirement and how does this affect Head Start operations? In particular, how does this affect parent engagement -- a core value of Head Start?

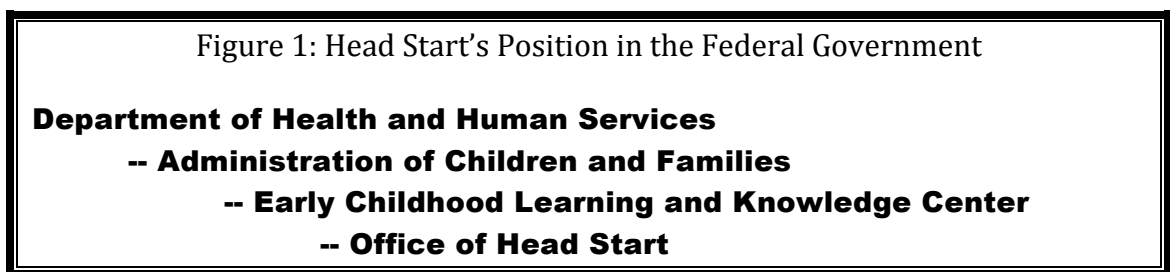
This paper addresses these questions and presumes that the answers may vary depending on the source asked. Using interviews, I examine a possible mismatch between different actors' perceptions of the non-federal match requirement in terms of both its purpose and its effects. Using documents and databases, I examine a possible mismatch between what is submitted as community contributions to non-federal match and what is actually allowable.

After a brief history of Head Start and its parent involvement component, the methodology for collecting information from both local and national Head Start centers is described. Findings are then reported and summarized followed by recommendations for both the local and national Head Start programs.

BACKGROUND:

Since 1965, low-income children have had access to a comprehensive early childhood development program funded primarily by the federal government. This is Head Start (Lynch, 2011). In addition to early education, federal guidelines mandate that “children receive nutritious meals, that their medical needs be assessed, and that parents be involved in the program”(Currie and Neidell, 2005).

Originally started as a summer program, Project Head Start was a component of Lyndon Johnson’s war on poverty. President Nixon established an Office of Child Development (which was to house Head Start) and placed it under the Health, Education and Welfare Department (Jacobson, 1995). The Office of Head Start is currently under the Department of Health and Human Services and its position in the federal bureaucracy can be seen in Figure 1.



Although she admits that “the jury is still out” as far as Head Start is concerned, Janet Currie argues that it makes sense from a simple cost – benefit analysis (Currie, 2001). Childcare programs involving early intervention strategies have been shown to increase the amount of human capital of children and increased spending on Head Start has shown to lead to higher reading and vocabulary scores (Currie and Neidell, 2005). Cases for government intervention in early education have been made in terms of both equity and market failure (Currie, 2001). In the 2011 fiscal year, about \$7.3 billion was spent on about 960,000 enrolled children (about \$7,600 per child).

NON-FEDERAL MATCH AND IN-KIND

Head Start funding is different than most other US education programs in that the federal government funds local agencies directly (as opposed to funding states which then fund local agencies). These agencies apply to Health and Human Services and must show that 20% of their program costs come from non-federal funds. This is what is referred to as the non-federal match. (Currie and Neidell, 2005).

These non-federal funds can come from state or local governments as cash, but a significant portion comes from in-kind contributions of space, materials and volunteer time. In-kind donations of time and goods from community members at the site level (mostly parents) are generally referred to as “In-Kind” at the local Head Start program studied in this paper. Managers at the local program are well aware of the fact that 20% of program costs must come from In-Kind contributions

and that the recent poor economy has made the volunteer contribution more important.

Head Start is by no means the only program required to provide a non-federal match in order to receive federal funding. The National Affordable Housing Act required local spending on social services that were to ‘complement’ housing funding (Khadduri, 1992), and the Federal Highway Administration publishes a guide for non-federal matching requirements for their funded grants. The idea of a match goes back at least as far as Booker T. Washington and Henry Huttleston who incorporated a match in improving schools for black Americans. Washington reasoned that recipients would have a larger stake in the program recognizing the hard work involved (Deutsch, 2011). This implies that there is more to matching than the financing of a program.

