PROGRAM INSTRUCTION

TO: Head Start and Early Head Start Grantees

SUBJECT: Administrative Simplification for Consolidating Head Start Grants, Including Early Head Start-Child Care Partnerships

INSTRUCTION:
On December 19, 2019, the Office of Head Start (OHS) published ACF-PI-HS-19-02 Administrative Simplification for Consolidating Head Start Grants. That Program Instruction informed grantees operating multiple Head Start grants of their ability to request to consolidate all of their grants into one grant or, at a minimum, consolidate two or more grants. The goal of that Program Instruction was to reduce the administrative and financial burden associated with managing multiple grants. It also described the benefits and risks of consolidating multiple grants.

This instruction expands on ACF-PI-HS-19-02 by providing an additional option for consolidation. The option is intended primarily for grantees that have both a traditional Head Start or Early Head Start grant and an Early Head Start-Child Care (EHS-CC) Partnership grant.

Background
Prior to fiscal year 2020, grantees requesting to consolidate multiple Head Start grants were limited to consolidating those that shared the same project code. These project codes include CH, CI, or CM for grant award numbers that operate traditional Head Start or Early Head Start programs, and HI, HM, or HP for grant award numbers that operate EHS-CC Partnership and Early Head Start Expansion programs.

Since the inception of the EHS-CC Partnership and Early Head Start Expansion programs, each appropriation set aside funding specifically for these programs. This required accounting of the program funding separate from the grant award funding associated with traditional Head Start and Early Head Start programs. The Further Consolidated Appropriations Act, 2020 (Public Law 116-94) provided greater flexibility by not delineating all of the funding for the EHS-CC Partnership and Early Head Start Expansion programs separately. This appropriation only delineated new funding of $100 million specifically for EHS-CC Partnership and Early Head Start Expansion programs for new awards scheduled to be made in the winter of 2021.
Effective immediately, grantees may include multiple Head Start grants across all project codes in their consolidation requests. It is now possible for a grantee to have one grant for the operation of all of its programs, including Head Start, Early Head Start, and EHS-CC Partnerships. In these cases, the primary grant that assumes all approved funding, slot levels, service areas, and options will remain with the traditional Head Start grant or award number with project codes of CH, CI, or CM.

During the grant consolidation process, project period end dates are subject to change. The grant with the oldest project period — typically the grant scheduled to end the soonest — becomes the primary grant. If this grant is that of the EHS-CC Partnership, the traditional project will assume the project period end date of the EHS-CC Partnership grant, along with all approved funding, slot levels, service areas, and options included in the consolidation.

To further explain, take for example a consolidation between a CH project scheduled to end June 30, 2025, and an HP project scheduled to end June 30, 2024. During the consolidation, the CH project becomes the primary grant. However, the project end date will be adjusted to June 30, 2024, to prevent any component of the consolidated award from exceeding the five-year limit on a grant.

**Early Head Start-Child Care Partnership Slots**
If EHS-CC Partnership grants are consolidated with other grants, grantees will be required to document the number of EHS-CCP slots in the annual applications. For end-of-month enrollment reporting in the Head Start Enterprise System (HSES), grantees will continue to include partnership slots in the total count for Early Head Start.

**Request to Consolidate Grants**
Grantees interested in consolidating multiple Head Start or EHS-CC Partnership grants should contact their Regional Office to learn more about the options available. Along with the many benefits that come with consolidating multiple grants, grantees will continue to assume some risks that accompany the decision to operate under one award. These benefits and risks are further described in ACF-PI-HS-19-02.

**Right of Refusal**
The Administration for Children and Families continues to reserve the right to deny or delay approval of requests to consolidate Head Start or EHS-CC Partnership grants.

Please contact your Regional Office should you have questions about requesting to consolidate grants.

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

/ Dr. Deborah Bergeron /

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