



August 10, 2026

Lizbeth Casco-White
Director, Office of Head Start
Via email: infocollection@acf.hhs.gov

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

Dear Director White:

Head Start California (HSC) is the nonprofit association that supports and represents California's 137 Head Start providers. In support of our member programs, HSC works closely with the California Head Start State Collaboration Office (CHSCO). We have continually worked together to streamline implementation of Head Start and improve integration with State systems. We appreciate the opportunity to comment on the proposed FY27 HSCO Grant Scope and Application Instructions.

We recognize that California's HSCO may be uniquely positioned among Collaboration offices, and our comments reflect the strength of our HSCO's existing position. A Governor-appointed employee employed within the Department of Social Services, our HSCO Director is an integral member of the state system and currently works in close concert with the Governor's office and various relevant state departments. Our state work is guided by a [Master Plan for Early Learning and Care](#) (the Master Plan), and our HSCO Director has been appointed by the Governor to sit on the State Advisory Council, known as the Early Childhood Policy Council (ECPC).

After reviewing the proposed grant application, we would like to offer the following comments and requests for clarification.

Objective 1

We request clarification on the intended meaning of the objective to "support" the State Advisory Council. While our HSCO Director does not provide administrative or financial support to the ECPC, we believe that the Director's role as a member of the ECPC meets and likely exceeds the expectation to "support" it.

Objective 2

While the CHSCO is currently well-positioned to be a leading partner in statewide ECE decisions, we note that this may not always be the case. The position of the HSCO within the state hierarchy – and its relationship with the governor's office - is dictated by complex state systems, including laws and practices regarding state employees, over which many HSCOs inherently have limited influence.

Further, the position of the HSCO and its ability to integrate with other state systems is highly intertwined with the administration of the CCDF program. We request confirmation that the CCDF program will equally be expected to elevate the role of the HSCO in that system.

Objective 3

We request clarity regarding the intended meaning of the terms “meaningfully integrate” and “embedding.” In reviewing the examples listed, we note that many examples extend to realms that the HSCO may be able to influence, but are ultimately subject to myriad forces and out of the HSCO’s control. For example, California’s ECE financing strategy is determined by voters, both houses of our legislature, and the Governor.

Priorities

We appreciate and support the goal of fostering coordinated, cross-system leadership to strengthen state ECE systems. We note, however, that advancing multiple sources of priorities as proposed in the revised application creates opportunities for evolving, unclear, conflicting, or overwhelming priorities. The HSCOs are legally required to advance the priorities detailed in section 642B of the Head Start Act. Traditionally, the grant scope has been closely tied to the Head Start Act. Relying on Administration, ACF, and State priorities de-couples the scope from the Act and significantly expands the potential duties of the HSCO. The revised grant scope also proposes that HSCOs follow Administration priorities, ACF priorities, governor priorities, and state priorities. It is unclear as to what exactly would constitute state priorities; in California there are many official statewide agencies, workgroups, and legislative bodies with early childhood education priorities.

Current levels of HSCO funding only allow for very small offices – California has a federally-funded full-time HSCO Director who is supported by a state-funded analyst who is occasionally re-directed to other state priorities. With at best 2 full-time employees, the CHSCO is limited in the scope of priorities it has capacity to support and could easily become overwhelmed by this many priorities.

We request clarity as to where HSCO priorities should lie in case of conflicts among the varying sets of priorities. For example:

- The Master Plan focuses on equitable access and equitable opportunities. However, ACF priorities indicate ACF-funded programs must be “DEI free.”
- The Master Plan focuses on meeting the needs of English language learners, those with disabilities, and children experiencing poverty, homelessness, or involved in the child welfare system. ACF priorities focus on marriage, fatherhood, two parent families, and supporting life.

We also request clarity as to the intended process for shifting priorities mid-grant year. Due to election and legislative cycles, governor and state priorities will inevitably change at various points throughout the grant term. The revised application is unclear as to what actions the HSCO should take in the event that changing priorities drive a change in activities without necessitating a budget revision.

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We appreciate your attention to our comments and look forward to working together to ensure Head Start remains well-integrated in state systems.

Regards,



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