



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

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June 23, 2021

The Honorable Xavier Becerra  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

**Dear Secretary Becerra:**

On behalf of the nationwide Head Start community, we write today to voice our strong support for the administration adding the Supplemental Nutrition Assistance Program (SNAP) to its definition of “public assistance” for the purposes of Head Start eligibility. This change would enable Head Start programs to recruit and enroll children and families who are struggling to recover from the devastating impacts of the COVID-19 pandemic and in dire need of support.

Head Start’s comprehensive services rarely come into view in as dramatic a fashion as they did at the start of the pandemic last year. Upon shutdown, an immediate and significant problem with food insecurity faced Head Start children and their families within weeks, arguably the first and most pressing issue Head Start leaders encountered last March. The fact that Head Start focuses on the whole child—and whole family—meant that programs were well positioned with partnerships and relationships in communities that they could build upon rapidly. This 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.

Head Start was last reauthorized in 2007, and much has changed in the 14 years since. The 2016 Program Performance Standards took a major leap forward in helping move Head Start into the future, but as we emerge from the pandemic without a current reauthorization, we urge the Administration to consider its authority to further modernize the program through executive action. We note that both Head Start’s mission to serve the most vulnerable, as well as selection criteria that help assess relative need among those eligible for Head Start, remain in place.

The Head Start Act Section 645(a)(1)(B)(i) prescribes eligibility for children whose “families are eligible or, in the absence of child care, would potentially be eligible for public assistance,” but does not define what is meant by “public assistance.” Nutrition assistance is one of the most essential forms of public assistance, supporting the healthy growth and development of children from at-risk backgrounds. While the Office of Head Start has traditionally included only Temporary Assistance for



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Needy Families (TANF) and Supplemental Security Income (SSI), we urge you to also include SNAP in the definition of “public assistance.”

In consideration of our request to add SNAP to the definition of “public assistance,” we also note the following:

- 80% of SNAP households across the country are already income-eligible for Head Start, but are often unaware that their children can access this valuable resource.<sup>[1]</sup>
- 48% of enrolled Head Start families are also enrolled in SNAP; this administrative change would save time, resources, and frustration by proving their eligibility just once instead of twice.<sup>[2]</sup>
- Hard-working families in a growing number of states, counties, and cities are finding that full-time minimum-wage employment can put their family just over the poverty guideline, limiting their access to Head Start while still qualifying for SNAP benefits.<sup>[3]</sup>

Children only experience the rapid brain and social-emotional development of the first five years once. Considering SNAP as public assistance 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.

Thank you for your leadership and for considering this proposal to improve Head Start’s ability to serve children and families in the greatest need.

Sincerely,

A handwritten signature in black ink that reads "Yasmina Vinci".

Yasmina Vinci  
Executive Director  
National Head Start Association

National Migrant & Seasonal Head Start Association  
National Indian Head Start Directors Association



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New England Head Start Association  
Region II Head Start Association  
Region III Head Start Association  
Region IV Head Start Association  
Region V Head Start Association  
Region VI Head Start Association  
Region VII Head Start Association  
Region VIII Head Start Association  
Region 9 Head Start Association  
Region X Head Start Association

Alabama Head Start Association  
Alaska Head Start Association  
Arizona Head Start Association  
Arkansas Head Start Association  
Head Start California  
Colorado Head Start Association  
Connecticut Head Start Association  
Delaware Head Start Association  
DC Head Start Association  
Florida Head Start Association  
Georgia Head Start Association  
Head Start Association of Hawaii  
Idaho Head Start Association  
Illinois Head Start Association  
Indiana Head Start Association  
Iowa Head Start Association  
Kansas Head Start Association  
Kentucky Head Start Association  
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Oregon Head Start Association  
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South Carolina State Head Start Association  
South Dakota Head Start Association  
Tennessee State Head Start Association  
Texas Head Start Association  
Utah Head Start Association  
Vermont Head Start Association  
Virginia Head Start Association  
Washington State Association of Head Start and ECEAP  
West Virginia Head Start Association  
Wisconsin Head Start Association  
Wyoming Head Start Association Inc

CC: Katie Hamm, Deputy Assistant Secretary, Office of Early Childhood Education  
Ann Linehan, Deputy Director, Office of Head Start



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[1] Kathryn Cronquist, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2019*. Alexandria, VA: USDA, Food and Nutrition Service, Office of Policy Support, 2021, [www.fns.usda.gov/snap/characteristics-snap-households-fy-2019](http://www.fns.usda.gov/snap/characteristics-snap-households-fy-2019), pg. 16, table 3.1

[2] Ruth Cosse, "Head Start Preschool Participants, Programs, Families, and Staff in 2016," CLASP, December 2017, [www.clasp.org/sites/default/files/publications/2017/12/2017\\_Head\\_Start\\_Fact\\_Sheet.pdf](http://www.clasp.org/sites/default/files/publications/2017/12/2017_Head_Start_Fact_Sheet.pdf). Based on PIR data.

[3] As of January 2021, three states, D.C., two counties, and five cities/metropolitan areas have enacted a minimum wage equal to or exceeding \$13.00/hour, which is the equivalent of a \$27,040 annual salary and higher than the 2021 poverty guideline for a family of four (\$26,500). More than 71 million people (22% of U.S. population) live in these locations. State data per Economic Policy Institute, "Minimum Wage Tracker," values as of January 7, 2021, [www.epi.org/minimum-wage-tracker/](http://www.epi.org/minimum-wage-tracker/). Cities/counties per UC Berkeley Labor Center, "Inventory of US City and County Minimum Wage Ordinances," November 13, 2020, [laborcenter.berkeley.edu/inventory-of-us-city-and-county-minimum-wage-ordinances/](http://laborcenter.berkeley.edu/inventory-of-us-city-and-county-minimum-wage-ordinances/). Populations per U.S. Census Bureau, "Population and Housing Unit Estimates Tables (Vintage 2019)," [www.census.gov/programs-surveys/popest/data/tables.2019.html](http://www.census.gov/programs-surveys/popest/data/tables.2019.html). Sites accessed 4/9/21.