

From: [Kowall, Emily \(ACF\) \(CTR\)](#)
To: [InfoCollection \(ACF\)](#)
Cc: [Escobar, Jesse \(ACF\)](#)
Subject: Public comments on proposed HSCO application and scope
Date: Tuesday, August 11, 2026 4:52:47 PM

Hi Molly,

Our team received the comment below on the HSCO Grant Application PRA package – we wanted to send this to you so that it can be documented through the PRA process. Please let me know if there is anything you need from me on this.

Thank you!
Emily

From: Tracy Duarte <tradua@pakeys.org>
Sent: Wednesday, August 5, 2026 10:57 AM
To: Shamim, Omair (ACF) (CTR) <Omair.Shamim@acf.hhs.gov>
Subject: Collection of comments on proposed HSCO application and scope

Hi Omair – as promised, I’ve collected comments from some of the HSCO’s. I told Shawna that I’d share them with her when I received them so if you could pass these along to her, I’d appreciate it.

Thanks so much!

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As states continue to align Head Start across the early childhood care and education system, there is significant value in explicitly recognizing the Collaboration Office as the systems building entity. These proposed revisions to the objectives of the Collaboration Office presents and important opportunity to strengthen the integration of HS while also preserving its distinct federal role.

If the Office of Head Start envisions a broader evolution of the Collaboration Offices statutory responsibilities; it would be beneficial to acknowledge that certain changes may ultimately require congressional consideration of the Head Start Act. Clarifying long-term federal vision for the office and the extent to which Congress may have an appetite to modernize the statutory framework would help states with the true elevation of the office as a leader in the broader state ecce system.

Placement in the state governance structure:

Location of HSCO positions varies greatly within state systems. Moving a position into the level of decision making in some cases would require reclassification of positions and possibly require an increase in pay from the state perspective. HSCO grants have been level-funded and without specific funding allocated for this, this could be a serious financial strain on already maxed-out budgets.

Describe how your state will ensure the strategies above advance the state's priorities and Governor's vision for ECE, are driven by the State Advisory Council, and are led by the State Collaboration Director alongside other ECE decisionmakers in the state.

To ensure and empower states to fulfill many of the new application requirements, it would be very helpful to have a branded OHS and CC joint policy statement, similar to the DHHS and US DOE Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs with a shared specific vision, language from the Head Start Act and other related acts/federal guidance, and clear recommendations for increasing collaboration and coordination as outlined in CCDF and HSCO applications.

One concern I have throughout the proposed application is that the language seems to assume that every state has the same governance structure, level of access to the Governor's office, and ability to position the HSCO as a lead ECE decisionmaker. I think it would be important for the application to allow for state variation and recognize that the role and authority of the HSCO can look very different depending on the state's governance structure.

Objective 1 – Unified State Governance:

The application appears to assume that each state has a clearly identified State Advisory Council that directly engages with the Governor's office. In some states, early childhood governance is more complex and responsibilities are shared across multiple agencies and entities. The application should allow states to describe their existing structure and how the HSCO contributes to that structure rather than requiring states to establish or redefine governance in a particular way.

Some state early childhood governance is intentionally cross-sector and does not fit neatly into a single State Advisory Council structure.

Some state early childhood work involves multiple state agencies, programs, and partners. The application should allow these states to identify the existing entities and structures that collectively perform the functions of a State Advisory Council rather than requiring the state to designate or create one entity solely to meet the application requirement.

Objective 2 – Strong Head Start Leadership:

I support strengthening the HSCO's voice and ensuring that Head Start is represented in statewide ECE decision-making. However, the expectation that the State Collaboration Director become a "lead ECE decisionmaker" and directly support the Governor's office may not be within the authority of the HSCO or the position itself in every state. The HSCO can be a strong convener, connector, and subject-matter resource without necessarily having decision-making authority. I would encourage language that recognizes the HSCO's role in influencing and informing statewide decisions while allowing each state to determine the appropriate placement and authority within its own structure.

I also have some concern with requiring specific state leaders to sign off on decisions regarding the HSCO's role. In some states, the HSCO may not have the authority to obtain that level of formal approval, particularly when the position is housed within an agency with its own organizational structure and leadership.

Objective 3 – Statewide ECE Decisions:

I strongly support meaningful integration of Head Start into statewide early childhood planning. However, I think the application should recognize that Head Start is a federally funded program with federal requirements, program governance, and locally operated grantees. Meaningful integration should not necessarily mean that Head Start is embedded into every state decision-making structure in the same way as state-funded programs.

I would encourage the application to focus on the HSCO's ability to build relationships, bring the Head Start perspective to statewide conversations, identify opportunities for alignment, connect Head Start programs with state initiatives, and help move partners from consultation to coordinated action, while allowing states flexibility in how that is accomplished. States have established relationships and cross-agency structures that support early childhood coordination. The application should allow states to demonstrate how existing structures are functioning and where they may be strengthened rather than creating a prescriptive governance model.

