



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

August 11, 2026

Office of Head Start
Administration for Children and Families
U.S. Department of Health and Human Services

Re: Proposed Information Collection Activity: Head Start State Collaboration Office Grant Application

To Whom It May Concern:

The National Head Start Association (NHSA) appreciates the opportunity to submit comments in response to the Notice of Proposed Rulemaking (NPRM) published by the Administration for Children and Families (ACF) in the Federal Register on June 12, 2026 ([FR Doc. 2026-11882](#)).

Dedicated to the belief that every child possesses the potential to succeed, NHSA has championed policies since 1974 that guarantee eligible children access to Head Start's comprehensive support model. Representing nearly 700,000 children and families, 250,000 staff members, and 1,600 grant recipients nationwide, NHSA shares ACF's commitment to expanding service access and maintaining program quality while navigating modern operational pressures. The Head Start State Collaboration Offices (HSCOs), with intentional and effective support, are an integral part of achieving that.

Supporting the Essential Role of Head Start State Collaboration Offices

The 2026 grant transition toward "Unified State Governance" rightly positions HSCOs as crucial facilitators of cross-sector alignment. Framing Objective 1 around Early Learning Advisory Councils reinforces the statutory authority of HSCOs within broader state policy structures. However, while streamlined administrative requirements – such as reducing application prompts from 60 to 20 pages – are welcome, this narrative simplification must not dilute the distinct identity and standards of Head Start and the HSCOs in states.

The 2026 application consolidates specialized priority areas into three objectives; HSCOs will need to be provided the operational capacity to fulfill their leadership role in assisting states to reach these objectives. The "Reducing Federal Burden for Head Start Programs" NPRM on the Head Start standards indicates the Federal Government's desire to have states play a larger role in determining how Head Start is administered. This will likely mean HSCO offices will have even more duties that will need to be filled.

Head Start Collaboration Office Grant Objectives

We recognize and support the efforts to raise the position and influence of the HSCOs. The high-level objectives make sense, but we are concerned about the HSCOs having sufficient authority and capacity to meet these objectives.

The Head Start Collaboration Office grants three key objectives:

1. **Unified state governance:** Support an effective, functioning, cross-sector State Advisory Council on Early Childhood Education (ECE) that helps drive the state priorities, Governor's vision for ECE, and statewide decisions to advance that vision.
2. **Strong Head Start leadership:** Empower the State Director of Head Start Collaboration to be a leading partner in the statewide ECE decision-making structure.
3. **Statewide vision for ECE:** Integrate Head Start into all priorities, policies, and initiatives that advance the state priorities and Governor's vision for ECE.

Administrative Vision and Authority

To secure the long-term efficacy of the HSCO model, ACF needs to address critical operational elements:

- **Executive placement and authority:** Asking where the Director is positioned within state governance is an important step, but placement alone is insufficient. HSCO Directors must possess genuine executive authority and direct lines of communication to key decision-makers rather than being subordinated within lower-level administrative hierarchies. HSCO offices need states to require that their Child Care and Development Fund (CCDF) Lead Agencies engage in authentic planning and budgeting with their HSCO counterparts.
- **Operational sustainability:** Mitigation of high turnover among HSCO leadership requires clear federal provisions for competitive compensation structures alongside requirements that host agencies supply adequate matching funds and operational infrastructure. Annual federal award amounts for HSCO grants (\$125,000 to \$225,000) have remained flat since 1990, creating immense strain on office capacity relative to today's complex ECE landscape. Due to fiscal restraints, in many HSCOs, directors have additional responsibilities (i.e., state quality rating and improvement system [QRIS] system, Prek administration). This weakens their ability to represent the best interests of Head Start since there are often conflicting opportunities, interests, and opinions between the Head Start community and the state systems.
- **Preservation of State Association engagement:** Unlike the 2023 grant guidelines, the 2026 application omits explicit requirements for documentation demonstrating State Head Start Association involvement in selecting HSCO leadership and determining office direction. We strongly encourage the administration to reinstate and enforce these explicit partnership mechanisms.

Contextual Challenges and Governance Dynamics

As state-funded ECE and universal pre-K programs continue to expand, requiring gubernatorial sign-off on the HSCO Director's role (Objective 2) ensures Head Start retains a seat at high-level policy tables. Effective collaboration requires mutual commitment. While the proposed application mandates that HSCO Directors support gubernatorial priorities, it lacks reciprocal obligations for states to commit corresponding resources or formal authority back to Head Start programs. States must be required or incentivized to reciprocate support from child care, health, educational, and other systems in order to ensure effective coordination and collaboration with Head Start. This is an essential role for states requiring systems to create coordination and collaboration agreements and honor them.

The Head Start Act (Secs. 642B [42 U.S.C. 9837b] & 643 [42 U.S.C. 9838]) requires that HSCOs be

politically neutral and program focused. We ask that the Office of Head Start (OHS) honors the Act by explicitly preserving HSCO neutrality and standards, both in the HSCO grants and in guidance.

The Grants and Guidance

The requirement that states 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 State Collaboration Director and the Governor's Office. The guidance should recognize multiple effective pathways for informing executive decision-making.

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 ECE. 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 HSCOs 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.

Data: Collection, Access, Sharing, and Reporting

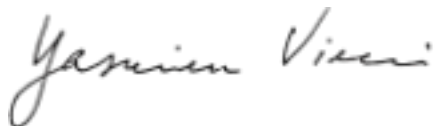
Finally, the proposed application framework requires clearer guidance regarding data collection expectations. The grant is not clear about what additional data states are expected to collect and report. The administration should provide explicit guidelines detailing the precise scope, frequency, and metrics required of both HSCOs and state entities to ensure consistency and avoid redundant reporting burdens. The 10.4-hour burden estimate is too low given multi-agency approvals and the new Governor's office engagement required; we request OHS recalibrate the burden estimate after clearly defining the data collection expectations.

Data and access to data systems are necessary for effective coordination and collaboration. Currently, HSCOs do not have access to sufficient data from OHS/ACF to represent their state's Head Start programs well. HSCOs need access to more data than the currently available addresses and funding. They need access to information about who is in the Designation Renewal System (DRS) or in the Full Enrollment Initiative (FEI), who is implementing changes in scope or conversion of slots, and who has a new Head Start Director. There is no communication or inclusion of HSCOs in some regions since the mass closure/consolidation of regional offices. In order for HSCOs to be effective and succeed, OHS needs to support them with the data and communication they need. In the past, when programs were selected for the loss of funds related to the enrollment initiative, the regional office alerted the HSCO as

loss of federal funds might impact the amount of state supplemental funding a program would receive. Now, HSCOs rely on individual programs to alert them of changes.

NHSA thanks you for the opportunity to provide public comments and remains committed to collaborating with the administration to support Head Start children, families, and communities across the nation.

Sincerely,

A handwritten signature in cursive script that reads "Yasmina Vinci". The ink is dark and the signature is fluid.

Yasmina S. Vinci
Executive Director