



# Hidalgo County Head Start Program

## Policy Council Regular Agenda

**DATE:** May 18, 2022

**SUBJECT:** Discussion/Approval of Amendment to the Hidalgo County Head Start Program Priority Guidelines for Selection and Enrollment

**RAIONALE/NEED:** The Program must comply with Information Memorandum, ACF-IM-HS-22-03 dated 04/21/2022, from the Administration for Children and Families and include Supplemental Nutrition Assistance Program (SNAP) recipients as categorically eligible to participate in Head Start Programs. HCHSP's Priority Guidelines for Enrollment and Selection will reflect SNAP as categorically eligible Head Start participants on priority Ranking No. 6, along with TANIF and SSI beneficiaries.

**RECOMMENDATION:** Administration recommends approval.

**COST:** None

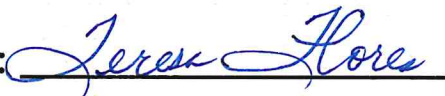
**RELATED INFORMATION INCLUDES:** ACF-IM-HS-22-03 & Priority Guidelines

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**INITIATED BY:** Elvira Segura, Family Services Director

**REVIEWED BY:** Edmundo Garcia, Assistant Director for Programmatic Services

**EXECUTIVE DIRECTOR'S APPROVAL:**

  
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<b>ACF</b> <b>Administration for Children</b> <b>and Families</b>	<b>U.S. DEPARTMENT OF HEALTH</b> <b>AND HUMAN SERVICES</b>	
	1. Log No. ACF-IM-HS-22-03	2. Issuance Date: 04/21/2022
	3. Originating Office: Office of Head Start	
	4. Key Words: Head Start; Eligibility; Supplemental Nutrition Assistance Program; SNAP; Categorical	

**INFORMATION MEMORANDUM**

**TO:** All Head Start and Early Head Start Agencies and Delegate Agencies

**SUBJECT:** Head Start Categorical Eligibility for Families Eligible for the Supplemental Nutrition Assistance Program

**INFORMATION:**

The Administration for Children and Families (ACF) strives to ensure that programs minimize the burden on families seeking public assistance and to coordinate benefit programs in such a way that families who are eligible for one benefit program can more easily participate in other services for which they are eligible. ACF issues this Information Memorandum (IM) to set forth its interpretation of the phrase “public assistance” in Sec. 645 of the Head Start Act to include the Supplemental Nutrition Assistance Program (SNAP). Adopting this interpretation will make it easier for eligible families to enroll children in Head Start services by allowing families to demonstrate proof of SNAP receipt or eligibility to enroll in Head Start and will simplify the process of determining program eligibility for grantees.

For the purposes of Head Start eligibility determination, the Office of Head Start (OHS) will expand its interpretation of “public assistance,” as used in the Head Start statute, to include SNAP. OHS’s interpretation of the statute has been to consider only Temporary Assistance for Needy Families (TANF) and Supplemental Security Income (SSI) as public assistance. Previously, we had not considered including SNAP in this definition because it had slightly higher income threshold than the base income threshold for Head Start services. However, recently there has been a sharp reduction in families that establish eligibility through the current public assistance definition, so we have reconsidered this interpretation to make the public assistance route more available to families and grantees.

Upon issuance, this IM adds SNAP to public assistance to determine recipients as categorically eligible for Head Start programs. Recently, we have found that SNAP households with young children have equivalent level of need to families currently receiving Head Start services<sup>1</sup>. Note that this approach does not guarantee a SNAP recipient enrollment in a Head Start program. Programs must adhere to their recruitment and selection criteria to ensure they prioritize enrollment for those who may benefit most from Head Start services. The sole purpose of this

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<sup>1</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2019. Alexandria, VA, 2021.

document is to make clear that Head Start programs can consider SNAP as public assistance for purposes of determining Head Start eligibility.

### **Enhanced Public Assistance Eligibility to Support Enrollment**

Congress established Head Start eligibility criteria in [Sec. 645\(a\)\(1\)\(B\)\(i\)](#) of the Head Start Act to include families with incomes at or below the federal poverty level and families that are eligible for public assistance. Congress also allowed for other categorical eligibility allowances which consider family need rather than income. For example, children experiencing homelessness and children in foster care are categorically eligible for Head Start services.