The effect of non-federal match requirements on program success has not received any empirical attention. There are studies that suggest paternalism as an explanation for the existence of in-kind transfer programs (Currie and Gahvari), but these studies define “in-kind” in the sense of goods versus cash. Requiring that low-income parents contribute ‘their’ time to ‘their’ program can also be viewed as paternalistic. The government, in this view, is willing to help those who help themselves.

PARENT INVOLVEMENT (ENGAGEMENT)

Parent involvement has always been a core concept of Head Start in that parents are to be ‘captivated’ by their own children. In his book on the history of

Head Start, Edward Zigler says that the Planning Committee “took a stance that children would benefit from their parents’ direct involvement in the program, and that the best way for parents to learn about child development was through actual participation *with* their children in the daily activities of the program” (emphasis by Zigler, 93). The balance (and resulting tension) that the committee had to contend with was between educating parents (a deficit model linked with ‘cultural deprivation’) and empowering parents (preferred by leaders of Community Action programs). Bessie Draper was Head Start’s first parent-program specialist and wanted parents to be “equal partners” with the professional staff. Recently, parent ‘involvement’ has been referred to as parent ‘engagement’ across Head Start.

Parents’ in-kind contributions, however are not mentioned in Zigler’s history of Head Start and one can conclude that parents providing a significant portion of the budget was not among the core values of the Head Start program. The fact that there is also no mention of non-federal match or in-kind in Zigler’s more recent 2010 ‘secret history’ of Head Start provides further evidence that it has not been viewed as an essential component from the perspective of its founding. Even if it had been an expectation, the logistics of mothers volunteering in classroom (and other) settings has become much more complicated as their participation in the labor force has risen significantly in the past forty years (Folbre, 2012).

Parent engagement is minimally mentioned in both Head Start reports to Congress and in the annual national ‘fact sheets’ (biennial Head Start report to congress, 2009). Only the number of total volunteers is reported and the subset of those volunteers who are parents. There is no mention in the amount of hours

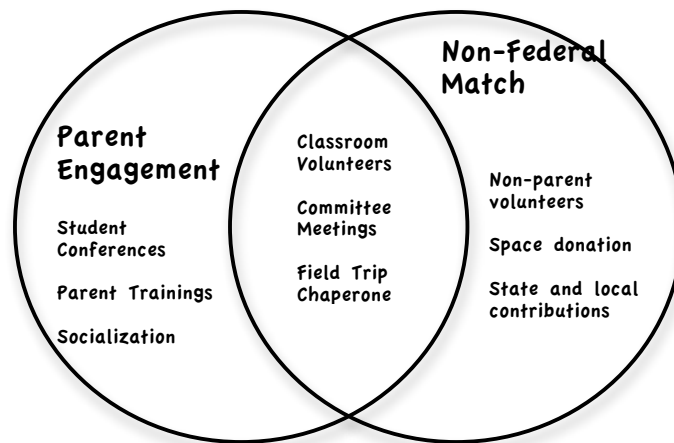
contributed. At the local level, the most recent annual report describes ways in which parents have been engaged with the program, but make no mention of how this involvement contributes to the non-federal match requirement (PCDC annual report, 2011).

However, not all parent engagement counts as in-kind contributions and hence neither to the non-federal match requirement. According to Head Start regulations:

“A parent involvement activity that primarily benefits the parent and their child is not considered an allowable cost for an in-kind match. An activity that provides a good or service to benefit the program is considered an allowable cost for an in-kind match.”

The following Venn diagram (Figure 2) shows the relationship between parent engagement and non-federal match according to Head Start regulations:

Figure 2 Relationship between Parent Engagement and Non-Federal Match according to Head Start Regulations



The local Head Start agency collects parent and community in-kind contributions at the individual site level, but it is entered centrally by the central administration for both budgetary and program review purposes. Program reviews

happen every three years (entitlement reference). Agencies showing improper use of in-kind contributions may be required to re compete for future grants (Lynch, 2011). The remainder of this paper investigates how different employees within the Head Start organization view the relationship between the non-federal match requirement and parent engagement. In other words, does everyone view this relationship as it is portrayed in Figure 2?

