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**INFORMATION MEMORANDUM**

**TO:** All Head Start and Early Head Start Agencies and Delegate Agencies

**SUBJECT:** Head Start Categorical Eligibility for Families Eligible for the Supplemental Nutrition Assistance Program

**INFORMATION:**

The Administration for Children and Families (ACF) strives to ensure that programs minimize the burden on families seeking public assistance and to coordinate benefit programs in such a way that families who are eligible for one benefit program can more easily participate in other services for which they are eligible. ACF issues this Information Memorandum (IM) to set forth its interpretation of the phrase “public assistance” in Sec. 645 of the Head Start Act to include the Supplemental Nutrition Assistance Program (SNAP). Adopting this interpretation will make it easier for eligible families to enroll children in Head Start services by allowing families to demonstrate proof of SNAP receipt or eligibility to enroll in Head Start and will simplify the process of determining program eligibility for grantees.

For the purposes of Head Start eligibility determination, the Office of Head Start (OHS) will expand its interpretation of “public assistance,” as used in the Head Start statute, to include SNAP. OHS’s interpretation of the statute has been to consider only Temporary Assistance for Needy Families (TANF) and Supplemental Security Income (SSI) as public assistance. Previously, we had not considered including SNAP in this definition because it had slightly higher income threshold than the base income threshold for Head Start services. However, recently there has been a sharp reduction in families that establish eligibility through the current public assistance definition, so we have reconsidered this interpretation to make the public assistance route more available to families and grantees.

Upon issuance, this IM adds SNAP to public assistance to determine recipients as categorically eligible for Head Start programs. Recently, we have found that SNAP households with young children have equivalent level of need to families currently receiving Head Start services<sup>1</sup>. Note that this approach does not guarantee a SNAP recipient enrollment in a Head Start program. Programs must adhere to their recruitment and selection criteria to ensure they prioritize enrollment for those who may benefit most from Head Start services. The sole purpose of this

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<sup>1</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2019. Alexandria, VA, 2021.

document is to make clear that Head Start programs can consider SNAP as public assistance for purposes of determining Head Start eligibility.

### **Enhanced Public Assistance Eligibility to Support Enrollment**

Congress established Head Start eligibility criteria in [Sec. 645\(a\)\(1\)\(B\)\(i\)](#) of the Head Start Act to include families with incomes at or below the federal poverty level and families that are eligible for public assistance. Congress also allowed for other categorical eligibility allowances which consider family need rather than income. For example, children experiencing homelessness and children in foster care are categorically eligible for Head Start services.

The interpretation provided herein, that SNAP is considered public assistance” for purposes of section 645(a)(1)(B)(i) of the Head Start Act, does not change statutory eligibility criteria. Given the flexibilities inherent in the statute and the duty of programs to ensure they are serving the most needy families in their communities ([45 CFR §1302.13](#)), the primary effect of this IM is to eliminate barriers to families who are already eligible for, and in many cases already enrolled in, Head Start services by providing a streamlined way for such families to demonstrate eligibility. Moreover, inclusion of SNAP as public assistance reduces the challenge of navigating multiple federal program eligibility processes and supports better alignment and coordination across federal programs, a factor that President Biden’s [Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government](#) called for federal agencies to consider.

Since 2015, the share of families enrolling in Head Start services based on the statute’s public assistance receipt prong has declined from 16% of the total enrollment to just 10% in 2019. This drop represents more than 50,000 slots and comes at a time when there have been vacant Head Start slots. This has caused unnecessary burden for families and grantees during eligibility determinations and needlessly undercuts the use of public assistance categorical eligibility and has impacted the number of vacant slots. The need for public assistance and the share of Head Start participants receiving public assistance has remained stable over the same timeframe despite the decline in programs using public assistance categorical eligibility. Between 2015 and 2019, nearly half of Head Start enrollees were also receiving SNAP benefits. The addition of SNAP would greatly facilitate the enrollment of children on SNAP who have demonstrated the need for services. Furthermore, the interpretation put forth in this IM will reduce undue burden in the eligibility determination process for these children and their families.

This interpretation is reasonable under the statute, and it furthers the important policy goal of better reaching families who could already benefit from Head Start services but are not currently enrolled. The great majority of young children in SNAP households are in families with incomes below 100% of poverty; but currently, these families must document their income eligibility, which can be burdensome to both families and grantees. Documenting income eligibility requires a large number of pay stubs or other income documentation while SNAP eligibility can be determined by a single document. Allowing programs to count receipt of SNAP as establishing categorical eligibility will reduce these administrative burdens and improve access for these families.

Most (about 3 million) of these families, according to SNAP data, have incomes at or below 100% of the poverty line.<sup>2</sup> This IM provides a new way for such families to more easily prove their eligibility. Some SNAP recipients (about 600,000) have family incomes above the 100% poverty line but only about 150,000 of these families have incomes above 130% of the poverty line. Those families with incomes above 100% but below 130% of poverty could already be eligible for Head Start services through existing allowances for programs to enroll families above the 100% of the poverty line with demonstrated need for program services.

Importantly, all Head Start programs must continue to use their selection criteria to prioritize the enrollment of the families most in need of services as required in 45 CFR §1302.13. Therefore, the inclusion of SNAP is unlikely to substantially expand the number of Head Start participants with incomes exceeding 100% of poverty.

This interpretation also facilitates cross-program recruitment and eliminates duplicative and burdensome paperwork for families who are already eligible for a federal public assistance benefit. Removing the frustration of multiple eligibility processes will allow families to easily access the vital early childhood services that Head Start programs provide.

### **Implementation of Policy Guidance**

Upon issuance of this IM, public assistance includes SNAP for purposes of determining categorical eligibility. Head Start programs can use this guidance in determining eligibility and in enrolling those children that met their selection criteria consistent with the Head Start Program Performance Standards at [45 CFR §§1302.10-16](#). If a program has vacant slots, this guidance can support enrolling additional families.

To verify SNAP receipt or potential eligibility, a program would need to examine and maintain a copy of documentation from the state, local, or tribal public assistance agency as required in [45 CFR §1302.12\(i\)\(2\)](#). For example, a family could present a copy of notice of approval, other documentation of eligibility or benefits from the SNAP agency, or an Electronic Benefit Transfer card with SNAP ID number to become categorically eligible for Head Start services.

Programs should consider revisiting their [Eligibility, Recruitment, Selection, Enrollment, and Attendance \(ERSEA\)](#) policies and procedures in light of this guidance. Policies and procedures must always support a program's eligibility determinations to ensure they are meeting all requirements under 45 CFR §1302. Annual review of the community needs assessment at 45 CFR §1302.11(b) will allow programs to determine if, based on SNAP recipients in the community, they need to address their selection criteria as previously referenced. Programs may also examine community partnerships and outreach efforts for ways to encourage SNAP recipients to apply for Head Start services.

Please refer any questions to your ACF regional office.

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<sup>2</sup> Ibid

Thank you for your work on behalf of children and families.

/ Dr. Bernadine Futrell /

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