The interpretation provided herein, that SNAP is considered public assistance” for purposes of section 645(a)(1)(B)(i) of the Head Start Act, does not change statutory eligibility criteria. Given the flexibilities inherent in the statute and the duty of programs to ensure they are serving the most needy families in their communities ([45 CFR §1302.13](#)), the primary effect of this IM is to eliminate barriers to families who are already eligible for, and in many cases already enrolled in, Head Start services by providing a streamlined way for such families to demonstrate eligibility. Moreover, inclusion of SNAP as public assistance reduces the challenge of navigating multiple federal program eligibility processes and supports better alignment and coordination across federal programs, a factor that President Biden’s [Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government called for federal agencies to consider](#).

Since 2015, the share of families enrolling in Head Start services based on the statute’s public assistance receipt prong has declined from 16% of the total enrollment to just 10% in 2019. This drop represents more than 50,000 slots and comes at a time when there have been vacant Head Start slots. This has caused unnecessary burden for families and grantees during eligibility determinations and needlessly undercuts the use of public assistance categorical eligibility and has impacted the number of vacant slots. The need for public assistance and the share of Head Start participants receiving public assistance has remained stable over the same timeframe despite the decline in programs using public assistance categorical eligibility. Between 2015 and 2019, nearly half of Head Start enrollees were also receiving SNAP benefits. The addition of SNAP would greatly facilitate the enrollment of children on SNAP who have demonstrated the need for services. Furthermore, the interpretation put forth in this IM will reduce undue burden in the eligibility determination process for these children and their families.

This interpretation is reasonable under the statute, and it furthers the important policy goal of better reaching families who could already benefit from Head Start services but are not currently enrolled. The great majority of young children in SNAP households are in families with incomes below 100% of poverty; but currently, these families must document their income eligibility, which can be burdensome to both families and grantees. Documenting income eligibility requires a large number of pay stubs or other income documentation while SNAP eligibility can be determined by a single document. Allowing programs to count receipt of SNAP as establishing categorical eligibility will reduce these administrative burdens and improve access for these families.

Most (about 3 million) of these families, according to SNAP data, have incomes at or below 100% of the poverty line.<sup>2</sup> This IM provides a new way for such families to more easily prove their eligibility. Some SNAP recipients (about 600,000) have family incomes above the 100% poverty line but only about 150,000 of these families have incomes above 130% of the poverty line. Those families with incomes above 100% but below 130% of poverty could already be eligible for Head Start services through existing allowances for programs to enroll families above the 100% of the poverty line with demonstrated need for program services.

Importantly, all Head Start programs must continue to use their selection criteria to prioritize the enrollment of the families most in need of services as required in 45 CFR §1302.13. Therefore, the inclusion of SNAP is unlikely to substantially expand the number of Head Start participants with incomes exceeding 100% of poverty.

This interpretation also facilitates cross-program recruitment and eliminates duplicative and burdensome paperwork for families who are already eligible for a federal public assistance benefit. Removing the frustration of multiple eligibility processes will allow families to easily access the vital early childhood services that Head Start programs provide.

### **Implementation of Policy Guidance**

Upon issuance of this IM, public assistance includes SNAP for purposes of determining categorical eligibility. Head Start programs can use this guidance in determining eligibility and in enrolling those children that met their selection criteria consistent with the Head Start Program Performance Standards at [45 CFR §§1302.10-16](#). If a program has vacant slots, this guidance can support enrolling additional families.

To verify SNAP receipt or potential eligibility, a program would 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 card with SNAP ID number to become categorically eligible for Head Start services.

Programs should consider revisiting their [Eligibility, Recruitment, Selection, Enrollment, and Attendance \(ERSEA\)](#) policies and procedures in light of this guidance. Policies and procedures must always support a program's eligibility determinations to ensure they are meeting all requirements under 45 CFR §1302. Annual review of the community needs assessment at 45 CFR §1302.11(b) will allow programs to determine if, based on SNAP recipients in the community, they need to address their selection criteria as previously referenced. Programs may also examine community partnerships and outreach efforts for ways to encourage SNAP recipients to apply for Head Start services.

