



# Promoting Healthy Eating and Nutrition for Head Start Children and Families

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 [headstart.gov/policy/im/acf-ohs-im-25-03](https://headstart.gov/policy/im/acf-ohs-im-25-03)

## Promoting Healthy Eating and Nutrition for Head Start Children and Families ACF-OHS-IM-25-03

U.S. (United States) Department  
of Health and Human Services

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### Information Memorandum

**To:** All Head Start Recipients

**Subject:** Promoting Healthy Eating and Nutrition for Head Start Children and Families

#### Information:

Head Start programs play a vital role in supporting healthy eating and nutrition for enrolled children and families. Access to healthy foods and other nutrition services helps children grow, develop, and learn. Good nutrition is essential for brain development and provides children with the energy needed to stay active and focused throughout the program day. A balanced diet helps strengthen a child's immune system, reducing the risk of infections and illnesses. It also prevents childhood obesity, which can lead to chronic diseases like heart disease and diabetes.

This Information Memorandum (IM) affirms the critical role of Head Start programs in ensuring children and families have access to healthy food and comprehensive nutrition services. It also includes an overview of relevant statutory and regulatory requirements and

reminds programs of the resources and partnerships available to support robust nutrition services for children and families. Lastly, this IM provides tips to foster enthusiasm for healthy eating in early learning environments and encourages Head Start programs to use innovative strategies to promote health and nutrition. An appendix of additional resources is included to guide programs in their efforts.

## **BACKGROUND:**

Head Start programs play an important role in achieving healthy outcomes for children and families. Nutrition services can be particularly impactful for families who experience food insecurity or live in communities where affordable, healthy food is less available. Research indicates that Head Start children are more likely to receive dental checkups and have healthy eating patterns than non-participants. They also have lower Body Mass Index (BMI) scores and are less likely to be overweight compared to children in other non-parental care ([Lee et al., 2013](#)). Obese, overweight, or underweight children who participate in Head Start have a significantly healthier BMI by kindergarten ([Lumeng, et al., 2015](#)). Additionally, Head Start graduates have better health status as adults than non-graduates; they are 7 percent less likely to be in poor health as adults than their siblings who did not attend Head Start ([Johnson, 2010](#); [Deming, 2009](#)).

The Head Start Program Performance Standards (the Performance Standards) prioritize nutrition services that are culturally and developmentally appropriate and meet each child's individual needs, including those with disabilities, allergies, and special dietary needs ([45 CFR §1302.44\(a\)\(1\)](#)). In doing so, programs help children experience a variety of nutritious foods, provide mealtime opportunities for socialization and enrichment, and support families in learning about the importance of healthy foods at home.

Head Start programs promote access to healthy food and nutrition in many ways. This includes, but is not limited to:

- Increasing access to and availability of healthy foods for children and families in classrooms, during home visits or group socialization activities, and during parent and family engagement activities.
- Supporting families with pregnancy, post-partum, and breastfeeding, as well as ensuring the nutritional needs of infants and toddlers are fully met.
- Helping families access affordable, healthy food options at home.
- Providing families with education on nutrition and the importance of physical activity.
- Reducing administrative burden and supporting families to get connected with other nutrition-related services for which they might be eligible, such as the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Assistance Program for Women, Infants, and Children (WIC).

- Using registered dietitians or nutritionists to support the implementation of Head Start requirements for healthy nutrition.
- Making safe drinking water available to children during the program day.
- Providing materials and equipment for center-based or home-based learning activities related to healthy eating, such as supplies to create gardens, greenhouses, and Indigenous seed hubs.

All Head Start grant recipients and their delegate agencies are required to participate in the Child and Adult Care Food Program (CACFP). The CACFP is a federal United States Department of Agriculture (USDA) program that provides reimbursements for nutritious meals and snacks to eligible children enrolled in participating programs, including Head Start programs. Implementing the [CACFP meal patterns](#) helps to ensure children receive a variety of nutrient-dense foods, including whole grains, a variety of fresh fruits, and vegetables, all while reducing intake of ultra-processed foods, added sugar intake, and saturated fats. While CACFP mandates low-fat options, including low-fat and fat-free dairy products for children over the age of 2, emerging evidence ([Venn-Watson 2023](#); [Vanderhout, et al., 2020](#)) suggests whole, full-fat dairy supports child development. Head Start programs can explore offering whole dairy where funding allows. We will support implementation of possible updated guidelines while meeting current standards. CACFP also provides resources such as the [seasonal buying guide](#) to promote in-season local produce, which is often full of flavor and nutrients, less reliant on chemicals and pesticides, and supports sustainability and local farmers. Additional information on CACFP is provided in more detail below.

Head Start programs are also required to actively collaborate with parents and families, including expectant families, on healthy eating practices ([45 CFR §1302.46](#)). Programs also engage parents to discuss their child's nutritional status and provide opportunities for families to learn about preparing healthy food at home.

