



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Head Start | Region 12 | 330 C St SW, 4th Floor, Washington DC 20201 | eclkc.ohs.acf.hhs.gov

August 26, 2024

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

Re: Grant No. 90CM009853

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. Due to the nature of Migrant and Seasonal programs enrollment determinations are based on cumulative enrollment at the end of the budget period. 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 Migrant 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 September 5, 2025.

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, Linda Cooper, 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 12 consecutive months. If this is achieved, a Completion Letter at the end of the 12 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 Migrant Head Start program is underenrolled by 93 slots. If OHS were to decrease your funded enrollment according to this figure, it would equate to recapturing \$1,851,937 from your Migrant 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,

/Sandra Carton/

Regional Program Manager  
Office of Head Start, Region 12

## 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.