Please refer any questions to your ACF regional office.

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<sup>2</sup> Ibid

Thank you for your work on behalf of children and families.

/ Dr. Bernadine Futrell /

Dr. Bernadine Futrell  
Director  
Office of Head Start



## Hidalgo County Head Start Program Priority Guidelines for Enrollment 2022-2023

Priority Ranking	
1	Children who are 3 or 4 years of age of families who are HOMELESS. <b>Ref. 1305 Definitions</b>
2	Children who are 3 or 4 years of age who are in FOSTER care. <b>Ref. 1305.2 Definitions</b>
3	Children who are 3 or 4 years old of age who are DISABLED. Must be income eligible. 10% of enrollment opportunities are available to children with disabilities. Once the program has met the 10% enrollment quota, children with disabilities and non-disabled children will compete equally based on need as described in Priority Rankings. <b>Ref: 1302.14(b)(1)</b>
4	Children from Head Start Waitlist from previous year.
5	Children from Early Head Start. Must be income eligible.
6	Children who are 3 and 4 years of age of families that receive SNAP, TANF or SSI benefits. <b>Ref. 1305.2(1) and OHS-PC-1-016 ACF-IM-HS-22-03</b>
7	Children who are 3 or 4 years of age, whose parent(s) are active in the “Uniformed Services” of the United States. Uniformed services are Army, Navy, Air Force, Marines, or Coast Guard. Must be income eligible. <b>Ref. Sec. 645(3)(A) of the Head Start Act; 37 USC 101; 37 USC 310; USC 403; 10 USC 2871-2872 and 2882</b>
8	Children who are 3 or 4 years of age, whose parent(s) are disabled or elderly (60+ years). Must be income eligible.
9	Children who are 3 or 4 years of age of single parents who work full time, or are full time students or are in training for 30+ hours. Must be income eligible.
10	Children who are 3 or 4 years of age of a two parent household, who both work full time, or full time students or are in training for 30+ hours. Must be income eligible.
11	Children who are 3 or 4 years of age of single parents who are unemployed. Must be income eligible.
12	Children who are 3 or 4 years of age of two parents household where one parent is employed, in school, or in training and the other is unemployed. Must be income eligible.
13	Children who are 3 and 4 years of age of two parent household, where both parents are unemployed. Must be income eligible.
14	Children who are 3 or 4 years of age whose families’ income is between 100% thru 130% of the poverty guidelines. (Note: No children who fall within this ranking will be enrolled until all other rankings are exhausted.) Priority 14 must not exceed 35% of the funded enrollment. <b>Ref. 1302.12(d )(1)</b>
15	Children who are 3 or 4 years of age who are DISABLED and whose families’ income is above 130% of the Priority Guidelines. (Note: No children who fall within this ranking will be enrolled until all other rankings are exhausted.) Eligible children above 130% must not exceed 10% of the funded enrollment. <b>Ref. 1302.12(d )(2)</b>
16	Children who are 3 or 4 years of age whose families’ income is above 130% of the Priority Guidelines. (Note: No children who fall within this ranking will be enrolled until all other rankings are exhausted.) Eligible children above 130% must not exceed 10% of the funded enrollment. <b>Ref. 1302.12(d )(2)</b>

Policy Council Approval:  
Grantee Board Approval:



## Hidalgo County Head Start Program Priority Guidelines for Selection and Enrollment Program Year 2022 – 2023

The Hidalgo County Head Start Program does NOT deny anyone the right to apply regardless of race, sex, creed, color, national origin or disabling condition. The families of children applying for admittance to the Hidalgo County Head Start Program MUST meet income, age and other pertinent criteria. Final approval will be granted by the Hidalgo County Head Start Policy Council. Persons wishing to contest a denial for enrollment may do so by submitting their grievances or concerns in writing to the Hidalgo County Head Start Policy Council, at P.O. Box 0117, Edinburg, Texas 78540.