## Overview of Relevant Statutory and Regulatory Requirements

Nutrition services have been a hallmark of the Head Start program since its inception. This is reflected in the Head Start Act (the Act) and the Performance Standards, which detail program requirements related to food and nutrition. For instance, [Section 638](#) of the Act identifies nutrition as a key activity of the funding provided to Head Start agencies. [Section 648](#) of the Act requires programs to have qualified staff who can promote the importance of healthy, nutritional choices in daily classroom and family routines to prevent childhood obesity. The Act mentions nutrition services in other areas as well, as an essential part of comprehensive Head Start services.

The Performance Standards further outline what it means to provide nutrition services in Head Start programs. These requirements generally fall into two categories: those that occur when children are present in the teaching and learning environment, and those that focus on

engaging with families.

## Nutrition Requirements for the Teaching and Learning Environment

[Subpart D](#) of the Performance Standards focuses on the health and mental health requirements for Head Start programs. It states that programs must provide high-quality health, oral health, mental health, and nutrition services that are developmentally, culturally, and linguistically appropriate and that will support each child's growth and school readiness ([45 CFR §1302.40](#)). This includes serving foods that are familiar to children as well as new foods. There are various requirements within this subpart that elaborate on what is expected of Head Start programs in the area of nutrition services:

- All Head Start programs must design and implement nutrition services that meet dietary needs of each child, including children with special dietary needs and children with disabilities, to support their growth and school readiness ([45 CFR §1302.44\(a\)\(1\)](#)).
- To ensure up-to-date child health status, Head Start programs must identify each child's nutritional health needs, considering available health information such as special dietary requirements, food allergies, and community nutrition issues ([45 CFR §1302.42\(b\)\(4\)](#)).
- The Performance Standards at [45 CFR §1302.44](#) detail specific child nutrition requirements, which include:
  - Ensuring each child in a program that operates for fewer than six hours per day receives meals and snacks that provide **one third to one half** of the child's daily nutritional needs.
  - Ensuring each child in a program that operates for six hours or more per day receives meals and snacks that provide **one half to two thirds** of the child's daily nutritional needs.
  - Serving three- to five-year-olds meals and snacks that conform to USDA requirements and are high in nutrients and low in saturated fat, sugar, and salt. Expect possible future updates to nutrition guidelines to reflect the latest science, including providing whole, full-fat dairy for child development.
  - Making sure that all children receive a nourishing breakfast by providing nutrient rich foods for children who did not eat breakfast before they arrived at their Head Start center.
  - Providing appropriate healthy snacks and meals to each child during group socialization activities in the home-based option.
  - Promoting breastfeeding for mothers who wish to breastfeed during program hours. This may include offering facilities to properly store and handle breast milk and making accommodations when needed.
  - Connecting families to community lactation consultants or counselors when they choose breastfeeding but need support to be successful.

[Subpart C](#) of the Performance Standards focuses on the teaching and learning environment specifically when children are in center-based and family child care programs. The Performance Standards ensure that mealtimes are structured and used as learning opportunities. Language skills are strengthened through social conversations and fine motor abilities are tested in handling utensils or serving aides. The social skills involved in the back and forth of mealtime conversation also help children navigate friendships, turn-taking, and self-regulation.

Programs must implement snack and mealtimes in a manner that supports children's development and learning ([45 CFR §1302.31\(e\)\(2\)](#)):

- [Family style dining](#) – when children and teachers sit together for a meal or snack – is encouraged when developmentally appropriate to support consistency between home and school by replicating the experience of eating together as a family. Family style dining also offers a chance for staff to model healthy food choices and the importance of nutrition. Head Start programs are encouraged to use family style meals when developmentally appropriate. Family style meals benefit children by:
  - Encouraging healthy food choices as teachers and peers model positive attitudes toward nutrition.
  - Supporting children to learn in developmentally appropriate ways about concepts such as serving sizes, nutritional food groups, and the value of trying new foods.
  - Offering opportunity for children to practice using appropriately sized utensils to serve themselves and helping to set and clear the table. This improves children's fine motor skills, boosts their self-confidence, and expands their social skills.
- Support children's understanding of how food and nutrition contribute to growth and overall health, in alignment with the Head Start Early Learning Outcomes Framework (ELOF). For example, a preschooler should be supported to identify a variety of healthy and unhealthy foods, and to make healthy eating choices both independently and with support, and a toddler should show willingness to try nutritious foods when offered on multiple occasions.
- Make snack and mealtimes a positive experience for children. This means programs provide sufficient time for children to eat, avoid using food as a reward or punishment, and do not force children to finish their food. The Performance Standards help programs make meals enjoyable by creating [positive eating environments](#) where children are supported to develop and maintain healthy relationships with food.
- Promote consistency in mealtime routines between home and school by providing one-on-one time for infants during bottle feeding. For bottle-fed infants, Head Start programs must hold infants during feeding to support socialization. This one-on-one time helps staff build their relationships with infants. In turn, these safe and trusting relationships provide the foundation for learning and development because they help very young children feel secure and confident about exploring the world around them.

