

## Introducing the New Head Start Program Performance Standards

### Overview: Suspension and Expulsion

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Dr. Blanca Enriquez: Welcome to this discussion of the Requirements on Suspension and Expulsion in the New Performance Standards. Sangeeta Parikshak and Catherine Hildum will describe how consistent with longstanding Head Start policy, the new Standards clearly prohibit the expulsion of children from Head Start programs, and set strict limitations on the use of temporary suspension.

Sangeeta Parikshak: We are here today to dive a little bit deeper into talking about Section 1302.17 Suspension and Expulsion. I am really excited about this section, actually. It's a new regulation, as you said. And what it does is it really codifies longstanding practice to not expel children from Head Start programs. So not only does it talk about prohibiting expulsion outright, but it also talks about severely limiting suspension for our young children. It's really important to highlight that it focuses on keeping children in the program.

So even if they are demonstrating challenging behaviors which kids at this age sometimes do, we really want to do our best to help the programs to keep kids in these settings, even if they have difficult behaviors.

Catherine Hildum: Great. You mentioned that it's longstanding practice. Why are we doing this now, why is it in the regulation if programs are really doing this anyway?

Sangeeta: So, I think it's actually really timely that we are putting this new regulation out because we actually have been researching suspension and expulsion for a while, and now we have a lot of new research to demonstrate that actually pre-school kids are getting expelled at very high rates. Often times when you think about expulsion or suspension you think about the kid in high school who is acting out.

Catherine: Or middle school or like older kids.

Sangeeta: Right but it's actually, we are finding that pre-school kids are getting expelled at very high rates. The other piece of the research that we are finding is that boys of color are actually getting expelled and suspended at much higher rates than other children. And that African American girls are getting suspended at higher rates than other girls.

And so, I think it's really critical that Head Start take a lead and demonstrate not just in longstanding practice but also in regulations that we are going to come out very strong, not expel our children, but really do the best that we can to promote their social and emotional development and keep them in the program.

Catherine: Sure. And making sure that they are safe and that they have the opportunity for high quality services that Head Start provides. How does this Standard address the safety of children and staff in the classroom?

Sangeeta: So, they discuss how programs must prohibit or severely limit the use of suspension due to a child's behavior. But there is some flexibility. Throughout the Standards we have tried to provide flexibility for every program's individual needs. So this is an example of how we are doing that. If a child does pose a serious safety threat, then what we say is that a temporary suspension can be used as a last resort. And the focus here is really taking the steps to ensure that the child is safe, first and foremost, but also doing everything we can to help the kid remain in and benefit from program activities.

Catherine: Okay, great. So if a temporary suspension is necessary, what are some things programs can do to ensure that a child is able to return to the program and have the supports they need to be safe themselves and keep the other children safe?

Sangeeta: Through TA, we have a lot of things that we have been putting out and will continue to put out. But the Standards actually do a nice job of highlighting what are the steps that programs must do.

Catherine: What are some of those?

Sangeeta: Engaging with a variety of resources, that includes a mental health consultant, it includes parents, it includes other community resources such as a psychologist. So really, anyone that could be impacting the child in a positive way and kind of helping to support their development, we want to engage with them. Also, it's important that programs document whatever actions and supports are needed. So whatever they are finding out about that individual child we want to carry it forward and have it written down in a place to help them along the way.

Catherine: Okay. So if they continue to demonstrate behaviors, then their caregivers or teachers down the road —

Sangeeta: — Might know what could be helpful for them.

Catherine: And have some resources.

Sangeeta: Right, exactly. Also providing other services, particularly home visits. So, if a child is being suspended, that means they are not in the program at that time, they are at home. And so, that could lead to maybe a disconnect with the people that they see every day. And so it's important to provide those additional services, go into the home, and make that connection to say, "You know, you are not out of the program, but you are going to be coming back soon."

And so, really working with them in the home environment is important, and also determining whether it may be appropriate to refer the child for an evaluation to see if they qualify for services under IDEA, which is the Individuals with Disabilities Education Act.

Catherine: Okay. So that's really important. And then one of the things you said I think is really important is long standing time. I've had stories of the family engagement and that really working with the parents because they are a key part of the child's education and how they can help with the challenging behaviors in particular. You also mentioned engaging mental health consultant. When should a program bring in a consultant?

Sangeeta: That's a good question. So, within this section, in 1302.17, we say that before a program determines that a temporary suspension is necessary, that the program must first engage with a mental health consultant. But in 1302.45, which is Child Mental Health and Social and Emotional Well-Being, we actually talk more extensively about mental health consultation.

And we talk about how it should be used, mental health consultations services should be used preventatively, so really we talk about parental consent and how when a child is first enrolled in the program, then they should be looking at mental health consultation as one of the services that are provided.

Catherine: Okay, so that really from the beginning mental health consultation is important. And that kind of is an important point as well, that folks should read the Mental Health and Social Emotional Well-Being section along with Suspension and Expulsion to see how it all goes together in preventing these behaviors. You talk about, you said, that explicitly the Standards prohibit expelling a child or unenrolling a child, as some programs might do, because of their behavior. What can programs do to address challenging behaviors?

Sangeeta: The regulations also lay out steps for this, as well, which I think is really nice. And we are trying to be as helpful as possible. We are not trying to leave people kind of out in the lurch, right.

Catherine: Sure, it's a big issue for some programs.

Sangeeta: So again, if they pose a serious safety threat, we want to make sure that at a minimum, we engage the mental health consultant. That we consider both whether a child qualifies for services under IDEA, as I mentioned before, but also under section 504 of the Rehabilitation Act because sometimes a child can qualify for services under a section 504 and not under IDEA due to different state definitions of what disability is.

Catherine: That's important for programs to know.

Sangeeta: And also it's important for programs to make sure if they know whether a child has a current Individualized Education Program or Individualized Family Services Plan. They want to make sure that if

that's already in place, that those children are given the supports that they need up front, and that can also prevent those challenging behaviors from occurring.

Catherine: Great. Are there cases, I mean it seems there may be cases where there is a serious safety threat, and the program has exhausted all of these steps that you mentioned and that are mentioned in the regulation, and what can they do after they have exhausted all those steps? Are there options for programs?

Sangeeta: There are options. Again, we want to make sure that programs collaborate, and continue to collaborate with the mental health consultant, with the parents first and foremost, with the teachers and with, maybe the agency that is responsible for implementing IDEA, if that is appropriate in that particular case.

So make sure that collaboration happens and then you come together as a group and if that group decides, "Okay, we have done everything we can do," and this is really not the appropriate place for this particular child, then the language that we have in the regulations is that, "The program must directly facilitate the transition of the child from that one place to somewhere else that's more appropriate."

Catherine: Okay, not just saying you can't come to Head Start, but making sure that the Head Start program works directly with another program so that the child is enrolled somewhere that is appropriate.

Sangeeta: Yes, and we really just don't want a lapse in services. We want to make sure that there's sort of what we call a warm hand off, right, so everybody can go and talk to whoever the new person is that's going to be taking over the care of the child, and say these are all the supports that we have in place for them, these are the things that work, these are the things that don't work. And so it's not just the kid kind of left alone to figure it out, right?

Catherine: Great, yes, that's really important. Especially with some of the challenging behaviors that these children and families are dealing with. It's important that they get to the next place.

Sangeeta: Yes and you have asked about kind of, when a child has a serious safety threat or challenging behaviors, what other things can programs do? So I just want folks to know on the ECLKC, we do have a lot of resources around how to work with children with challenging behaviors and we will be rolling out more with the new regulations. So I just want folks to know we are there, we are there to help you out, we are not going to leave you in the lurch.

Catherine: Right, and as you mentioned before there is also going to be technical assistance available on this section and other parts of the Right to Help programs.

Sangeeta: Right. I think when it comes to Suspension and Expulsion, we really don't want to lose sight of the fact that we are here to help all of our kids around social development as well as emotional

development. And that's where this piece, as well as the mental health piece that I talked about really fits in. So if we think about the Head Start Early Learning Outcomes framework. We talk very extensive about social development and emotional development.

And so if we can work with kids when they are first enrolled in the program around these different areas, then hopefully we can prevent challenging behaviors from occurring, and then we won't even have to think about resorting to something as dire as suspension or expulsion.

Catherine: I think that's a really good way to think about it, is preventing these behaviors before they happen if we can. That's great. Giving all kids a Head Start.

Sangeeta: That's right.

Catherine: Well, thanks so much for describing this in detail. It's really helpful to hear more about it in this new year regulation.

Sangeeta: Thanks.

Catherine: Thank you.

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