

January 19, 2024

Lindsay Hutchinson  
Office of Head Start  
U.S. Department of Health and Human Services  
Washington, DC 20201

Dear Lindsay Hutchinson,

We are writing to express our views on specific elements of the notice of proposed rulemaking (NPRM) issued by the Office of Head Start pertaining to Supporting the Head Start Workforce and Consistent Quality Programming. As a robust, diverse and well-compensated Head Start workforce is critical to the success of the Federal child care system and paramount to the development of children from low-income families, we very much appreciate the opportunity to comment on this key regulatory proposal.

UnidosUS is a nonprofit, nonpartisan organization that serves as the nation's largest Hispanic civil rights and advocacy organization. Since 1968, we have challenged the social, economic, and political barriers that affect Latinos through our unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico. We believe in an America where economic, political, and social progress is a reality for all Latinos, and we collaborate across communities to achieve it.

First, we would like to express our strong support for improving the Head Start program through more robust compensation for Head Start staff and changing program requirements to expand access. Historically, there has been a severe disconnect between early childhood teachers' earnings and society's expectations of early childhood teachers. We applaud the Department for taking this step to recognize and rectify that discrepancy.

With this support in mind, we offer the following six comments on the NPRM as proposed:

### **Compensation**

Teachers in Early Head Start and Head Start Preschool programs (Head Start) are expected to meet a myriad of expectations, including implementing individualized learning experiences for diverse children across all developmental domains. Further, teachers are expected to engage children and cultivate their language and cognitive skills in a warm, nurturing environment. Head Start workforce have been expected to function as professionals, but their level of compensation has not matched the importance of their work.

UnidosUS believes that the best means of supporting and improving Head Start program quality is by making significant increases to the compensation, benefits, and supports for Head Start workforce, including teachers, home visitors, and family engagement staff. While we have concerns about potential slot losses as the Department discusses in the NPRM and urge Congress to allocate more funding, we believe that investing in the workforce is imperative. Moreover, the proposed rules present an opportunity to shift limited funding to focus on infants and toddlers, where enrollment can be expanded, staff retention addressed, and professional development and supports strengthened.

Especially as public pre-K participation rises and Head Start Preschool enrollment for 4- and 5-year-olds declines,<sup>1</sup> adequate and equitable funding must be directed to support services for the nation's youngest children, when brain development is most rapid. Notably, infant and toddler care require more resources, with the cost of infant care averaging 49 percent higher nationally than preschooler care, further emphasizing the urgency of prioritizing funding for this crucial stage of early childhood development.<sup>2</sup>

Current Early Head Start teacher salaries do not reflect the important demands of their profession. The proposed workforce investments rightly begin to close the gap between Early Head Start and Head Start Preschool teacher earnings, and between them and their public-school peers, and begin to recognize the immense value they bring to children's futures.

To minimize the challenges that regulatory implementation without additional funding would pose, we recommend that the Department provide a mechanism for the agency to modify the implementation timeline of new minimum salary requirements through a notice in the Federal Register in the event that Congress does not allocate sufficient funds to implement such requirements within the seven-year implementation window set forth in the regulatory language.

We also want to highlight the importance of retaining and expanding a bilingual Head Start workforce that can support the continued development of children's home languages while facilitating their acquisition of English. Research shows that bilingual Head Start educators are more likely to have positive beliefs about bilingual education<sup>3</sup> and that providing support for Head Start educators in classrooms with dual language students can foster such educators' comfort with those students.<sup>4</sup> Approximately one-third of all young children in the U.S, nearly 7.5 million children, are dual language learners. As proposed, the rule would require Head Start programs to consider the responsibilities, qualifications and experience of teachers when determining salaries. To retain and recruit new bilingual educators, we strongly encourage the Department to require programs to consider bilingualism as a factor when determining staff's qualifications and experience. We would also encourage the Department to direct programs to consider the languages spoken in the communities where the Head Start program is administered and consider the ability of teachers to communicate in those languages when establishing job descriptions and salary levels.