## **Nutrition Requirements for Engaging with Families**

Parent and family engagement is a cornerstone of comprehensive Head Start services. Programs must partner with families to support their wellbeing and their children's learning and development. As it relates to health and nutrition, programs are required to promote children's and families' health by providing nutrition education support services that are understandable to individuals, including individuals with low health literacy ([45 CFR §1302.46\(a\)](#)). Programs must collaborate with parents to discuss their child's nutritional status, including the importance of healthy eating, the negative health consequences of sugar-sweetened beverages, and the importance of physical activity. They must also help parents understand how to select and prepare nutritious foods that meet the family's nutrition and food budget needs ([45 CFR §1302.46\(a\)\(1\)\(ii\)](#)). Programs are strongly encouraged to provide specific information to families about the importance of eating whole foods and minimizing ultra-processed foods and avoiding added sugars such as those in soda and other sugar-sweetened beverages.

## **Funding and Partnerships to Support Nutrition Services for Head Start Programs, Children, and Families**

### **Child and Adult Care Food Program (CACFP) and Head Start Programs**

Head Start grant recipients and their delegate agencies are required to participate in CACFP ([45 CFR §1302.44\(b\)](#)), a federal program administered by the USDA, Food and Nutrition Services (FNS). Programs are reimbursed by CACFP for all enrolled children at the free rate. CACFP reimburses Head Start programs for up to two meals and one snack, or two snacks and one meal per day. All meals and snacks eligible for reimbursement by CACFP must conform to the requirements in the [CACFP Meal Patterns for Children](#).

The amount and type of food that must be offered varies based on the meal or snack, as well as the specific age group being served. USDA provides numerous resources to assist program officials in determining how foods credit toward the meal pattern requirements, including the [Food Buying Guide for Child Nutrition Programs](#) (FBG). Head Start programs are encouraged to speak with the [state agency](#) that administers the CACFP to determine if a food that is not in the FBG is eligible for reimbursement. [Additional videos](#) are available on the Head Start website to support programs with CACFP implementation.

Per [45 CFR §1302.44\(b\)](#), Head Start grant funds may be used to cover any allowable costs for meal services that are not covered by the USDA program. Foods purchased with Head Start grant funds must conform with the nutritional requirements in [45 CFR §1302.44\(a\)\(2\)\(iii\)](#), including being high in nutrients and low in saturated fat, sugar, and salt. Head Start funds may also be used to pay for food that is provided to families for consumption at home, if they have a specific programmatic purpose related to family engagement. For example,

Head Start programs can provide supplies for parents to engage in healthy cooking activities or start a family garden with their children at home, and parents can share about these experiences during parent groups or socializations.

### **Other Federal Programs that Support Healthy Eating and Nutrition for Head Start Children and Families**

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

WIC is a public health nutrition program administered by the USDA that provides nutrition education, nutritious foods, breastfeeding support, and health care referrals for income-eligible pregnant or postpartum women, infants, and children up to age 5. Head Start programs can support families to determine if they are eligible for WIC and then help them to enroll. Local WIC and Head Start programs work closely together in many communities to support the healthy development of children and families. This strong collaboration at the local level allows the two programs to coordinate their services and maximize use of resources (e.g., funding, staff, space) for children and families. Head Start programs are encouraged to view [suggested strategies and resources](#) to further enhance partnerships with WIC programs at the state and local levels.

Supplemental Nutrition Assistance Program (SNAP)

SNAP is a federal program administered by the USDA that provides food benefits to low-income families to supplement their grocery budget so they can afford the nutritious food essential to health and well-being. Similar to WIC, Head Start programs can support families to determine if they are eligible for SNAP and then help them to enroll. Families who already receive [SNAP are considered categorically eligible for Head Start services](#). This allows for [cross-program recruitment](#) and eliminates duplicative and burdensome paperwork for families who are already eligible for a federal public assistance benefit. It also reinforces access to healthy nutrition services for the children and families Head Start programs serve and provides opportunities to prioritize education about healthy food consumption, including the importance of minimizing ultra-processed and high-sugar foods.

### **Tips to Foster Enthusiasm for Healthy Eating and Nutrition**

Head Start programs have many options for integrating creative approaches to healthy eating and nutrition services that are aligned with the Performance Standards and developmental progressions in the [Head Start Early Learning Outcomes Framework \(ELOF\)](#). The tips below provide some examples:



