

# SNAP and Head Start Eligibility

## ACF-IM-HS-22-03

### Head Start Grant Recipient Webinar

April 25, 2022



**Office of  
Head Start**

*Head Start Work Is Heart Work*



## Housekeeping

- ☐ All participants are in listen - only mode.
- ☐ Participate in discussion and ask questions via chat.
- ☐ Webinar will be recorded and available on ECLKC
- ☐ Slides will be available on ECLKC



## Today's Speakers

- ❑ Dr. Bernadine Futrell, director, OHS
- ❑ Catherine Hildum, senior policy analyst, OHS
- ❑ Heather Wanderski, Program Operations Division director, OHS



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## ACF-IM-HS-22-03: Head Start Categorical Eligibility for Families Eligible for SNAP

- ❑ ACF-IM-HS-22-03 adds SNAP eligibility to our definition of public assistance to determine recipients as eligible for Head Start programs.
  - SNAP: Supplemental Nutrition Assistance Program
- ❑ SNAP recipients are now eligible for Head Start services but are not guaranteed a spot. Programs must rely on their selection criteria to prioritize those most in need of services for enrollment.



## Who is impacted by adding SNAP?

- ☐ 80% of SNAP recipients are living under 100% poverty guidelines and are already income-eligible for Head Start
- ☐ 500,000 families receiving SNAP are above poverty, mostly families with incomes from 100 to 130% poverty guidelines
- ☐ Most families receiving SNAP are already eligible, but this policy makes it easier for them to enroll and operationalizes the flexibility in the Head Start Act in a clear manner.
- ☐ Newly eligible SNAP recipients are not guaranteed a spot in a Head Start program. Programs must rely on their selection criteria to prioritize those most in need of services for enrollment.



## ACF-IM-HS-22-03: Head Start Categorical Eligibility for Families Eligible for SNAP

- ❑ Adding SNAP addresses barriers to participation in Head Start and supports the goals of President Biden's *Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*.
  - Reduces the challenge for families of navigating multiple federal program eligibility processes
  - Supports better alignment and coordination across federal public benefit programs
- ❑ This policy change allows Head Start programs to
  - reach additional families many of whom are already eligible
  - minimize the burden on families seeking public assistance
  - coordinate federal benefit programs for families who are eligible



## Head Start Eligibility Criteria

- ☐ income is **equal to or below the federal poverty level**
- ☐ eligible **for public assistance** (*TANF, SSI, SNAP*) ***SNAP ADDED by ACF-IM-HS-22-03***
- ☐ the child is **experiencing homelessness or in foster care**

