



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

January 19, 2024

Office of Head Start
Attn: Director of Policy and Planning
330 C Street SW, 4th Floor
Washington, DC 20201

To Whom It May Concern:

We, the undersigned parents and caregivers of children who are or were in Head Start and Early Head Start programs, are excited to share our perspectives and thinking about the Notice of Proposed Rulemaking (NPRM) entitled “Supporting the Head Start Workforce and Consistent Quality Programming,” published by the Office of Head Start (OHS) on November 20, 2023.

Head Start and Early Head Start (which we will refer to as Head Start) has had a deep and lasting impact on our lives and the lives of our children. It has changed lives - providing our children with a safe, healthy, and fun space to grow, learn, and develop into the amazing people we know they will be. And it has saved lives – helping us escape domestic violence, move out of being unhoused, and get back on our feet after unplanned life events. All the while, Head Start has provided us with support for how to be the best parents/caregivers we can be. It is in that spirit that we come together to comment on the proposed set of changes.

This letter is a result of extensive discussions with the National Head Start Association (NHSA), our Head Start programs, and our state/regional Head Start associations. It represents the high level areas of excitement and concern that we identified in our discussions. We also support the comments of the NHSA that were signed by programs and other Head Start associations. We believe that Head Start is a national treasure and we urge you to treat it with care and attention as you consider changes that will impact future parents/caregivers who look just like us.

First, we want to commend the Administration on the good things in the proposed rule. We believe our Head Start staff (teachers, family service workers, bus drivers, program directors, health service workers, etc.) are real life heroes and they deserve to be compensated adequately and fairly for their work. We agree that mental health supports need to be improved and easily accessed by staff and by our children. We agree that keeping caseloads of family support staff as low as possible is a good thing that will only help us and our children. We support the changes around making family engagement services more accessible and modernizing how programs communicate with us. And we strongly support the proposed changes to eligibility that will factor in housing costs. We all know other parents/caregivers who could really benefit from Head Start’s services, but they make just a bit too much money.

However, while we support many of those provisions at a high level, we do not agree with the Administration trying to make these changes without providing the additional resources needed by our programs to be able to make these changes. It is the responsibility of the Administration and Congress to provide the funds needed for Head Start programs to do what research and our lived experience shows it does – disrupt poverty and change the life trajectory of our children and ourselves. **Any rule change that will require programs to reduce the number of children they are funded to serve should be immediately rejected.**

Head Start was created based on a concept of maximum community engagement with a major focus on involving and partnering with parents in all aspects of programming. That is why policy councils were created and remain such an important part of Head Start. However, this proposed rule without additional resources threatens the relationship between parents/caregivers, community members, and staff. Without additional resources, programs would be forced to choose between staff and the needs of parents and caregivers. It is a policy council member's duty to act in the best interest of their community and that means we must consider the needs of future children and families as well those currently in the program. Having to choose to eliminate access in order to pay staff and so meet the Administration's requirements will force policy council members and the program staff who administer the councils into an uncomfortable and possibly inappropriate position. It also disregards our own interests and our autonomy about how Head Start should operate in our communities. Again, we agree with many of the goals proposed, but urge you not to require programs to pursue them without adequate funding.

We believe that regulations in Head Start should be put in place first and foremost to make sure that our children are safe, healthy, and receiving the services promised to them under the Head Start Act.

Regulations should help clarify and improve services, not create additional barriers to entry for children, families, or providers. Of course, we understand that regulations can also be used to protect taxpayer resources and we support those as well.

Rather than allowing programs to focus on best serving the needs of children and families in each community, many of the proposed changes appear to require programs to follow a specific model or best practice. Others are focused on controlling certain aspects of local program operation due to political pressure and/or administrative oversight. A great example of this is in the proposal to require adult sized furniture in classrooms. We support the wellness of our staff, but classrooms are spaces for children and we worry that requiring programs to have larger desk chairs could be safety hazards for children. We believe that staff should have access to other rooms and spaces where desks, couches, and larger chairs are available. Other proposed changes that don't seem to clearly prioritize the safety, wellbeing, and outcomes of children are seen in the mental health services section, the staff health and wellness section, and the child safety and personnel policies reporting section. **Before making any of these changes, we urge you to consider the following question: will this change better protect children, improve outcomes for families, and make it easier for programs to meet their community's needs? If the answer is not an obvious yes, then the regulation should be reconsidered.**

Finally, we are deeply concerned that this proposed rule will make it far more difficult for local Head Start leadership to administer Head Start and we fear the overall ability for families to access services will suffer. Many sections in this proposal are incredibly and unnecessarily complicated, and will require programs to jump through all sorts of hoops to appease the federal government. This is deeply problematic to us. Of course, child safety and well being must be the top priority, but after that, program leadership should be working to innovate, build partnerships, expand their reach, and better serve the children, families, and staff in their programs. We are concerned that many of the proposed changes are an administrative overstep that will make program leaders more focused on accountability to bureaucratic requirements and processes rather than to outcomes for children and families. We urge the administration to maintain the approach of empowering program leaders and staff to make the right decisions for their programs, which can only be done without resorting to very prescriptive one-size-fits all rules from Washington.

In conclusion, we appreciate the opportunity to provide insight and comments on the proposed rule. We recognize that the Administration is attempting to address really big and challenging issues facing Head Start and that is commendable. But unfunded mandates and overly prescriptive regulations are not what Head Start needs. Instead, we believe that the best thing the Administration can do to protect and strengthen Head Start is to start working with Congress on reauthorizing Head Start. We are confident in saying this because our lives and those of our children have been transformed thanks to Head Start, and we want to see even more families benefit. Today's children and families, and future generations, deserve it.

Sincerely,

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Keily Nearhood

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Kayse Bosarge
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Eunice Cabral
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Ana María Romero
Teona Rose
Tatianna Ross
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Mylia Scott
Rosalin Scott
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Ashley Stilwell
Samantha Stilwell

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Courtney Colliet
Tienaya Godes
Jessica Goette
Stanley Harewood

Tanesha Strange
Doma'neke Strange
Ariell Strange
Brian Strange
Marcie Reynolds Strange
Joy Tuesday Strout
Brandie Violet Stultz
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Joann Tatum
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Kristian Thomas
Janeka Thomas
Todd A Thomas
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