- **Make nutrition education activities fun, interactive, hands on, and part of the daily schedule.** Connecting nutrition activities with reading, math, or science content makes for a comprehensive approach to learning. Send versions of learning materials home with parents with instructions for how they can share in this learning with their children. Some ideas include:
  - **Sensory activities and games:** Ask children to describe the tastes or texture of foods. Use fruits and vegetables with different colors, shapes, and textures, such as kiwi, pineapples, or avocados, and let children examine both the inside and outside of fruits and vegetables.
  - **Storytelling and pretend play:** Turn mealtime into story time. Turning broccoli into a “tree” or carrots into “sticks” makes mealtime fun. Outside of mealtime, use nutrition in imaginative play:
    - Pretend to be different characters making good food choices.
    - Read books with characters making healthy choices.
    - Set up a dramatic play area with healthy food choices in a kitchen, grocery store, or restaurant and talk about selecting nutritious foods.
  - **Meal planning:** Plan fun learning experiences like “Ingredient of the Week” where children select a healthy ingredient to be included in the daily lunch menu for a week. Host special days focused on nutrition, like “Fruit and Veggie Day,” or have a “Healthy Snack Party”. Reach out to the CACFP state agency contact for approved meal and snack ideas that increase variety. For families, provide take-home materials that encourage variety in meals. Consider easy, fast, and healthy recipes that can be part of a family’s routine menu at home.
  - **Growing plants:** Have a small garden or indoor plants to show children how food grows. Take a nature walk to find different food and plants or visit local farms and farmers markets. If in-person visits are not possible, use technology for a virtual farm trip.
  - **Mealtime:** Share materials with families that support making mealtime fun and educational. Help families engage children as part of meal prep. As their skills develop, children can participate in setting the table, washing fruit and vegetables, and mixing ingredients. Families can extend these learning moments by inviting children to count or measure ingredients, identify food colors, and learn new vocabulary.
  - **Family style meals:** Family style dining encourages learning and development not only at the table but away from mealtime as well. Children learn independence, social skills, and other important habits that will last them through adulthood. Parents who have not experienced family style meals often enjoy these experiences and, with support from program staff, may adopt these practices at home. Use these [tips for family style dining](#).



- **Increase access to fresh foods.** Explore opportunities to help children and families learn about and access fresh foods through creative experiential opportunities and connections:
  - **Connect with local businesses:** Take field trips to farmers markets, local working farms, or grocery stores to teach children about fresh fruits and vegetables. Children may be eager to identify new foods they would like to try. Teachers can use the foods in lesson plans and for [healthy snacks](#).
  - **Connect with other Head Start programs.** Visit other Head Start programs who are integrating experiential learning opportunities to promote health and wellness.
  - **Engage with families.** Ask parent volunteers to assist in the [creation of an on-site garden](#), where they can pick fresh food to take home for their families. Share information during parent groups and socializations about balancing nutrients, including calories, proteins, vitamins, and minerals. Staff can share books for parents to read with their children about what foods make up each food group and how much of each food group is needed to fuel the brain and body.
  - **Food pantries:** Establish relationships with local food pantries, if available in the community. Ensure you have a process for regularly checking in with all families about their food security and connect them to local food pantry resources as needed.
- **Focus on the communities served.** Take the time to get to know enrolled families on an individual and community level, and incorporate their traditions and culture into healthy meals at the program and as part of community events. Group events are a great time to serve traditional foods and explore community cultures. For example, offer a rotating, in-person or virtual cooking class drawing on healthy, local or cultural meals for the families in your program. Ingredients can be provided in advance.
- **Breastfeeding and infant nutrition.** Breastfeeding is the perfect mix of nutrition for growing babies. [The American Academy of Pediatrics \(AAP\)](#) recommends that infants be exclusively breastfed for the first six months, then breastfed for at least one year while they are introduced to complementary foods. Head Start programs can provide a [breastfeeding friendly environment](#) by having a nursing room on-site for either enrolled pregnant women or mothers who want to come to the program and breastfeed their enrolled infants.

Thank you for the work you do on behalf of children and families.

Sincerely,

/ Captain Tala Hooban /

Captain Tala Hooban  
Acting Director  
Office of Head Start

## Resources:

- [Fact Sheet: Promoting Healthy Eating and Nutrition for Head Start Children and Families](#)
- [Subscribe to the Early Childhood Health and Wellness](#) listserv to receive the monthly Small Bites newsletter, which features information and tools to help establish healthy nutrition practices.
- [Nutrition Building Blocks](#) is a free course offered through the Head Start learning management system, the Individualized Professional Development (iPD) Portfolio. Complete the course to earn continuing education unites while learning how to integrate healthy nutrition messages into music and movement activities for young children and teachers.
- [Caring for Children with Food Allergies](#) is a resource to help programs prepare to care for children with allergies to specific foods.
- [Watch the CACFP Meal Patterns Webinar](#) to learn about specific CACFP meal pattern requirements.
- [Healthy Feeding from the Start for Expectant Families](#) is a resource to help families understand how they can form healthy feeding habits from the beginning of their child's life.
- These resources offer family-friendly tips for establishing healthy and age-appropriate eating practices at home:
  - [Feeding Your 9-Month-Old](#)
  - [Feeding Your Toddler](#)
  - [Feeding Your Preschooler](#)
- [Supporting Food Security and Access to Indigenous Foods for Children and Families in Tribal Early Childhood Programs \(ACF-OHS-IM-25-01\)](#) provides information to Tribal Nations and communities regarding opportunities to use Head Start funding to promote access to healthy Indigenous foods.
- [Growing Head Start Success with Farm to Early Care and Education](#) is a resource to support programs with aligning the Performance Standards and the ELOF with farm to early care and education opportunities.