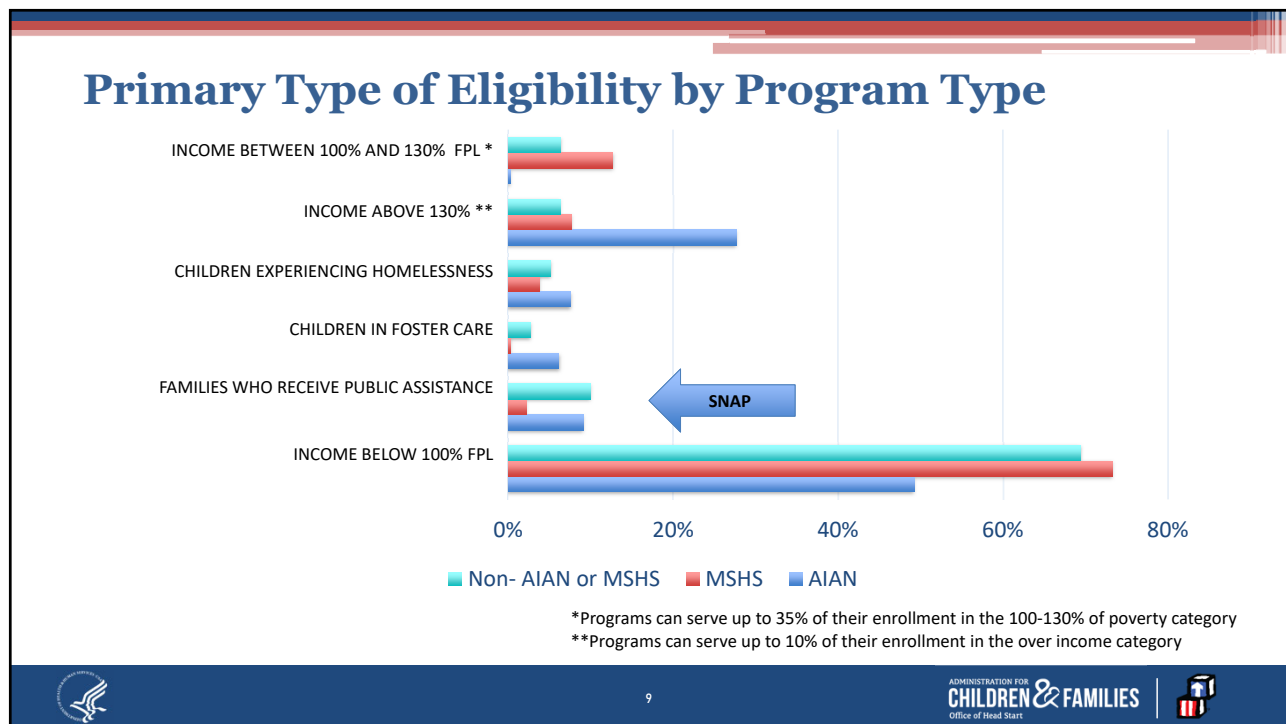
### **Additional flexibility:**

**10% of slots can be used for children who do not meet any eligibility requirement;** programs use this for over-income children who could benefit (e.g., children with disabilities).

**35% of slots can be used for children under 130% of poverty;** programs must document outreach efforts to ensure they first meet the needs of eligible families.







## Advancing Equity through Head Start Enrollment

- ❑ Head Start's historic mission, through its eligibility criteria, is to serve communities that have suffered from long-standing systemic issues such as inequity, bias, racism, and institutional barriers.
- ❑ This guidance aligns with Head Start's mission and with the ACF Strategic Plan to advance equity by reducing structural barriers to programs and promoting innovation within ACF and between federal agencies.
- ❑ Grant recipients will continue to follow all eligibility, recruitment, selection, and enrollment requirements and their program policies and procedures to ensure those who can benefit most from comprehensive early childhood development services are prioritized for Head Start enrollment.



## Implementation of SNAP IM

- ☐ Statutory eligibility requirements in Sec. 645 of the Head Start Act remain the same
- ☐ All **E**ligibility, **R**ecruitment, **S**election, **E**nrollment and **A**ttendance (ERSEA) requirements at 45 CFR § 1302 Subpart A remain the same.
- ☐ Programs must continue to ensure they enroll children and families most in need of services in their communities (45 CFR § 1302.13)
- ☐ To verify SNAP receipt or potential eligibility, programs must examine and maintain documentation from state, local, or tribal public assistance agency (45 CFR § 1302.12(i)(2)).
  - a copy of SNAP notice of approval
  - other documentation of eligibility or benefits from the SNAP agency, or
  - an Electronic Benefit Transfer card with SNAP ID number



## Updating policies and procedures

- ☐ A program's policies and procedures may need to be updated to ensure their eligibility determinations are meeting all the requirements under 45 CFR § 1302 subpart A.
- ☐ Annual review of the community needs assessment at 45 CFR § 1302.11(b) is an opportunity to determine whether ERSEA procedures need to be updated. However, updates can happen any time necessary.
- ☐ Programs may also examine community partnerships and outreach efforts for ways to encourage SNAP recipients to apply for Head Start services.



### **Why is the Administration for Children and Families (ACF) including Supplemental Nutrition Assistance Program (SNAP) benefits in Head Start eligibility criteria at this time?**

President Biden's *Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government* requires federal agencies to reduce the challenge of navigating multiple eligibility processes and support better alignment and coordination across federal public benefit programs.

