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The Honorable Dominic Mancini
Deputy Administrator
Office of Information and Regulatory Affairs
U.S. Office of Management and Budget

RE: OMB Review, Head Start Program Grant Application, OMB Control No: 0970-0207

Dear Deputy Administrator Mancini,

We wish to share a relevant consideration stemming from President Biden's *Executive Order on Worker Organizing and Empowerment*.¹ The Task Force formed by that Executive Order recommends that the Department of Health and Human Services "seek to encourage and enhance worker organizing and collective bargaining through its grant programs, consistent with applicable law, with a phased approach across agencies."² ACF should move quickly to implement this recommendation for the Head Start program by adding an addendum and committing to revisit within a year ACF's Submission for OMB Review, Head Start Program Grant Application, OMB Control No: 0970-0207 published in the Federal Register on April 22, 2022.³

The 75,000 child care and early learning workers represented by the Service Employees International Union are, like all child care and early learning workers who endured enormous hardships, heroes. Throughout the pandemic, SEIU members proved steadfast partners to an industry in crisis. Not only did SEIU members provide high quality care to families in need, but they mobilized to advocate for emergency relief, disseminate information and technical assistance to the rest of the workforce, share feedback from the frontlines with decision-makers, and assist Lead Agencies in designing and administering relief programs, including by advancing bedrock funding and rate increases that saved many providers from collapse and families from disruptions in their care arrangements.

President Biden recognized the uniquely important role of labor unions in giving workers a voice and ensuring industries work for all by signing the *Executive Order on Worker Organizing and Empowerment* which declared it "the policy of my Administration to encourage worker organizing and collective bargaining."⁴ It established a task force to identify actions across the executive branch that support worker power, worker organizing, and collective bargaining, and which released a report with recommendations on February 7, 2022.

¹ Executive Order No. 14025, 86 Fed. Reg. 22829 (April 26, 2021), <https://www.federalregister.gov/documents/2021/04/29/2021-09213/worker-organizing-and-empowerment>

² White House Task Force on Worker Organizing and Empowerment, *Report to the President* (February 7, 2022), <https://s3.documentcloud.org/documents/21198625/white-house-task-force-worker-organizing-and-empowerment-report.pdf>

³ Head Start Grant Application; Submission for OMB Review (OMB #0970-0207), 87 Federal Register 24168 (April 22, 2022), <https://www.govinfo.gov/content/pkg/FR-2022-04-22/html/2022-08651.htm?cid=2ef0c1f51c7a324ee5fa0b864a5e4f94>

⁴ *Executive Order*, pg. 22829

Organizing and empowering the child care and early learning workforce now is critical for the viability of the child care industry. Even before the pandemic drove over 120,000 early educators and tens of thousands of providers out of the field,⁵ there had been a shortage of child care and early education workers, contributing to widespread problems of access and affordability. Giving the workforce more of a say in the work they love through unions and collective bargaining will help to create careers that attract workers back into the field.

The Task Force report recommends that the Department of Health and Human Services "seek to encourage and enhance worker organizing and collective bargaining through its grant programs, consistent with applicable law, with a phased approach across agencies."⁶ Consistent with this recommendation, ACF should revise all Head Start program grant application forms to require grantees to demonstrate a commitment to worker organizing, collective bargaining, and union engagement, which requires **adding an addendum and committing to revisit within a year ACF's Submission for OMB Review, Head Start Program Grant Application, OMB Control No. 0970-0207**. Based on SEIU's three decades of organizing and representing Head Start workers, notices of funding opportunities should encourage labor neutrality, card-check recognition, collaborative and good-faith bargaining practices including joint bargaining by multiple grantees with workers in the same geographic area, third party arbitration at impasse, access to worker contact info, worksite access for organizers, and succession clauses requiring worker retention and union recognition in cases of grantee transition.

Thank you for taking into consideration the challenges to organizing and empowering the Head Start workforce. Please reach out to SEIU Public Services Division Policy Director Garrett Schneider (garrett.schneider@seiu.org) with any additional questions.

Sincerely

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⁵ Bureau of Labor Statistics, *Employment Time Series Data Viewer*, U.S. Department of Labor (Accessed May 12, 2022), <https://beta.bls.gov/dataViewer/view/timeseries/CES6562440001>

⁶ *Task Force Report* pg. 33