- [The Office of Disease Prevention and Health Promotion](#) leads prevention, nutrition, and physical activity programs, and has additional resources:
  - **Eat Healthy: Birth to Age 2**
    - English: [Build a Healthy Eating Routine for Your Baby \(Birth to Age 2\)](#)
    - Spanish: [Establece una rutina alimentación saludable para tu bebé \(desde el nacimiento hasta los 2 años\)](#)
  - **Eat Healthy: Kids & Teens**
    - English: [Help Your Child Build a Healthy Eating Routine](#)
    - Spanish: [Ayuda a tu hijo o hija a desarrollar una rutina de alimentación saludable](#)
  - **Cut Down on Added Sugars**
    - English: [Cut Down on Added Sugars](#)
    - Spanish: [Reduce el consumo de azúcares añadidos](#)
  - **Cut Down on Saturated Fats**
    - English: [Cut Down on Saturated Fat](#)
    - Spanish: [Reduce el consumo de grasa saturada](#)

Historical Document



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Office of Head Start | Region 5 | 233 North Michigan Avenue, Suite 400, Chicago IL 60601 | [eclkc.ohs.acf.hhs.gov](http://eclkc.ohs.acf.hhs.gov)

March 31, 2025

Mr. Cory Stine, Board Chair  
Great Lakes Community Action Partnership  
127 S Front St  
Fremont, OH 43420-3021

Re: Grant No. 05CH012792

Dear Mr. Stine,

This letter serves as formal recognition from the Office of Head Start (OHS) of Great Lakes Community Action Partnership's satisfactory completion of the underenrollment plan. Great Lakes Community Action Partnership has achieved and maintained at least 97 percent enrollment in Head Start and Early Head Start for six consecutive months following the conclusion of the 12-month period, which concluded on April 7, 2024.

Section 641A(h)(3) of the Head Start Act requires OHS to determine which Head Start agencies are operating with an actual enrollment that is less than full funded enrollment for not less than four consecutive months, and to develop, in collaboration with such agencies, a 12-month plan and timetable for reducing or eliminating underenrollment.

Great Lakes Community Action Partnership met the criteria listed in Section 641A(h)(4) of the Head Start Act and successfully implemented a plan to reduce underenrollment over the 12-month period. We know that achieving and maintaining full enrollment took significant work and effort, and we congratulate you on this important accomplishment.

Thank you for all that you do on behalf of children and families.

Sincerely,

/Karen McNamara/  
Karen McNamara

Regional Program Director  
Office of Head Start  
Administration for Children and Families

ATTACHMENT A

## Sec. 641A Standards; Monitoring of Head Start Agencies and Programs

...

(h) Reduction of Grants and Redistribution of Funds in Cases of Underenrollment-

(1) DEFINITIONS- In this subsection:

(A) ACTUAL ENROLLMENT- The term 'actual enrollment' means, with respect to the program of a Head Start agency, the actual number of children enrolled in such program and reported by the agency (as required in paragraph (2)) in a given month.

(B) BASE GRANT- The term 'base grant' has the meaning given the term in section 640(a)(7).

(C) FUNDED ENROLLMENT- The term 'funded enrollment' means, with respect to the program of a Head Start agency in a fiscal year, the number of children that the agency is funded to serve through a grant for the program during such fiscal year, as indicated in the grant agreement.

(2) ENROLLMENT REPORTING REQUIREMENT- Each entity carrying out a Head Start program shall report on a monthly basis to the Secretary and the relevant Head Start agency

(A) the actual enrollment in such program; and

(B) if such actual enrollment is less than the funded enrollment, any apparent reason for such enrollment shortfall.

(3) SECRETARIAL REVIEW AND PLAN- The Secretary shall

(A) on a semiannual basis, determine which Head Start agencies are operating with an actual enrollment that is less than the funded enrollment based on not less than 4 consecutive months of data;

(B) for each such Head Start agency operating a program with an actual enrollment that is less than its funded enrollment, as determined under subparagraph (A), develop, in collaboration with such agency, a plan and timetable for reducing or eliminating underenrollment taking into consideration--

(i) the quality and extent of the outreach, recruitment, and communitywide strategic planning and needs assessment conducted by such agency;

(ii) changing demographics, mobility of populations, and the identification of new underserved low-income populations;

(iii) facilities-related issues that may impact enrollment;

(iv) the ability to provide full-working-day programs, where needed, through funds made available under this subchapter or through collaboration with entities carrying out other early childhood education and development programs, or programs with other funding sources (where available);

(v) the availability and use by families of other early childhood education and development options in the community served; and

(vi) agency management procedures that may impact enrollment; and

(C) provide timely and ongoing technical assistance to each agency described in subparagraph (B) for the

purpose of assisting the Head Start agency to implement the plan described in such subparagraph.

(4) IMPLEMENTATION- Upon receipt of the technical assistance described in paragraph (3)(C), a Head Start agency shall immediately implement the plan described in paragraph (3)(B). The Secretary shall, where determined appropriate, continue to provide technical assistance to such agency.

(5) SECRETARIAL REVIEW AND ADJUSTMENT FOR CHRONIC UNDERENROLLMENT-

(A) IN GENERAL- If, after receiving technical assistance and developing and implementing the plan as described in paragraphs (3) and (4) for 12 months, a Head Start agency is operating a program with an actual enrollment that is less than 97 percent of its funded enrollment, the Secretary may--

- (i) designate such agency as chronically underenrolled; and
- (ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled under paragraph (3)(A).

