



January 19, 2024

Office of Head Start
Attn: Director of Policy and Planning
330 C. Street SW, 4th Floor
Washington, DC 20201

To Whom It May Concern,

The Arizona Head Start Association (AZHSA) welcomes the opportunity to respond to the Notice of Proposed Rulemaking (NPRM) "Supporting the Head Start Workforce and consistent Quality Programming" published by the Office of Head Start (OHS) on November 20, 2023.

The following comments and recommendations are a compilation of responses from Grantees across Arizona.

Workforce Compensation, Benefits, and Wellness

Comment

AZHSA strongly agrees that staff salaries need to reflect a living wage, and staff should be compensated fairly compared to similar positions within school districts and other early childhood organizations. The NPRM appears to focus mainly on teachers and instructional assistants but does not include other vital positions within programs, such as content area specialists and front-line and administrative staff. This could lead to challenges in establishing pay parity for programs that cover multiple school districts and counties.

Grantees in Arizona work hard to provide staff with comprehensive, affordable health and mental health care benefits based on employee's needs. Smaller grantees and non-profits must extend a large portion of the monthly premium to employees to cover the high cost of healthcare services, which results in some employees being unable to provide health coverage for their entire family. Due to the prescriptiveness of this

proposal, more staff could be forced to do the same, leaving more families without health care coverage. Availability of services varies across Arizona, and many Grantees in rural areas do not have physical access to specialty or extensive health care and mental health services, making compliance with this proposed rule challenging.

The consensus of Grantees in Arizona is to stay aligned with the federal Family Medical and Leave Act.

While AZHSA agrees with full implementation of pay and benefits parity by 2031, it would be helpful to have benchmarks or checkpoints over the seven-year ramp-up period to ensure Grantees can successfully meet the requirement. Factions within Arizona are currently engaged in statewide fiscal mapping and strategic financing activities. Grantees would like the opportunity to leverage the data gleaned from the process, which includes revenue research and cost modeling, to inform and prepare for this ask. The concern arises from a similar process when all Grantees were required to provide full-day duration programming, which has yet to come to fruition.

Staff Health and Wellness

Comment

AZHSA Grantees focus on staff health and wellness based on the needs of employees and would like to continue providing staff wellness services in this manner. Mandating breaks could create a hardship on staffing. All grantees realize and understand the need for regular staff breaks due to the staffing shortage, which makes it difficult for classrooms to remain open for children and staff to take various breaks throughout the day. Arizona Grantees would like the option of providing breaks based on the needs of staff and students in the program.

Parent and Family Engagement in Education and Child Development Services; Engaging Parents and Family Members

Comment

Grantees in Arizona have modernized processes and procedures using the latest technology but are also sensitive to the technology levels of families. Guidance in this

area is preferred over regulation or mandate to ensure programs can continue to meet the needs of the families they serve.

Family Partnership Services

Comment

Family services staff caseloads vary based on program community needs. Most Grantees are able to keep caseloads between 40 and 50 families and would like to remain at this level based on program needs and staff's job duties.

Determining, Verifying, and Documenting Eligibility; Verifying Eligibility

Comment

The proposal to adjust a family's gross income based on housing expenses is welcomed, but verifying and calculating thirty percent of a family's housing costs could be challenging for staff. The recommendation would be to adopt a localized excess housing cost based on the area.

AZHSA recognizes that the proposed changes are in the best interest of families and staff and applauds the Office of Head Start for considering these needs. While these proposed changes seem to provide needed benefits, the prescriptive manner in which they are written will increase workloads, create challenges, and potentially restrict a Grantee's ability to meet the needs of the community they serve. AZHSA would like to see these proposed changes implemented through guidance and allow Grantees to implement the new rules based on the program and community's needs.

Sincerely,

Arizona Head Start Association