METHODOLOGY:

An exploratory case-study approach was used to investigate the role that the federally mandated non-federal match plays in the happenings of a local Head Start agency. This study should not be seen as a comparison of two cases but rather as one case that looks at the perspectives different actors take in regards to the purpose and effect of the non-federal match requirement. The 'central' actors were those made up of federal employees and employees of organizations that work with Head Start at a national level. The 'local' actors were various managers for a Western Massachusetts Head Start program. Evidence was gathered in two ways: by a series of semi-structured interviews (with participants from both 'central' and 'local' groups) and by documentation of the processes of non-federal match. Centrally this came from regulations and procedures for collecting and presenting non-federal match data. Locally this came from the reports produced from the non-federal match data actually collected in the 2011-2012 school year.

SEMI STRUCTURED INTERVIEWS

For the semi-structured interviews, four initial questions were designed to generate information related to the purpose of the non-federal match. Question 1 was simply “What is the purpose of the non-federal match requirement for Head Start?” If the term ‘non-federal match’ was not understood, the question was rephrased with ‘In-Kind requirement’ and was related to non-federal match. Question 2 was “Is the effort of collecting and demonstrating the non-federal match worth the benefits it produces for the program?” The word ‘program’ was used in order that the effort was viewed as program-wide rather than just from voluntary contributions from the site level. A follow-up question was used, if necessary, to make this distinction. Question 3 was broadly posed as “What would happen to parent involvement (engagement) if the non-federal match requirement were removed?” Question 4 asked, “Is the non-federal match requirement help or hinder parent involvement? Why?” This question was designed in order to capture whether the non-federal match was primarily viewed as a help or hindrance in case the previous answer showed both pros and cons.

The ACF (Administration for Children and Families)/Head Start website was initially used in order to find candidates for the ‘central’ perspective, but initial attempts to identify and contact people were unsuccessful. Contacts were then made with individuals who still had a central perspective but were not officially employed by Head Start. These interviewees include a director of PROMIS (the database licensed by many Head Start agencies), an attorney specializing in teaching and defending Head Start agencies, and an information specialist contracted to

respond to questions about Head Start. All were Washington based. They were interviewed and are identified as 'central associates'. Through their interviews, actual employees of ACF/Head Start of Head Start were identified, contacted and in two cases interviewed. They are labeled 'federal managers'. These interviews were conducted over the phone and lasted between 15 and 20 minutes.

For the 'local' I had access to the organization chart and was familiar with the positions from experience. Two people were chosen who were in charge of collecting and entering the non-federal match from sites under their management. These two are labeled 'site-level managers'. The other two were at the entire program level of management and were responsible for the synthesis of non-federal match information for both budgetary and evaluation reasons. For analytical reasons they are labeled 'program-level managers'. These interviews took place either in person or on the phone and lasted between 15 and 20 minutes each.

REGULATIONS AND REPORTING

Whereas the interviews capture the different perceptions of non-federal match from the actors, it also seems important to ascertain any difference between the stated non-federal match policy and the practice of collecting and recording non-federal match data. Since the relationship between non-federal match and parent involvement was primary, this part of the study looks at the volunteer hours and donations (referred to as 'In-Kind' by staff) received at each site. Along with the interviews, I compare how non-federal match (especially that portion that comes from volunteer in-kind time) was articulated on paper to the actual capturing of that information at the site level.

For the central level, there two sources: the actual regulations and then the accompanying explanatory pieces which were provided by a law firm that specializes in working with Head Start programs in meeting these regulations. For the local part, estimates of in-kind contributions were procured through the PROMIS database. Those activities that did not seem to match were put into a category of 'other'. This 'other' category is important in that it is a reflection of the compliance level of the organization in terms of in-kind reporting.