(B) WAIVER OR LIMITATION OF REDUCTIONS- The Secretary may, as appropriate, waive or reduce the percentage recapturing, withholding, or reduction otherwise required by subparagraph (A), if, after the implementation of the plan described in paragraph (3)(B), the Secretary finds that--

- (i) the causes of the enrollment shortfall, or a portion of the shortfall, are related to the agency's serving significant numbers of highly mobile children, or are other significant causes as determined by the Secretary;
- (ii) the shortfall can reasonably be expected to be temporary; or
- (iii) the number of slots allotted to the agency is small enough that underenrollment does not create a significant shortfall.

(6) REDISTRIBUTION OF FUNDS-

(A) IN GENERAL- Funds held by the Secretary as a result of recapturing, withholding, or reducing a base grant in a fiscal year shall be redistributed by the end of the following fiscal year as follows:

- (i) INDIAN HEAD START PROGRAMS- If such funds are derived from an Indian Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Head Start programs.
- (ii) MIGRANT AND SEASONAL HEAD START PROGRAMS- If such funds are derived from a migrant or seasonal Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more programs of the type from which such funds are derived.
- (iii) EARLY HEAD START PROGRAMS- If such funds are derived from an Early Head Start program in a State, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Early Head Start programs in that State. If such funds are derived from an Indian Early Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Early Head Start programs.
- (iv) OTHER HEAD START PROGRAMS- If such funds are derived from a Head Start program in a State

(excluding programs described in clauses (i) through (iii)), then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Head Start programs (excluding programs described in clauses (i) through (iii)) that are carried out in such State.

(B) ADJUSTMENT TO FUNDED ENROLLMENT- The Secretary shall adjust as necessary the requirements relating to funded enrollment indicated in the grant agreement of a Head Start agency receiving redistributed funds under this paragraph.





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March 31, 2025

Mr. Cory Stine, Board Chair  
Great Lakes Community Action Partnership  
127 S Front St  
Fremont, OH 43420-3021

Re: Grant No. 05HP000472

Dear Mr. Stine,

This letter serves as formal recognition from the Office of Head Start (OHS) of Great Lakes Community Action Partnership's satisfactory completion of the underenrollment plan. Great Lakes Community Action Partnership has achieved and maintained at least 97 percent enrollment in Early Head Start for six consecutive months following the conclusion of the 12-month period, which concluded on April 7, 2024.

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Great Lakes Community Action Partnership met the criteria listed in Section 641A(h)(4) of the Head Start Act and successfully implemented a plan to reduce underenrollment over the 12-month period. We know that achieving and maintaining full enrollment took significant work and effort, and we congratulate you on this important accomplishment.

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Sincerely,

/Karen McNamara/  
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Regional Program Director  
Office of Head Start  
Administration for Children and Families

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(2) ENROLLMENT REPORTING REQUIREMENT- Each entity carrying out a Head Start program shall report on a monthly basis to the Secretary and the relevant Head Start agency

(A) the actual enrollment in such program; and

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(3) SECRETARIAL REVIEW AND PLAN- The Secretary shall

(A) on a semiannual basis, determine which Head Start agencies are operating with an actual enrollment that is less than the funded enrollment based on not less than 4 consecutive months of data;

(B) for each such Head Start agency operating a program with an actual enrollment that is less than its funded enrollment, as determined under subparagraph (A), develop, in collaboration with such agency, a plan and timetable for reducing or eliminating underenrollment taking into consideration--

(i) the quality and extent of the outreach, recruitment, and communitywide strategic planning and needs assessment conducted by such agency;

(ii) changing demographics, mobility of populations, and the identification of new underserved low-income populations;

(iii) facilities-related issues that may impact enrollment;

(iv) the ability to provide full-working-day programs, where needed, through funds made available under this subchapter or through collaboration with entities carrying out other early childhood education and development programs, or programs with other funding sources (where available);

(v) the availability and use by families of other early childhood education and development options in the community served; and

(vi) agency management procedures that may impact enrollment; and

(C) provide timely and ongoing technical assistance to each agency described in subparagraph (B) for the

purpose of assisting the Head Start agency to implement the plan described in such subparagraph.

(4) IMPLEMENTATION- Upon receipt of the technical assistance described in paragraph (3)(C), a Head Start agency shall immediately implement the plan described in paragraph (3)(B). The Secretary shall, where determined appropriate, continue to provide technical assistance to such agency.

(5) SECRETARIAL REVIEW AND ADJUSTMENT FOR CHRONIC UNDERENROLLMENT-

(A) IN GENERAL- If, after receiving technical assistance and developing and implementing the plan as described in paragraphs (3) and (4) for 12 months, a Head Start agency is operating a program with an actual enrollment that is less than 97 percent of its funded enrollment, the Secretary may--

- (i) designate such agency as chronically underenrolled; and
- (ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled under paragraph (3)(A).