Overall, I support the intent behind strengthening Head Start's voice in statewide ECE systems. My primary concern is that the application needs more flexibility to account for the significant differences in state governance structures, agency authority, and the placement of the HSCO role. A successful application should allow states to demonstrate how they will achieve the intended outcomes within their existing structure rather than requiring states to create a specific governance model or role that may not be feasible under state law or organizational authority.

I strongly support efforts to elevate the role of Head Start within state early childhood systems and to strengthen cross-sector leadership. Head Start should be a full partner in statewide early childhood decision-making. However, several aspects of the proposed

scope of work would benefit from clarification to ensure they remain consistent with the statutory purpose of the Head Start Collaboration Office and preserve the unique federal-state partnership that has made the Collaboration Office successful for nearly three decades.

1. Preserve the HSCO's Federal Mission

Throughout the proposed narrative, the role of the State Collaboration Director is framed primarily as supporting the Governor's vision and state priorities. While collaboration with Governors and state leadership is essential, the HSCO is fundamentally a federally authorized position established under the Head Start Act to improve coordination between Head Start agencies and state systems.

The scope should explicitly recognize that the State Collaboration Director has dual responsibilities:

- advancing Head Start priorities established by the Office of Head Start;
- representing the interests and expertise of local Head Start and Early Head Start grant recipients;
- and helping align those priorities with state initiatives whenever possible.

Without this balance, there is a risk that the HSCO becomes viewed primarily as a state policy position rather than the independent collaborative bridge envisioned in federal statute.

2. Avoid Making the HSCO Solely Accountable to the Governor's Agenda

The proposed objectives repeatedly reference advancing the Governor's vision for early care and education.

Governors understandably change priorities over time, and those priorities vary significantly across states. Head Start, however, provides a stable national framework focused on comprehensive services, school readiness, family engagement, health, disabilities, mental health, and serving children experiencing the greatest need.

The Collaboration Office should help connect state priorities with the Head Start mission—not subordinate one to the other.

Language recognizing this shared responsibility would strengthen the guidance.

3. Recognize Multiple Governance Structures

The proposal assumes that every state has a clearly defined State Advisory Council serving as the central governing body for early childhood.

Many states operate through multiple collaborative governance structures, executive committees, workgroups, advisory councils, and interagency partnerships rather than a single decision-making entity.

The scope should allow states flexibility to demonstrate how collaboration occurs across multiple governance structures rather than requiring a single council to serve as the primary vehicle.

4. Align Expectations with the Authority of the State Collaboration Director

The proposed narrative places considerable emphasis on the State Collaboration Director serving as a "lead decisionmaker" and leading statewide early childhood priorities alongside other senior state officials. It also appears to assume a level of authority and organizational standing that exists in only a small number of states. Without corresponding changes in organizational placement, compensation, supervisory authority, or statutory authority, many State Collaboration Directors will be evaluated against expectations they are not empowered to meet.

While this is an admirable goal, it does not reflect the governance structure in many states. Most State Collaboration Directors do not have the statutory authority, organizational placement, supervisory responsibility, or fiscal authority necessary to function as lead decisionmakers within state government. Unlike State Child Care (CCDF) Administrators or other senior agency executives, State Collaboration Directors typically do not oversee large state-funded programs or budgets, nor are they positioned within state government at an executive level that routinely participates in high-level policy decisions.

The federal Head Start Collaboration Office grant provides relatively limited funding and does not establish the organizational authority needed to direct statewide policy. As a result, many State Collaboration Directors are not routinely included in executive-level decision-making forums where major early childhood policies and investments are developed.

Rather than assuming this level of authority already exists, the scope should recognize the realities of state governance and focus on ensuring that State Collaboration Directors have meaningful opportunities to inform policy, contribute Head Start expertise, convene cross-sector partners, and influence decision-making. If ACF intends for State Collaboration Directors to serve as true statewide early childhood leaders, additional guidance regarding organizational placement, authority, and expectations for state engagement may be necessary.

The Collaboration Office has historically been most successful not because it directs state policy, but because it serves as a trusted convener, relationship builder, and systems leader. Strengthening that role while increasing access to decision-making processes is likely to produce more meaningful and sustainable improvements than establishing expectations that exceed the position's current authority in most states.

5. Expand the Definition of Meaningful Integration

Objective 3 appropriately seeks to move beyond simple consultation. However, the examples provided focus heavily on traditional early childhood systems such as child care, financing, workforce, and preschool alignment.

Head Start's value extends far beyond these systems.