### **Migrant and Seasonal Head Start**

We applaud changes to the eligibility requirements for participation in Migrant and Seasonal Head Start (MSHS) eligibility. Expanding the eligibility requirements will offer more flexibility to families to pursue additional economic opportunities without fear of losing MSHS eligibility.

---

<sup>1</sup> The Annie E. Casey Foundation, Kids Count Data Center, <https://datacenter.aecf.org/data/tables/9786-head-start-enrollment-by-age-group#detailed/1/any/false/1095,2048,1729,37,871,870,573,869,36,868/1830,558,559,1831,122/19059> (accessed January, 2024).

<sup>2</sup> Center for American Progress, The True Cost of High-Quality Child Care Across the United States, June 28, 2021, <https://www.americanprogress.org/article/true-cost-high-quality-child-care-across-united-states/#:~:text=On%20average%2C%20across%20the%20United,when%20serving%20the%20youngest%20children> (accessed January, 2024).

<sup>3</sup> Garrity, S. M., Aquino-Sterling, C. R., & Salcedo-Potter, N. (2019). Head Start educators' beliefs about bilingualism, dual language development, and bilingual education. *Bilingual Research Journal*, 42(3), 308-323.

<sup>4</sup> Choi, J. Y., Ryu, D., Van Pay, C. K., Meacham, S., & Beecher, C. C. (2021). Listening to Head Start teachers: Teacher beliefs, practices, and needs for educating dual language learners. *Early childhood research quarterly*, 54, 110-124.

In addition to eligibility requirements, we would highlight that some of our affiliates who administer MSHS programs are reporting a discrepancy in the resources needed to adequately serve the migrant population and the seasonal worker population. Though program administrators are unsure of the exact reasons, they are finding that it is more expensive to serve the seasonal population and that there are more instances where this demographic needs mental health support. We ask the Department to connect with MSHS providers to determine how future regulations might support them in navigating this dynamic.

### **Mental Health**

UnidosUS applauds the Department's efforts to support the mental health of Head Start children, families and staff through the proposed regulations. We believe that expanded access to qualified licensed mental health professionals is one important element to effectively addressing the overall mental health of Head Start children. We encourage the Office of Head Start to ensure that its approach to mental health is inclusive of all stakeholders and is integrated into all aspects of Head Start program operations. While collaboration with licensed mental health is essential, we encourage the Department to direct Head Start programs to provide students with a variety of learning and experiential opportunities throughout their daily programming to promote positive mental health and wellness. Such option could include dedicated time for self-directed activities that foster creativity, social interactions and joy, opportunities for extended play, and daily experiences with books and print materials that reflect the student's cultures and home languages. We encourage the Department to conduct nationwide specific listening sessions on the resources and support that programs need to develop this approach.

### **Services to Enrolled Pregnant Women and People**

UnidosUS supports the changes that the regulation makes to broaden the scope of awareness of mental health information and education that may be helpful for expectant families as we believe that both prenatal and postpartum services are crucial to a child's development. Research shows that parental knowledge of child development is associated with child language and pre-literacy skills,<sup>5</sup> which further underscores the importance of families having access to such information. As part of the expanded requirements of what newborn visits to enrolled families must include, we encourage the Department to direct staff to provide families with information on child development, including accurate information on dual-language learning and the activities that promote cognitive and language development.

Unfortunately, Latino families often encounter misinformation and negative messages regarding the bilingual development of their children. The basic message is that children are "confused" when they grow up with two languages. According to a survey conducted by UnidosUS and BSP Research, 38% of Latino families reported that a speech therapist had recommended that they stop or reduce speaking

---

<sup>5</sup> Rowe, M. L., Denmark, N., Harden, B. J., & Stapleton, L. M. (2016). The role of parent education and parenting knowledge in children's language and literacy skills among White, Black, and Latino families. *Infant and Child Development*, 25(2), 198-220.