(B) WAIVER OR LIMITATION OF REDUCTIONS- The Secretary may, as appropriate, waive or reduce the percentage recapturing, withholding, or reduction otherwise required by subparagraph (A), if, after the implementation of the plan described in paragraph (3)(B), the Secretary finds that--

- (i) the causes of the enrollment shortfall, or a portion of the shortfall, are related to the agency's serving significant numbers of highly mobile children, or are other significant causes as determined by the Secretary;
- (ii) the shortfall can reasonably be expected to be temporary; or
- (iii) the number of slots allotted to the agency is small enough that underenrollment does not create a significant shortfall.

(6) REDISTRIBUTION OF FUNDS-

(A) IN GENERAL- Funds held by the Secretary as a result of recapturing, withholding, or reducing a base grant in a fiscal year shall be redistributed by the end of the following fiscal year as follows:

- (i) INDIAN HEAD START PROGRAMS- If such funds are derived from an Indian Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Head Start programs.
- (ii) MIGRANT AND SEASONAL HEAD START PROGRAMS- If such funds are derived from a migrant or seasonal Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more programs of the type from which such funds are derived.
- (iii) EARLY HEAD START PROGRAMS- If such funds are derived from an Early Head Start program in a State, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Early Head Start programs in that State. If such funds are derived from an Indian Early Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Early Head Start programs.
- (iv) OTHER HEAD START PROGRAMS- If such funds are derived from a Head Start program in a State

(excluding programs described in clauses (i) through (iii)), then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Head Start programs (excluding programs described in clauses (i) through (iii)) that are carried out in such State.

(B) ADJUSTMENT TO FUNDED ENROLLMENT- The Secretary shall adjust as necessary the requirements relating to funded enrollment indicated in the grant agreement of a Head Start agency receiving redistributed funds under this paragraph.



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Head Start | Region 5 | 233 North Michigan Avenue, Suite 400, Chicago IL 60601 | [eclkc.ohs.acf.hhs.gov](http://eclkc.ohs.acf.hhs.gov)

February 26, 2025

Mr. Cory Stine, Board Chairperson  
Great Lakes Community Action Partnership  
127 S Front St  
Fremont, OH 43420-3021

Re: Grant No. 05HP000650

Dear Mr. Stine,

The Head Start Act sets forth specific requirements with regard to enrollment levels in Head Start programs. The Office of Head Start (OHS) is committed to supporting grant recipients' efforts to achieve full enrollment while maintaining the highest quality of services for children and families. To further our collective mission, OHS works together in partnership with grant recipients to increase enrollment in programs that have fewer children enrolled than their funded enrollment level.

We are writing to inform you that, pursuant to Section 641A(h)(3) of the Head Start Act, Great Lakes Community Action Partnership is required to develop a plan in collaboration with OHS to address its current underenrollment status. OHS recognizes that many Head Start programs are experiencing unprecedented challenges in hiring and retaining qualified staff. Please know that OHS staff will be working in partnership with you through this process to offer support, technical assistance, and guidance to better understand the enrollment challenges you are experiencing and develop solutions.

OHS also wants to ensure that grant recipients are fully aware of the requirements, expectations, and next steps in this process, which are further outlined in the sections below.

### **Full Enrollment Requirements**

Section 641A(h)(3) of the Head Start Act requires OHS to determine which Head Start agencies have operated with an actual enrollment that is less than full funded enrollment for at least four consecutive months. OHS is also required to collaborate with such agencies on the development of a plan and timetable for reducing or eliminating underenrollment.

Based on the Early Head Start enrollment level reported by your agency, Great Lakes Community Action Partnership, will be required to initiate a plan to improve enrollment in collaboration with OHS. The plan will last 12 months, with the goal of achieving at least 97 percent enrollment, as described in Section 641A(h)(5) of the Head Start Act. The 12-month period goes into effect 10 days following the date of this letter. During the 12-month period, OHS will partner with your agency to ensure that you have a plan and the technical assistant support necessary to reach full enrollment. The 12-month period will conclude not later than March 8, 2026.

OHS requests a meeting with your agency leadership within the next 30 days to collaborate on development of a plan for reaching at least 97% funded enrollment. OHS requests the Board Chair and/or a Governing Body Official be present during the meeting.

In preparation for the meeting, your organization should review available data and information including the community assessment as well as the factors in Section 641A(h) of the Head Start Act (included as Attachment A). This review should guide your agency in identifying the factors which may be contributing to your program's underenrollment.

Your assigned Program Specialist, Julia Goldberg, will contact you to schedule the meeting.

### **Underenrollment Reporting Requirements**

During the 12-month period, the following is required:

- **Center Level Enrollment Reporting** –Monthly enrollment **must be** reported by center and program option using the Center Level Reporting Spreadsheet. A webinar training on this requirement is available in the Head Start Enterprise System. Please watch, "Training –Center Level Reporting Spreadsheet", under the Enrollment tab of the Resources page to learn how to download, complete, and upload this spreadsheet when reporting monthly enrollment.
- **Enrollment Plan Submission** –Your organization must develop, in collaboration with the Regional Office, a plan and timetable for reducing or eliminating underenrollment. A working plan to reduce underenrollment **must be** submitted to the Regional Office within 30 days of the meeting. Please note, the Regional Office does not formally approve plans; however, the plan will be used to support and facilitate conversations during the 12-month period.

