



Office of Children  
and Family Services



Council on Children  
and Families

SUZANNE MILES-GUSTAVE, ESQ.  
Acting Commissioner

KATHY HOCHUL  
Governor

VANESSA THREATTE  
Executive Director

January 19, 2024

Office of Head Start  
Administration for Children and Families  
U.S. Health and Human Services  
Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>.

**Re: 88 FR 80818  
Proposed Information Collection Activity; Supporting the Head Start Workforce and  
Consistent Quality Programming (ACF-118; RIN 0970-AD01)**

To Whom It May Concern:

The New York State Office of Children and Family Services (OCFS) and the New York State Council on Children and Families (CCF) (which is responsible for the New York State Head Start Collaboration Project) are pleased to submit the following comments in response to the above-referenced proposed information collection activity that was published in the Federal Register, 88 FR 80818, on November 20, 2023. OCFS and CCF are pleased with the proposed addition of these requirements to the Head Start Program Performance standards, though they recognize that the requirements should extend to all of the child care workforce, as the support and stabilization is much needed throughout the entire child care workforce. Without increased funding to both Head Start programs and the CCDF lead agencies, programs will struggle to implement these supports and services. We appreciate the proposed standards and remain concerned about how the impact of their implementation might further bifurcate the child care ecosystem in New York.

In 2023, there were 276 Head Start grantees in New York, with the total funded enrollment of 45,390 slots for Head Start and Early Head Start. These slots account for 6.7% of the child care capacity in NYS, which has over 17,000 licensed child care providers. OCFS licenses all family child care in NYS and all center-based care outside of New York City. These proposed Head Start performance standards will affect both settings and without additional direct support, family child care programs will struggle to achieve them. New York has a strong commitment to family child care programs and supports all efforts to increase their resources and services, and while the supports proposed in the NPRM are critical, without funds and implementation support, family child care programs could be disproportionately impacted and result in a loss of their participation in Early Head Start partnerships.

We also encourage the Administration for Children and Families to think holistically when proposing rules on child care programs, as no program or state operates independently. All early childhood educational environments need investments to support their critical workforce, both financially as well as their health and wellbeing. Without additional funds for programs and for states, these proposed rules will be a challenge to implement and cause further complexity in an already complex system.

Thank you for the opportunity to provide these comments. Should you have any questions or need further clarification, we would be pleased to provide additional information.

Sincerely,

A handwritten signature in black ink that reads "Nora Yates" with a long horizontal flourish extending to the right.

Nora Yates  
Deputy Commissioner  
Division of Child Care Services  
NYS Office of Children and Family Services

A handwritten signature in black ink that reads "Elana Marton" with a long horizontal flourish extending to the right.

Elana Marton  
Deputy Director and Counsel  
NYS Council on Children and Families