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Office of Head Start
Division of Planning, Oversight, and Policy
330 C Street SW, 4th Floor
Washington, DC 20201

Reference: Docket Number: 2023-25038

RIN: 0970-AD01

Dear Director of Policy and Planning:

The Florida Head Start Association (FHSA) appreciates the opportunity to respond to 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, seeking comments to updating the Head Start Program Performance Standards (HSPPS).

As an association representing 133 Grantee Recipients in Florida serving over 42,000 children and families, we prioritize talking and listening to our members to learn how these proposed rules directly impact their day-to-day lives and the families they serve. I had the pleasure of attending the OHS roundtable discussion on December 15, 2023, in Atlanta with a few of our members, and what I learned that day was that OHS should have hosted these roundtables to hear directly from Grantee Recipients who are doing the work to help craft new standards that could be genuinely beneficial and improve the quality of the Head Start programs. Instead, we are left with an NPRM riddled with unfunded mandates. The time we were provided to respond to the NPRM was rushed since it was released on the cusp of the holiday season. We encourage OHS to take a more extended period of time to intentionally engage the Head Start community on what the Head Start program should look like moving into the future.

FHSA supports the comments submitted by the National Head Start Association. However, we would like to elevate a few specific concerns we have that are presented in this NPRM.

With increasing homelessness, childcare deserts, and food insecurity, Head Start is needed more than ever.

In Florida, there are over 250,000 children under six living in poverty. Currently, Head Start programs in our state can only serve 17% of these children. To fund what is being proposed in the NPRM, Head Start programs would have to cut slots and put these 17% of children at risk of losing their current services, and the program would lose relevancy in their communities. We implore Congress to strengthen Head Start by reauthorizing the Child Care and Development Block Grant Act to ensure Head Start Grantee Recipient receives this funding as opposed to going directly to the states in addition to increasing funding to Head Start current federal to local funding communities. We implore Congress to strengthen Head Start by reauthorizing the Child Care and Development Block Grant Act to ensure Head Start Grantee Recipient receives this funding as opposed to going directly to the states in addition to increasing funding to Head Start current federal to local funding model to implement these changes in this NPRM. communities. We implore Congress to strengthen Head Start by reauthorizing the Child Care and Development Block Grant Act to ensure Head Start Grantee Recipient receives this funding as opposed to going directly to the states in addition to increasing funding to Head Start current federal to local funding model to implement these changes in this NPRM.

§1302.90(e)(1) (2) Pay Scale for All Staff

Childcare workers are among the lowest-paid professionals. Of course, we support the proposed change towards pay parity for teachers and all staff. However, to ensure that Head Start teachers and staff receive an annual salary that is at least comparable to the annual salary paid in the public school setting will only diminish the Head Start program. In Florida, the state invested \$1.1 billion, an increase of \$252 million, to raise salaries for new and veteran teachers. Since 2020, Florida has invested over \$3 billion to increase teacher pay. Wages in school districts will continue to rise. How will Florida Head Start programs keep up with this trajectory? Head Start and the public school district structures are entirely different. This is like comparing apples to oranges. Head Start programs in Florida will have to serve fewer children and families to meet this requirement. There are better ways to get to pay parity than reducing slots and putting Head Start into extinction. Have you considered this rule's ramifications on our Child Care Partnerships? The OHS needs to step back and individualize its approach to meet each Head Start grantee recipient's unique circumstances within the context of their local grantee and community.

§1302.90(f) Staff benefits

FHSA supports providing sufficient benefits for all Head Start staff; these excessive changes remove Head Start Grantee recipients' flexibility to make essential business decisions on running their program in their communities. Has OHS looked into categorizing Head Start staff as federal employees to have access to those benefits?

§1302.21 Center-based ratios

We have heard from Grantee Recipients the number of children experiencing behavioral concerns and social-emotional challenges has significantly increased over the past few years. We ask OHS to look closely at class sizes and ratios as we feel that goes hand in hand. We encourage OHS to allow programs as much flexibility as possible to reduce class sizes and ratios where appropriate. One idea is to limit class sizes and ratios when a classroom has a certain percentage of children on IEPs or with behavioral concerns. Programs must be given the flexibility to temporarily reduce enrollment in classrooms with significant needs to increase ratios without impacting the Full Enrollment Initiative. Health and safety concerns within classrooms must be prioritized above enrollment.

§1302.12 Determining, verifying, and documenting eligibility

Allowing Head Start programs to adjust the gross income calculation for eligibility purposes to account for excessive housing expenses is a great idea; however, we feel this could place an administrative burden on Head Start programs, families, and the Regional Office, as additional documentation would be necessary. Adopting a more localized approach is a better alternative since housing costs in Florida vary significantly in our state. Why not make families receiving WIC benefits categorically eligible for Head Start services?

§1302.14(b) Children eligible for services under IDEA

Head Start programs are seeing an increase in children with significant needs and diagnosed disabilities. For Head Start programs to provide these children with therapeutic classroom environments for them to thrive requires additional funding. OHS should consider providing programs with a waiver to reduce class size while fulfilling their Full Enrollment requirements. The public school system receives federal appropriations through parts B and C, in which Head Starts are not provided additional funding to support these children.

§1302.47(b)(5) Safety Practices

We understand and support the effort to create healthy and safe environments for children in Head Start and Early Head Start programs. However, the expansion of reportable incidents in this section is concerning and does need to align with the Department of Children and Families as they are the primary agency in Florida for investigating potential child maltreatment claims. The language in 1302.102(d) regarding significant incidences needs to be more specific and could result in substantial overreporting. We urge OHS to consider language regarding reporting and safety that implies trust in Head Start programs and their safety procedures. We realize and appreciate the hard work OHS put into drafting the NPRM and its attempt to be responsive to the need to pay our teachers and staff fair salaries. When speaking with our members, it's clear that the scope of reductions needed to meet many of the salary and benefit requirements in the NPRM without additional dollars would be a harsh, unfunded mandate and catastrophic to Head Start and the families we serve. This approach is vehemently opposed by our membership—in particular, Head Start parents concerned with family members, neighbors, and community members not being able to access Head Start in the future with such a deep contraction in the number of children served. You will receive comments from Head Start programs in Florida with more specificity regarding the direct impacts the NPRM will have on their programs.

Thank you for considering the above comments in response to the NPRM. If you have any questions or require further clarification or additional information, don't hesitate to contact me directly at Wanda@FLHeadStart.org.

Sincerely,

Wanda Minick

Wanda Minick
Executive Director