ACF is expanding its interpretation of public assistance because the current, narrow interpretation does not capture many families who are already eligible for Head Start programs. The majority of households with young children who receive SNAP benefits have incomes below 100% of poverty.

Currently, these families must document their income eligibility for both SNAP and Head Start programs, which can cause unnecessary burden to both families and Head Start grant recipients.

Reducing this administrative burden to qualify for multiple federal services will allow programs to reach more families in need.



### **Will this make higher income children eligible for Head Start programs?**

Head Start programs can consider SNAP recipients as eligible for their programs.

Though SNAP has a higher income threshold for eligibility than the Head Start program, a majority of SNAP recipients are already eligible for Head Start programs based on their income level.

While there are some households who receive SNAP benefits with incomes higher than 130% of the federal poverty level, data shows that number is relatively small. The inclusion of SNAP benefits as public assistance will expand the pool of eligible participants in Head Start programs for these households.

Programs are required to continue to enroll and serve the most vulnerable in their communities based on their selection criteria.



**Why does this IM add SNAP public assistance for Head Start categorical eligibility and not the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) assistance?**

- ❑ The sole purpose of this IM is to make clear that programs can consider SNAP as “public assistance” for purposes of determining Head Start eligibility. While the SNAP income-based eligibility threshold of 130% of federal poverty guideline is slightly higher than income-based Head Start eligibility, the inclusion of SNAP as public assistance is unlikely to substantially expand the number of Head Start participants with incomes exceeding 100% of poverty.
- ❑ The WIC income eligibility level is up to 185% of the federal poverty guideline, which is higher than the income-based eligibility for the Head Start program and SNAP. Furthermore, the number of households receiving SNAP with both children under 5 and above the 130% of federal poverty guideline is much smaller than the similar group receiving WIC benefits. Based on data available, an estimated 150,000 households receiving SNAP with children under 5 had incomes above 130% of the federal poverty guideline compared to an estimated 900,000 children under 5 participating in WIC with household incomes above 130%.



### **Do programs need Regional Office approval to consider SNAP benefits as public assistance?**

No, programs do not need approval to include SNAP benefits in the interpretation of public assistance. Programs must continue to prioritize those most in need for enrollment and adhere to selection criteria and program policies and procedures that are based on community needs according to 45 CFR § 1302.13.





### When does the IM take effect?

This IM goes into effect immediately. Programs can move forward in updating their program policies and procedures on eligibility determinations to enroll or add to wait lists children in households receiving SNAP benefits.



## How should programs verify families receive SNAP benefits?

To verify a family's receipt of SNAP benefits as potential eligibility for the Head Start program, staff need to examine and maintain a copy of documentation from the state, local, or tribal public assistance agency as required in 45 CFR § 1302.12(i)(2). For example, a family could present a copy of notice of approval, other documentation of eligibility or benefits from the SNAP agency, or an Electronic Benefit Transfer (EBT) card with SNAP ID number to be eligible for Head Start services.



## How should programs record SNAP eligibility determinations in program files?

Head Start grant recipients must maintain an eligibility determination record for each participant in the program, as required in 45 CFR § 1302.12(k). Each record should indicate whether a child was deemed eligible through SNAP, income, or another category. Programs maintain copies of documentation used to verify eligibility in each child's file as part of the required eligibility determination record.



### **Will this ACF guidance allow programs to enroll more children?**

No, including SNAP benefits as public assistance for Head Start eligibility determinations will not increase a program's funded enrollment. However, it may allow programs to find additional eligible families to add to their waitlist or fill any vacant slots.



## Thank you!

- ☐ Thank you for participating in today's webinar
- ☐ IM and Materials can be found here:  
<https://eclkc.ohs.acf.hhs.gov/blog/expanding-head-start-services-snap-recipient>
- ☐ Contact OHS Regional Office with questions
- ☐ Send questions to <https://eclkc.ohs.acf.hhs.gov/contact-us>



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