Spanish to their child. This data confirms our extensive, previously gathered anecdotal evidence that misinformation about early multilingual development is widespread.<sup>6</sup>

Scientific evidence contradicts the idea that home languages “confuse children” and “get in the way” of learning English and school success.<sup>7</sup> On the contrary, bilingual children can transfer knowledge from one language to the other. Thus, improving the skills of the home language can be beneficial for the society language, and it can improve school outcomes. For example, a study shows that Spanish-spoken abilities help children’s reading skills in English.<sup>8</sup> Furthermore, bilingualism can have long term benefits across many different domains; from cognitive to social and cross-cultural advantages.<sup>9</sup>

Providing this information about early language development and dual language learning during newborn visits, will provide parents with the tools and information they need to contribute positively to their child’s successful early development.

### **Professional Development and Staff Training**

We are pleased to see new regulations focusing on training and professional development opportunities for Head Start staff. As part of these updated regulations, we ask that the Department clarify that existing requirements for professional development on supporting dual language learners extend to home visitors and family engagement staff. As currently written, the regulations in Section 1302.92, Training and professional development, require research-based approaches to professional development for “education staff” on supporting dual language learners, among other things. To ensure that all staff working directly with children and families receive this critical professional development, UnidosUS suggests that the Department either clarify that such professional development requirements include home visitors and family engagement staff or define “education staff” in the regulations and include home visitors and family engagement staff in such definition.

Separate from this clarification, we encourage the Department to consider Federal actions, such as the issuance of guidance, to fully recognize children’s home language as a resource and highlight best practices for educators incorporation of children’s home languages into curricula.<sup>10</sup>

---

<sup>6</sup> UnidosUS, *Crucial Conversations: Discussing Early Dual Language Development with Speech/Language Therapists*, (Washington, DC: UnidosUS, November 2022), <https://unidosus.org/publications/crucial-conversations-discussing-early-dual-language-development/> (accessed January, 2024).

<sup>7</sup> National Academies of Sciences, Engineering, and Medicine (NASEM), *Promoting the Educational Success of Children and Youth Learning English: Promising Futures* (Washington, DC: National Academies Press, 2017), <https://nap.nationalacademies.org/catalog/24677/promoting-the-educational-success-of-children-and-youth-learning-english> (accessed January 2024).

<sup>8</sup> Miller, J. F., Heilmann, J., Nockerts, A., Iglesias, A., Fabiano, L., & Francis, D. J. (2006). Oral language and reading in bilingual children. *Learning Disabilities Research & Practice*, 21(1), 30-43. doi: 10.1111/j.1540-5826.2006.00234.x. (accessed January, 2024).

<sup>9</sup> Marian, V. (2023). *The Power of Language: How the Codes We Use to Think, Speak, and Live Transform Our Minds*. New York, NY: Dutton, p. 77.

<sup>10</sup> Early Edge, Children’s Equity Project, UnidosUS, *Immediate Actions the Biden Administration Can Take for DLLs*, <https://unidosus.org/publications/immediate-actions-the-biden-administration-can-take-for-dual-language-learners/> (accessed January, 2024).

**Transportation**

UnidosUS supports the proposed regulatory changes expressly identifying transportation as a barrier to regular attendance and the requirement for programs to provide or facilitate transportation if needed. Transportation is a barrier that Latino families consistently report facing and the new regulations offer a potential remedy for addressing this barrier.

**Adjustments for Excessive Housing Costs for Eligibility Determination**

UnidosUS supports the NPRM's adjustment for excessive housing costs when determining family eligibility for Head Start. As noted in the NPRM, low-income households across the nation contend with high costs of living. Given that Head Start programs focus on providing low-income families with quality early childhood education, it is essential that the Department consider families' housing costs in determining eligibility for such services. Therefore, we support the Department's common-sense approach to recognize housing costs as a financial stressor for low-income families and to allow for adequate consideration of these costs in eligibility determinations.

Thank you for considering our comments and for your attention to these important matters. UnidosUS stands ready to support the Department as it continues to improve the Head Start programs and stabilize the Head Start workforce.

Sincerely,

Tania Villarroel  
Senior Policy Analyst  
Early Childhood Education  
UnidosUS