FINDINGS:

The non-federal match requirement is not universally understood across Head Start in terms of its definition, its purpose or its impact on programming. The in-kind reporting shows a mismatch between regulation and practice. The interviews show differences in perceptions in terms of its purpose and impact.

IN KIND REPORTING

The 'wage' that a volunteer gets credited for their time is based on what a program would expect to pay a staff person to do the same work that a volunteer does. When collecting in-kind, the number of volunteer hours is multiplied by this 'wage' and this amount can go towards the non-federal match requirement. About 13% of the value of this reported in-kind from local Head Start sites came from activities that are not 'allowable' according to Head Start regulations as can be seen in Table 1.

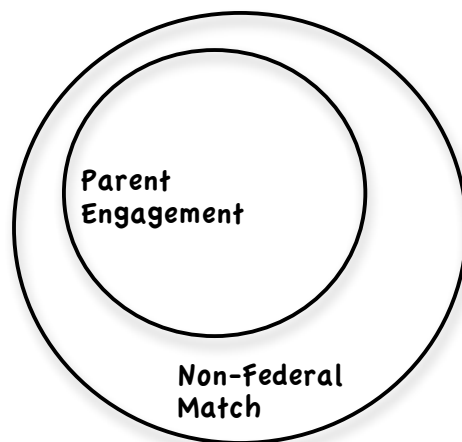
This is due to an established culture of reporting activity whenever a parent was present at the various sites. The 'other' category included parent conferences, socialization activities, open houses and end of year celebration – none of which would be activities that Head Start would pay an employee to attend.

Table 1 In-Kind Valuation of Volunteers for September-October 2011 by category

Activity	Percent of Total Value
Classroom Volunteers	50%
Family Meeting	25%
Other	13%
Policy Council	7%
Parent-Child Activities	5%

In contrast to Figure 2 (the regulation Venn-Diagram of Parent Engagement and In-Kind contribution, Figure 3 shows the understanding of this relationship from the local Head Start employees that report in-kind contributions at their sites:

Figure 3 Local Head Start Understanding of Parent Engagement and In-Kind Contributions according to In-Kind reporting

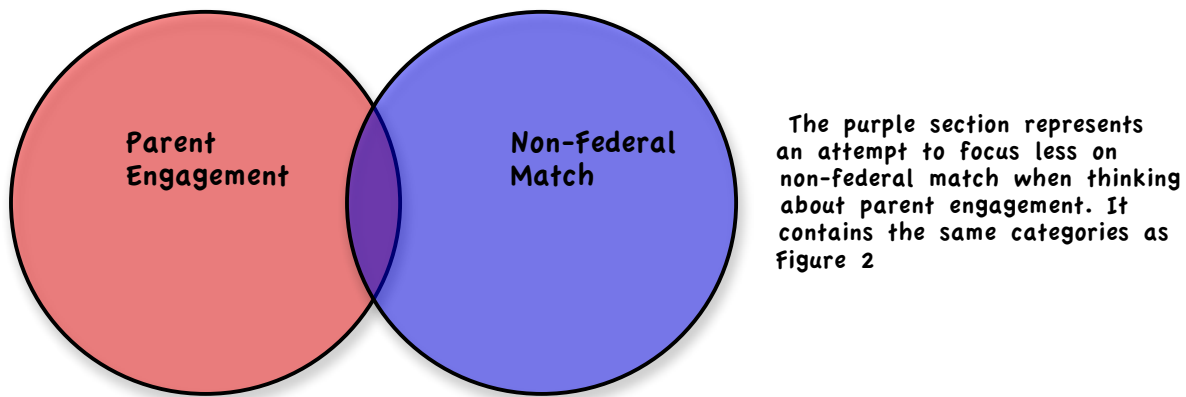


RELATIONSHIP BETWEEN PARENT ENGAGEMENT AND NON-FEDERAL MATCH

Figure 3 also corresponds with what the site-level managers shared in their interviews with regard to the purpose of the non-federal match. They saw it primarily as a regulation that allowed parents and community members to participate in the program. One manager said that without it there wouldn't be a way for families to feel as if they are contributing to the program.