The guidance should explicitly encourage integration with:

- health care;
- behavioral and infant/early childhood mental health;

- housing and homelessness;
- child welfare;
- Early Intervention;
- family economic supports;
- nutrition;
- maternal and infant health;
- community action agencies;
- and other family-serving systems.

These partnerships reflect the comprehensive service model that distinguishes Head Start from other early childhood programs.

6. Recognize Existing State Differences

States differ dramatically in governance structures, funding systems, political leadership, and administrative organization.

A successful Collaboration Office in one state may operate differently from another while still fully achieving the federal objectives.

The application should emphasize outcomes rather than prescribing organizational structures or reporting relationships that may not be feasible in every state.

7. Maintain the HSCO's Role as a Neutral Convener

One of the Collaboration Office's greatest assets is its credibility with both state agencies and local Head Start programs.

The HSCO succeeds because it serves as a trusted, neutral convener capable of bringing together agencies that might otherwise operate independently.

The final scope should preserve this unique role by ensuring the Collaboration Director remains positioned to facilitate collaboration across agencies rather than becoming viewed primarily as representing one governmental entity or policy agenda.

Conclusion

The proposed scope appropriately recognizes that Head Start should play a more central role in statewide early childhood systems. I strongly support elevating the visibility and influence of Head Start within state policy.

At the same time, the final guidance should preserve the unique statutory purpose of the State Head Start Collaboration Office as a federally authorized collaborative leadership position that serves as a bridge among federal, state, and local partners. Maintaining this balance will allow Collaboration Offices to continue advancing both national Head Start priorities and state early childhood goals while remaining trusted leaders across systems.

Objective 2

- The "sign-off" requirement is problematic. The guidance conflates influence and coordination with formal authority and state-government placement. Flexibility on placement, including at a non-traditional placement, allows HSCO to serve as trusted conveners across agencies, sectors, and administrations. The "who signed off" requirement is vulnerable because it assumes a governance authority and may inadvertently encourage states to politicize or restructure positions that are currently effective.
- The requirement that states describe how the State Collaboration Director will maintain "ongoing communication with the Governor's Office" may not align with the governance structure of all State Collaboration Offices. In many states, communication with executive leadership occurs through established interagency partnerships, advisory bodies, cabinet-level officials, or designated agency leaders rather than through direct and ongoing communication between the Collaboration Director and the Governor's Office. The guidance should recognize multiple effective pathways for informing executive decision-making

Objectives 2 and 3

- The guidance would benefit from greater flexibility regarding the expectation that states focus exclusively on decisions focused primarily on the Governor's vision/state priorities for early childhood education. While alignment with state priorities is important, meaningful integration of Head Start often occurs through long-standing partnerships, community-driven initiatives, cross-sector collaboration, and federally required coordination efforts that may not be directly tied to a particular administration's agenda. The final guidance should allow states to identify strategies that advance broader early childhood system goals, improve outcomes for children and families, strengthen cross-sector alignment, and support sustainable systems-building efforts. This flexibility would better recognize the diverse governance structures under which Head Start Collaboration Offices operate and would support continuity across administrations while preserving opportunities for innovation and responsive collaboration.** Consider revising the language to encourage alignment with state priorities where appropriate while also allowing states to highlight significant Head Start integration strategies that emerge from stakeholder engagement, state/community needs, and established early childhood partnerships. Framing this way sends a message that Head Start integration should be guided by enduring systems goals and collaborative partnerships and emphasizes sustainability, flexibility, and system coordination.

The draft instructions focus on three statewide governance objectives that, in many states,

are not directly within the HSCO's operational control or authority. Specifically, expectations involving State Advisory Council (SAC) functionality, statewide early childhood governance structures, and Governor's Office engagement may be shaped by decisions made outside of HSCO influence. While these expectations reflect the "sufficient authority" language in Section 642B of the Head Start Act, states vary considerably in how authority, decision-making, and cross-agency coordination are structured. For example, my state does not have an SAC but has devolved its various functions across several agencies. Neither does our governor, who is term-limited and set to be replaced in the next electoral cycle, have a declared "vision for early care and education."

Further, statements such as "steps your state will take," "how ... the State Collaboration Director's role will be created anew, adapted, and/or strengthened," and "how your state will ensure the strategies above advance the state's priorities and Governor's vision for ECE, are driven by the State Advisory Council, and are led by the State Collaboration Director alongside other ECE decisionmakers in the state" outline functions beyond the scope of HSCO authority but also represent fundamentally unfunded mandates.

The draft grant application places responsibility for cabinet-level efforts and decisions on individuals who are often below the managerial/supervisory level within their respective state governments. In my state, I would have to supervise 3-5 workers to move beyond my current bureaucratic category. It is self-evident why I am unable to dictate actions my state will undertake. Thus, the language of the draft grant application threatens my livelihood simply because of where I am situated within my state.

Tracy

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