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Comments Received:

The Council for Professional Recognition (the Council), which administers the Child Development Associate® (CDA) credential, support efforts by the Office of Head Start (OHS) to reduce unnecessary paperwork; however, the CDA is a critical credential for early childhood educators, and the application must still capture how programs support staff in obtaining and maintaining this qualification.

Positive aspects

Reduced paperwork encourages program focus on staff development: OHS explains that the updated grant application will reduce the amount of documentation required in applications by decreasing the number of supporting documents and shortening the program and budget narratives. Simplifying the application may free program staff to devote more time to supporting educators' professional growth, including preparation for the CDA.

Greater clarity through standardized prompts: The new narrative format's specific prompts can help programs succinctly describe their workforce qualifications. A consistent format will allow OHS to compare how programs support CDA candidates and identify gaps more easily.

Concerns and negative impacts

Loss of the Professional Development Plan and Improvement Plan attachments: The proposal eliminates the requirement to submit individualized PD plans and selfassessment improvement plans. These are critical for tracking how staff will achieve or renew their CDA credentials. Without them, grantees may not plan adequately to ensure staff attain proper credentialing. We recommend a brief narrative to ensure staff development is still addressed.

30 page narrative limit may constrain workforce details: Limiting the program and budget narrative to 30 pages may force programs to omit information about workforce qualifications, PD activities, and CDA attainment. OHS should clarify that summaries of staff qualifications and plans to support workforce development be included in the page limit or allowed as an attachment that does not count toward the limit. Without such clarity, programs may underreport workforce investments, undermining the goal of a qualified workforce.

Reduced documentation might obscure compliance with CDA requirements: The Head Start Program Performance Standards require that all staff in family child care settings meet the family child care provider qualifications. The grant application should require applicants to demonstrate how many staff currently hold a CDA or equivalent and how many are enrolled. Without this information, OHS may lack a clear picture of compliance.

Deemphasis of professional development: Removing the requirement for a program calendar and other supporting documents may signal that PD activities are less important. This could reduce the emphasis on ensuring educators receive ongoing training.

Conclusion

As we administer the CDA credential, we are committed to strengthening the ECE workforce. We support OHS's efforts to streamline the Head Start grant application and reduce administrative burden. To ensure that these changes do not weaken investment in teacher qualifications or compliance, we urge OHS to maintain a focus on workforce development by requiring programs to summarize their plans and progress toward staff credentialing and by clarifying how workforce information should be presented within the new narrative. With these adjustments, the new application can lighten administrative workloads and sustain high standards for the educators.