Program level managers, however, were quite aware that parent engagement in an important, core feature of Head Start and would (and in one case should) exist without the non-federal match requirement. Their Venn diagram would look more like the one in Figure 5.

Figure 5 Author's view of Relationship between Parent Engagement and Non-Federal Match from Program Manager Interviews



The degree of overlap is significantly less than in Figure 2. This is due to the fact that there was a stated effort to maximize non-parent volunteer forms of non-federal match in the past year. Parent engagement, in their opinion should not be

dependent on non-federal match requirements although these managers did admit that the requirement ‘forces the issue’.

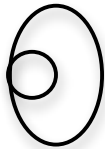

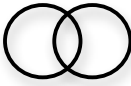
From both of the federal manager interviews, the idea of a non-level playing field came up when it came to discussing the effort it takes to satisfy the non-federal match requirement. Both alluded to programs that were ‘fortunate’ enough to receive a significant portion of non-federal match from donated building space. Less ‘fortunate’ programs needed to rely more heavily on the actual time and goods donated by the community in order to meet the requirement. Central associates concurred. This seems to go against the logic of these managers’ perceived purpose of non-federal match: to make sure that communities are involved in Head Start. This makes it unclear how to construct a Venn diagram from their perspective.

Contrast this to the local program managers who see community involvement as a priority. To them the purpose of the non-federal match requirement seemed more political: a way to ensure future funding by showing that it is not just charity. There was also concern that ‘fortunate’ sites within a program would be preferred to ‘needy’ sites if it came to reducing program services. These findings are summarized in the first two rows of Table 2.

LEVEL OF BURDEN

The third row of Table 2 summarizes how the level of burden created by the non-federal match requirement is viewed by the different entities. The fact that there are law firms that specialize in providing Head Start programs with webinars on reporting and documenting non-federal match leads one to believe that it is not a

Table 2 Summary of the Author's Findings

Topic	Local Site-Level	Local Program-Level	Federal Managers	Federal Documents
Purpose of Non-Federal Match	To allow parents and communities to participate	Political – to show that funding is more than charity	To force the issue of community engagement	??
Relationship between Parent Engagement and Non-Fed Match	PE subset of NFM 	Tend towards separation 	Unclear	Overlap each other 
Level of Burden	Manageable	Cumbersome	Challenging, but doable	No data found
Match as 'Money'	Requirement for getting funding	Not the same as federal money	Unclear	Real

trivial matter. All interviewees recognized a significant level of effort needed to meet the requirement but it varied considerably in the way it was articulated.

Site-level managers saw it as a minimal effort for the returns they perceived it brought in. For them it was just a matter of collecting signatures and entering information into a database and if this allowed parents the feeling of greater participation then it was worth it. Program level managers saw it as more of a burden and yet another bureaucratic task to do. One person said that if there weren't so many other regulations then it would make sense.

Federal managers acknowledged that it required an effort (even more so during recent economic times), but pointed to flexibility and waiver potentials as

ways of easing the burden. However, one manager said that not making the requirement was usually a case of dysfunctional management. Central associates were split where one saw it as increasingly cumbersome; the other felt it quite manageable.

FUNNY MONEY?

Although not specifically asked about, the tangibility of the non-federal match came up with several interviewees. The fact that one of the subheadings on a non-federal match training document states “This is not funny money” implies that there are some in the program who believe that it is.

Federal managers mention community involvement as the primary purpose for non-federal match, but they also alluded to its financial value. One interviewee said that one ‘could’ look at the non-federal match as 20% of an 8 billion dollar program and that the removal of such a program would be a loss of over a billion and a half dollars.

At the local level, one program level manager referred to non-federal match accounting as ‘funny money’ and another shared that crediting an unpaid intern with x dollars is different than receiving x dollars and then spending it on an intern. One has greater freedom of choice in how one spends the money in the second scenario. This implies that the non-federal match isn’t valued in the same way as the grant money coming in from the federal government.

The site level managers both saw it as real money in the sense that it attributed a real value to the work that parents contribute at the site level. An initial

capturing of these differences is summarized in the final row of Table 2, but further questioning on this matter would allow more specificity.

