

Congress of the United States
Washington, DC 20515

December 17, 2021

The Honorable Xavier Becerra
Office of the Secretary
Department of Health and Human Services
200 Independence Ave, S.W.
Washington, DC 20201

Dear Secretary Becerra,

We are writing to you on behalf of children and families across the nation on a matter of urgent importance—improving access to the Head Start program.

As Head Start teachers welcome back children, they are witnessing the costs of a lost year: the effects of lost opportunities to socialize, stabilize, and become independent in age-appropriate ways. Needs are already great in our most vulnerable communities, and these needs have been exacerbated by the pandemic. Yet even as Head Start operates healthy, safe programs—supported by all of the lessons learned over the past eighteen months—many seats remain unfilled. We simply cannot leave slots empty and let these opportunities go to waste.

You are well aware of the powerful impact that Head Start leaves on children—boosting their social-emotional skills, cognitive abilities, long-term health, and nutrition, and creating a lifelong love of learning—and just how urgently those benefits are needed right now. Ninety percent of brain development occurs in the first five years of life, and children’s experiences in these years help shape them for the rest of their lives. If we do not reach the children in our most vulnerable communities with high-quality services, the long-term consequence could be a societal epidemic that is entirely preventable.

There is one change you could make right now that would create an enormous immediate difference. We are asking you today to temporarily accept Supplemental Nutrition Assistance Program (SNAP) eligibility as proof of Head Start eligibility, following the provisions in the Head Start Act (645(a)(1)(B)(i)) and Program Performance Standards (§1302.12(c)(1)(ii)) that prescribe eligibility for children whose families are “eligible for public assistance.”

In the past, the Office of Head Start has stated that only Temporary Assistance for Needy Families (TANF) and Supplemental Security Income (SSI) are considered public assistance in practice, but as neither the Act nor the regulations define the term “public assistance,” including SNAP in this definition is a decision within the Secretary’s authority. There is no need for regulatory change, and there are no costs associated with this modification. We encourage you to issue a Program Instruction Memorandum as soon as possible to state that the Office of Head Start will temporarily allow SNAP enrollment documentation as proof of eligibility through September 2022 to help address the increased food insecurities caused by the pandemic.

First, this simple change would facilitate enrollment for the 80 percent of SNAP recipients who already qualify for Head Start based on income under the federal poverty level but are either unaware of their eligibility or reluctant to undergo the process of proving their eligibility for Head Start after having already done so for SNAP. Second, the inclusion of SNAP would also increase Head Start eligibility to serve the smaller number of SNAP households that earn over the federal poverty level. This includes families in the increasing number of cities and states, such as California, where a single full-time minimum wage job places a family of four over the federal poverty level, putting Head Start out of reach for families who urgently need it.

Considering SNAP as public assistance would be a positive, permanent step that is within your authority as Secretary. It is also an urgently needed response to the pandemic that could first be implemented as a temporary change. Such a modification is important both for what it will and will not do:

- Including SNAP *will* facilitate enrollment for SNAP households that already qualify for Head Start on the basis of income but have not yet accessed the program.
- Including SNAP *will* support the enrollment of hard-working, low-income families who earn just above the federal poverty level yet still struggle with food insecurity and cannot afford other high-quality early care and education programs.
- Including SNAP *will not* increase costs. Head Start is not an entitlement program; funds are already set by the annual appropriation. Rather, this change will help ensure that the slots already funded are fully utilized to serve children and families.
- Including SNAP *will not* prevent Head Start programs from serving families with the greatest needs first, as the Head Start Act and Program Performance Standards require programs to set prioritization criteria. Inclusion of SNAP will not impact programs' ability to prioritize; rather, it will help some of the very same families—the ones already enrolled in SNAP—to access the Head Start program.

We urge you to consider the great needs of our vulnerable children, families, and communities still struggling with the pandemic. Your quick, decisive action will lead to both immediate and long-term advantages. Children only experience the rapid brain and social-emotional development of the first five years once, so the time to act is now.

Considering SNAP as public assistance will immediately allow additional families to access available Head Start slots and will help programs serve more families and children. This temporary modification will also allow the administration time to research the long-term feasibility of making SNAP a permanent inclusion in the definition of “public assistance” eligibility. Thank you for your attention and quick action.

Sincerely,



LUCILLE ROYBAL-ALLARD
Member of Congress

/s/ KAREN BASS
Member of Congress

/s/ JUDY CHU
Member of Congress

/s/ J. LUIS CORREA
Member of Congress

/s/ BARBARA LEE
Member of Congress

/s/ TED W. LIEU
Member of Congress

/s/ LINDA T. SANCHEZ
Member of Congress

/s/ BRAD SHERMAN
Member of Congress

/s/ NORMA J. TORRES
Member of Congress