### **Next Steps and Potential Actions**

The Head Start Act also outlines potential actions if a Head Start program is under 97 percent enrollment after the 12-month period. OHS wants to ensure that you are fully aware of the potential actions following the 12-month period. If your agency reaches at least 97 percent enrollment at the end of the 12-month period, then OHS will continue to evaluate enrollment to ensure your program maintains at least 97 percent enrollment for the next six consecutive months. If this is achieved, a Completion Letter at the end of the six consecutive months will be issued as formal recognition of satisfactory completion of the underenrollment plan.

**If your agency has not reached at least 97 percent enrollment** at the end of the 12-month period, the Office of Head Start has the option of reducing grant funds. OHS will consider improvements in enrollment and action steps that the grant recipient has taken to address enrollment issues. We strongly recommend that you consider a Change in Scope application to restructure your budget to address the underlying causes of under-enrollment, including reducing slots to increase wages in order to recruit and retain teachers.

Based on your most recently reported enrollment levels, your Early Head Start program is underenrolled by 82 slots. If OHS were to decrease your funded enrollment according to this figure, it would equate to recapturing \$2,644,427 from your Early Head Start base grant. Please note, OHS is **not** recapturing any funds from your agency at this time and the figures presented in this letter are provided to you for informational purposes only based on current data.

We look forward to working with you as you evaluate your community, plan strategically, and implement your plan to reach full enrollment. For more information about the Full Enrollment Initiative, please see [ACF-PI-HS-18-04](#).

Sincerely,

/Karen McNamara/

Regional Program Director  
Office of Head Start, Region 5

## ATTACHMENT A

### Sec. 641A Standards; Monitoring of Head Start Agencies and Programs

...

(h) Reduction of Grants and Redistribution of Funds in Cases of Underenrollment-

(1) DEFINITIONS- In this subsection:

(A) ACTUAL ENROLLMENT- The term 'actual enrollment' means, with respect to the program of a Head Start agency, the actual number of children enrolled in such program and reported by the agency (as required in paragraph (2)) in a given month.

(B) BASE GRANT- The term 'base grant' has the meaning given the term in section 640(a)(7).

(C) FUNDED ENROLLMENT- The term 'funded enrollment' means, with respect to the program of a Head Start agency in a fiscal year, the number of children that the agency is funded to serve through a grant for the program during such fiscal year, as indicated in the grant agreement.

(2) ENROLLMENT REPORTING REQUIREMENT- Each entity carrying out a Head Start program shall report on a monthly basis to the Secretary and the relevant Head Start agency

(A) the actual enrollment in such program; and

(B) if such actual enrollment is less than the funded enrollment, any apparent reason for such enrollment shortfall.

(3) SECRETARIAL REVIEW AND PLAN- The Secretary shall

(A) on a semiannual basis, determine which Head Start agencies are operating with an actual enrollment that is less than the funded enrollment based on not less than 4 consecutive months of data;

(B) for each such Head Start agency operating a program with an actual enrollment that is less than its funded enrollment, as determined under subparagraph (A), develop, in collaboration with such agency, a plan and timetable for reducing or eliminating underenrollment taking into consideration--

(i) the quality and extent of the outreach, recruitment, and communitywide strategic planning and needs assessment conducted by such agency;

(ii) changing demographics, mobility of populations, and the identification of new underserved low-income populations;



(iii) facilities-related issues that may impact enrollment;

(iv) the ability to provide full-working-day programs, where needed, through funds made available under this subchapter or through collaboration with entities carrying out other early childhood education and development programs, or programs with other funding sources (where available);

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(C) provide timely and ongoing technical assistance to each agency described in subparagraph (B) for the purpose of assisting the Head Start agency to implement the plan described in such subparagraph.

(4) IMPLEMENTATION- Upon receipt of the technical assistance described in paragraph (3)(C), a Head Start agency shall immediately implement the plan described in paragraph (3)(B). The Secretary shall, where determined appropriate, continue to provide technical assistance to such agency.

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(i) designate such agency as chronically underenrolled; and

(ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled under paragraph (3)(A).

(B) WAIVER OR LIMITATION OF REDUCTIONS- The Secretary may, as appropriate, waive or reduce the percentage recapturing, withholding, or reduction otherwise required by subparagraph (A), if, after the implementation of the plan described in paragraph (3)(B), the Secretary finds that--

(i) the causes of the enrollment shortfall, or a portion of the shortfall, are related to the agency's serving significant numbers of highly mobile children, or are other significant causes as determined by the Secretary;

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(iii) EARLY HEAD START PROGRAMS- If such funds are derived from an Early Head Start program in a State, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Early Head Start programs in that State. If such funds are derived from an Indian Early Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Early Head Start programs.

(iv) OTHER HEAD START PROGRAMS- If such funds are derived from a Head Start program in a State (excluding programs described in clauses (i) through (iii)), then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Head Start programs (excluding programs described in clauses (i) through (iii)) that are carried out in such State.

(B) ADJUSTMENT TO FUNDED ENROLLMENT- The Secretary shall adjust as necessary the requirements relating to funded enrollment indicated in the grant agreement of a Head Start agency receiving redistributed funds under this paragraph.