### DEFINITIONS

- Parent:** The term parent used in this document is defined as the biological parent or legal guardian.
- Legal Guardian:** The term “legal guardian” means a person who is appointed guardian or a temporary guardian by the court, and has been awarded legal custody of a minor children in accordance to Texas Civil Statute, Chapter XIII, Sec. 6.01, 6.81, 6.82, and 6.84.
- Family:** The term family is defined as all persons living in the same household who are supported by the income of the parent(s) or guardian(s) of the child enrolling in the program and/or related to the parent(s) or guardian(s) by blood, marriage or adoption. Ref 1305.2(e). Federal Recognition of Same-Sex Spouses/Marriages Ref: ACF-IM-HS-14-03. Note; Single, divorced, separated, and widowed parents must provide proof of marital status.
- Age:** A child must be at least (3) years old by **September 1, 2022** and is eligible UNTIL the child enters kindergarten to be eligible for services. Ref: 1302.12(i).
- Income:** To be eligible for Head Start services, a family must be income eligible within 100% of the poverty guidelines. Ref: <https://aspe.hhs.gov/poverty-guidelines> 12/01/2022. Families may be eligible if their income is between 100% thru 130% of the poverty guidelines. Ref: P.L. 110-134, ACF-IM-HS-08-01. Detailed Definition of Income – Ref: ACF-IM-HS-09-02. /ACF-IM-HS-22-03 4/21/2022
- Military Personnel** Only the base pay of active military personnel will be allocated to calculate the individual’s income. Head Start Reauthorization; P.L. 110-134, ACF-IM-HS-08-01.
- Full Day** Children who meet the applicable criteria and qualify for services will be provided with **FREE** services from 7:45 AM till 5:15 PM; Ref: 1305.
- Selection:** A systematic process is used to review all applications for Head Start services. The Priority Guidelines will identify those children most in need. Ref: 1302.14.
- Enrollment:** Children remain eligible the succeeding enrollment year, regardless of income, provided that they did not drop prior to the last day of school. Ref: 1302.15. The Program may choose not to enroll a child when there is a change in the child’s family income and there is a child with a greater need for Head Start Services. Ref: 1302.15.
- Waitlist:** A three (3) year old waiting list and a four (4) year old waiting list will be maintained at each Head Start Center. This will ensure that eligible children enter the program as vacancies occur and children are placed in age appropriate classrooms. Ref: 1302.14 (c).

### Information required to apply and qualify for the Hidalgo County Head Start Program are:

- Child’s Birth Certificate or Baptismal Certificate, and Social Security Number
- SNAP, TANF or SSI
- 2021 Income Tax Return & Appropriate W-2 Forms, Schedule C’s, Schedule K’s, etc.
- All Appropriate Child Support Information (Divorce Decree or State Attorney General’s Office – Child Support Award Letter) for Parents Who are Single, Separated, or Divorced
- Medical Insurance Information, such as Medicaid, CHIPS, or Private Insurance
- All Appropriate Medical Information Regarding Children with Special Needs

Policy Council Approval:

Grantee Board Approval:



**U.S. Federal Poverty Guidelines for Eligibility  
For Head Start Programs  
PY 2022 – 2023**

<b>Size of Family Unit</b>	<b>100% Poverty Income Guidelines</b>	<b>130% Poverty Income Guidelines</b>
<b>1</b>	<b>\$13,590</b>	<b>\$17,667</b>
<b>2</b>	<b>\$18,310</b>	<b>\$23,803</b>
<b>3</b>	<b>\$23,030</b>	<b>\$29,939</b>
<b>4</b>	<b>\$27,750</b>	<b>\$36,075</b>
<b>5</b>	<b>\$32,470</b>	<b>\$42,211</b>
<b>6</b>	<b>\$37,190</b>	<b>\$48,347</b>
<b>7</b>	<b>\$41,910</b>	<b>\$54,483</b>
<b>8</b>	<b>\$46,630</b>	<b>\$60,619</b>
Add \$4,720 for each additional family member		

100% Poverty Income Guideline Source: <https://aspe.hhs.gov/poverty-guidelines>

130% Poverty Income Guideline Source: Ref: P.L. 110-134, ACF-IM-HS-08-01.

Policy Council Approval:  
Grantee Board Approval: