



Head Start Eligibility: Recommended Changes to the Head Start Act

Head Start's **mission**—to provide equitable opportunity for success in school and in life to children from disadvantaged backgrounds—remains as present in today's Head Start as it did at the time of its creation. Head Start's multigenerational and holistic approach to children and their families is what makes Head Start¹ unique among early learning programs.

As Head Start looks to the future, updates to the Head Start Act are necessary in order to continue effectively accomplishing this pledge. Most pressing, Head Start **eligibility criteria** have become increasingly detached from the needs of children and families across the nation.

In order to address the increasing barriers that children and families face, the National Head Start Association (NHSA) convened a working group in the spring of 2021. The working group comprised 45 Head Start program and association leaders from 32 states representing the diverse Head Start community. The working group recommends the following changes to eligibility for consideration in a reauthorization.

Our gratitude

We extend our gratitude to Head Start directors Kimberly Shinn-Brown (Ozarks Area Community Action Corporation, Springfield, MO) and Keesha Woods (Los Angeles County Office of Education Head Start, Los Angeles, CA) for co-chairing this work group, and for the input and ideas from the 45 members of the Head Start community who participated in drafting these recommendations.

¹ Throughout this document, the term Head Start includes Early Head Start (prenatal - 3 years old), traditional Head Start (3-5 years old), Migrant-Seasonal Prenatal - age 5 Head Start, American Indian/Alaska Native Head Start and Early Head Start, and Early Head Start-Child Care Partnerships.



Our mission is to coalesce, inspire, and support the Head Start field as a leader in early childhood development and education.

Income Eligibility Recommendations

Current law sets an income limit for Head Start eligibility at 100% of the Federal Poverty Level (FPL), with 35 percent of program slots able to be designated for 130% of FPL. For 2021, this amounts to \$21,960 for a family of three and \$26,500 for a family of four. Those experiencing homelessness or in foster care are categorically eligible for Head Start. Programs must set additional selection criteria to further assess relative need in cases where there are more eligible children than slots.

In many parts of the country, especially those with higher costs of living, the FPL has long ago ceased to be an accurate measure of poverty; indeed, numerous family support programs set eligibility levels well above 100% FPL. This one-size-fits-all measure is disconnected from the lived experience of families and the true needs they face. In a nation as diverse as ours, it simply does not make sense. As a result, current income guidelines restrict families with genuine need and extreme vulnerabilities from being able to access critical, life-transforming Head Start services.

We recommend using Area Median Income (AMI) instead of the FPL for Head Start eligibility determinations. AMI is a locally adjusted measure that more accurately reflects the wide variations in cost of living both across the country and within individual states. The working group firmly believes that is better suited as a measure of need than the current FPL. The Department of Housing and Urban Development uses AMI for program eligibility for a variety of income-based housing assistance programs such as Section 8. This shift could be accomplished by determining an appropriate percent of AMI such that children in the lowest 25th income percentile for each county would be eligible. A backstop income limit based on current law would ensure that no low-cost county would find their eligibility lower than it is now.

Eligibility based on Area Median Income would be based on where the family lives, a potentially complicating administrative detail for programs. However, programs would have the choice to maintain current income eligibility standards if they are a better fit.

While this proposal is designed to broaden the number of children eligible for Head Start, selection criteria would still play a critical role in further prioritizing those most in need of services, and enable programs to adapt to reflect unique community populations or issues.

Categorical Eligibility Recommendations

While there are many potential ways to expand Head Start categorical eligibility, the working group focused on those which addressed an unmet need, are able to be clearly defined, measured, and implemented, and are national (rather than local) in scope. We note that many potential categories of eligibility can instead be addressed through selection criteria.

Areas recommended as additional Head Start categorical eligibility² include:

- **SNAP:** Broadening Head Start eligibility to include those who qualify for SNAP would not be beyond the flexibility embedded in current law, defining SNAP as part of “public assistance.” This will allow eligible families to more easily access Head Start and will help programs serve more families and children, especially those who are already eligible but are either unaware they qualify or reluctant to go through an additional verification process to be eligible. It also underscores the critical links between nutrition support and Head Start for the most vulnerable. SNAP is a key piece of the larger nutrition puzzle for so many of the families served by Head Start.
- **Special Supplemental Nutrition Program for Women, Infants, and Children (WIC):** Making WIC-eligible families also Head Start eligible would help connect with pregnant women earlier and especially Early Head Start-eligible children earlier, reduce the paperwork burden, support the nutrition component of Head Start and Early Head Start, and help combat obesity in children.
- **Kinship care:** Many of the needs and challenges faced by kinship caregivers are directly related to the socio-demographic characteristics of both caregivers and related children. Common challenges facing kin caregivers include lack of preparedness, financial assistance, mental health and emotional support, and child care. Needs also depend on the reason for the kinship living arrangement, the kinship family's adjustment to the arrangement, and the types of supports the caregiver receives.

We recognize the challenges in defining informal kinship care, yet the need is often sudden, urgent, and compelling—truly a population Head Start was designed to serve. We recommend requiring the Office of Head Start to study and define “informal kinship care” and that eligibility be expanded to include this vulnerable population.

² Head Start currently uses two categorical eligibility criteria - (1) children experiencing homelessness as defined by the McKinney-Vento Act and (2) children in foster care.

Additional Recommendations

- **Eliminate the eligibility redetermination points between Early Head Start and Head Start, and for a third year of Head Start.** Head Start helps parents on their path to self-sufficiency, yet the required redetermination point between Early Head Start and Head Start disincentivizes modest increases in income and disrupts the continuity of care that research shows is critical for young children. With an ever-growing number of prenatal - age 5 grantees, an evolution we wholeheartedly support, enabling children to remain in Head Start up to kindergarten is not counter to Head Start's mission of serving the most in need; it is a fulfillment of the promise we make to children and families.
- **Eliminate the eligibility redetermination point between foster care and adoption.** In 2017, 54% of children ages 1-5 leaving foster care were adopted, a total of about 31,000 children.³ Continuity of care for this particularly vulnerable group is essential to helping both the child and the new adoptive parents manage the emotional and developmental well-being during a critical transition point.
- **Make AIAN children categorically eligible to attend Tribally-operated programs.** Head Start plays an important role in tribal communities, providing high quality early learning opportunities that are culturally and linguistically appropriate. Indian Head Start is unique because it helps fulfill the federal government's trust responsibility to protect the interests of tribal nations and communities. Expanded eligibility recognizes increased developmental vulnerability due to high rates of adverse childhood risk factors, native health disparities, historical trauma, and damaged cultural identity.
- Further consideration of the needs of the **migrant and seasonal communities** also need to be addressed as potential additions to this list.

For more information or to provide comment, please email us at govaffairs@nhsa.org.

³ Annie E. Casey Foundation, <https://www.aecf.org/topics/adoption>, accessed 6/30/21.