



ADMINISTRATION FOR
CHILDREN & FAMILIES

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

December 13, 2024

Mr. Federal Glover, Chair, Contra Costa County Supervisor, District 5
Contra Costa County Community Services
1470 Civic Ct
Ste 200
Concord, CA 94520-5242

Re: Grant No. 09CH012839

Dear Mr. Glover,

We are writing to inform you that the Office of Head Start (OHS) has designated Contra Costa County, Grant No. 09CH012839, chronically underenrolled, pursuant to Section 641A(h)(5) of the Head Start Act. Given the measurable progress towards full enrollment, OHS will not reduce Contra Costa County base grant at this time. However, please be advised that OHS recognizes that your agency will likely have unobligated funds at the end of the current fiscal year, and that these funds may be subject to recapture. As a reminder, you have the option to apply for a Change in Scope to reduce your funded enrollment and apply funds to other budget line items that will address under-enrollment, such as compensation for staff.

Background:

On April 12, 2023, OHS conducted an underenrollment meeting with Contra Costa County to identify the underlying issues and challenges preventing the achievement of full enrollment in its Head Start Preschool and Early Head Start Programs. As a result of the meeting, Contra Costa County, in collaboration with OHS, implemented a 12-month plan to achieve and maintain its funded enrollment. However, Contra Costa County did not achieve at least 97 percent enrollment at the completion of the 12-month period.

Section 641A(h)(5)(A) of the Head Start Act authorizes OHS to review and adjust the funding and enrollment of grant recipients determined to be "chronically underenrolled." Specifically, if after receiving technical assistance and implementing a plan to correct underenrollment for a period of 12 months, a grant recipient remains enrolled at less than 97 percent of funded enrollment, the Secretary may (i) designate the grant recipient 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.

Pursuant to Section 641A(h)(5)(B) of the Head Start Act, OHS has determined that Contra Costa County is eligible for a waiver from the recapture, withholding, or reduction of its base grant according to (ii) the shortfall can reasonably be expected to be temporary.

OHS remains committed to continuing to support Contra Costa County in achieving and maintaining full enrollment

while maintaining the highest quality of services for children and families. Therefore, OHS will watch your program's Head Start Preschool and Early Head Start Programs enrollment for six months and continue to provide technical assistance as needed. Continued eligibility for the waiver will be re-evaluated in six months. Monthly enrollment must continue to be reported by center and program option using the Center Level Reporting Spreadsheet until further notice. Once your program is able to achieve and maintain at least 97 percent enrollment for six consecutive months, a Chronically Underenrolled Designation Removal Letter will be issued. This letter will serve as official notice that the designation of "chronically underenrolled" has been lifted.

Please be advised that the inability to achieve and maintain at least 97 percent enrollment for six consecutive months following this "chronically underenrolled" designation **may** result in OHS taking further action to reduce Contra Costa County's base grant and funded enrollment pursuant to Section 641A(h)(5) of the Head Start Act.

Please contact your Regional Office if there are any questions or concerns. Thank you for all that you do on behalf of children and families.

For more information about the chronically underenrolled designation, please see [ACF-PI-HS-18-04](#).

Sincerely,

/ Heather Wanderski/

Heather Wanderski
Director, Division of Program Operations
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.