LIMITATIONS

Only a handful of people were interviewed for this initial exploratory case study, and the findings would be much stronger if they held true for another round of interviews (with at least another two people from each category).

Also, my connection to the organization has changed substantially since beginning to think about this study. Although questions were asked objectively, I (as opposed to an outside observer) may have been listening for responses that I had already begun to formulate in my head.

Finally, I only interviewed people employed by Head Start. Missing is the parents' perspective into the relationship between engagement and non-federal match.

RECOMMENDATIONS FOR FURTHER STUDIES:

Most of my recommendations come from the realization that I was not able to answer the question I initially set out to find: How does the non-federal match requirement affect parent engagement? At this point, Head Start itself doesn't collect parent engagement data in a way that allows one to find a good answer to this question. For example, Head Start reports the number of parent volunteers at each program, but not the number of total hours volunteered. This would make a program with 500 parents giving an hour a piece look preferable to a program with

100 parents volunteering for 50 hours apiece. However, even without answering the question fully, there are still recommendations that can be made.

Recommendation One: The local agency should revisit regulations about In-Kind. In the short term, the local agency can better identify that parent activity that qualifies for non-federal match. In fact, this recommendation has already started taking place at the local agency. Table 3 is an extension of Table 1 showing additional categories as well as a significant decrease in the amount of activity that could be deemed ‘unallowable’.

Table 3: Changes in In-Kind reporting from Fall 2011 to Fall 2012

Activity	Percent of Total Value 2011	Percent of Total Value 2012
Classroom Volunteers	50%	28%
Family Meeting	25%	28%
Other	13%	3%
Policy Council	7%	6%
Parent-Child Activities	5%	5%
Health Fair		14%
Interns		16%

Note how the percentage of ‘other’ had dropped from 13% to 3%. By simultaneously eliminating unallowable activity and identifying new allowable activity (interns, health fair) the organization has been able to increase the overall in-kind contributions while taking pressure off a potential audit. A much more detailed presentation of this recommendation (as power point slides) can be seen in Appendix 1.

Recommendation Two: Carry out a quasi-experiment nationally on the effects of non-federal match requirements on parent engagement. I believe this paper is a pre-requisite to such a study, but the following steps would have to be taken as well:

- a) Identify two similar Head Start programs where one is 'fortunate' in terms of space donation and the other is not
- b) Compare the level of parent engagement both quantitatively and qualitatively

Such a study could give insight into whether or not the pressure of the non-Federal match requirement truly benefits Head Start sites.

Recommendation Three: Question the parameters of the non-federal match requirement. A 20% across the board match requirement seems somewhat arbitrary and unfair to certain programs. A formally stated purpose of the requirement at the national level might allow the federal government to rethink how best to encourage parent engagement as well as to best fund the programs.

CONCLUSION:

The answer to the question posed in the introduction, "How does the non-federal match requirement affect parent engagement?" has proved difficult to answer. However, the preliminary research reported here should make it easier to design and implement improved data collection on the local and national levels.

Some information surprised me. I came into this study viewing the match requirement as punishing those already in unfortunate circumstances, but talking with site-level managers allowed me to see that the requirement also enables parent empowerment. Even though the founders assigned this empowerment in their charter, the match requirement has programs look at it on a regular basis.

Program level managers seemed to match best with what the founders had in mind of Head Start parent involvement both from their interviews and their program reports. Site level managers matched federal managers in that both see non-federal match as essential for parent participation, although with different aspects of paternalism. Site-level managers play the enabling parent (finding opportunities) whereas the federal play the disciplinary parent (requiring that they be involved as part of the Head Start community).

Although views about the non-federal match requirement varied from position to position, the goals of Head Start were clear across the board. Having parents truly engaged with their child's early years was an important goal for everyone involved in the study. The founders of Head Start would be happy to know that. What remains elusive is a clearly stated purpose (in writing) about the purpose of the non-federal match requirement. Linking the purpose more closely to the already accepted goal of parent engagement could make Head Start programs more effective in realizing both of these goals.

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