

Governance and AI in Head Start

Ensuring Ethical, Compliant, and Purpose-Driven AI Innovation

As Head Start programs explore the use of Artificial Intelligence (AI) to strengthen operations, compliance, and family and child outcomes, the role of governance becomes critical. Governing Body and Policy Council leaders must ensure AI is used responsibly, ethically, and in alignment with the Head Start Program Performance Standards (HSPPS) and federal expectations around child and family data privacy.

AI **does not replace human judgment** — it enhances it.

This document outlines the responsibilities and considerations for governance in AI adoption and oversight.

Key Governance Responsibilities for AI in Head Start

| Area | Governance Responsibility |
|---|---|
| Strategic Direction & Planning | Ensure AI supports the agency mission, PFCE goals, school readiness outcomes, and continuous improvement. Approve AI integration plans aligned with strategic priorities. |
| Compliance & Ethics Oversight | Ensure AI use complies with: |

- Head Start Program Performance Standards
 - FERPA, COPPA, and other privacy laws
 - Federal cybersecurity and confidentiality expectations
 - Organizational data-security and ethics policies
- Data Privacy & Security** - Review and approve policies protecting Personally Identifiable Information (PII). Ensure AI systems do not compromise sensitive child, family, or staff data.
- Fiscal Oversight** - Review and approve AI-related contracts and technology purchases. Ensure cost-effective and allowable expenditures.
- Risk Management** - Evaluate risks related to bias, fairness, data misuse, unauthorized access, and accuracy of AI-generated information. Ensure risk mitigation protocols.
- Policy Approval** - Approve policies covering:
- AI usage guidelines
 - Staff training and accountability
 - Data storage, access, retention, and deletion
 - Breach reporting
- Staff Training Requirements** - Ensure staff receive annual training on:
- Ethical and compliant AI use

- Protecting PII
 - Identifying misuse or breaches
 - Responsible decision-making using AI insights
- Parent & Community Engagement** - Ensure transparency with families on how technology supports program operations and child learning while safeguarding data. Approve communication and consent procedures.

Governance Focus Areas

| Leadership Function | AI Oversight Role |
|----------------------------|--|
| Strategic Leadership | Guide how AI enhances quality services and compliance. |
| Accountability & Oversight | Monitor AI implementation and outcomes. |
| Equity & Access | Prevent bias and ensure fairness in AI-supported decisions (ERSEA, family services, etc.). |
| Transparency & Trust | Ensure families and staff understand how AI is used responsibly. |

Shared Governance in AI Decision-Making

Head Start's shared governance structure applies to AI:

| Role | Responsibility |
|------------------------|--|
| Governing Body | Legal, fiscal, policy approval, technology oversight |
| Policy Council | Program direction & parent voice in tech decisions |
| Management Team | Implement AI systems, train staff, ensure daily compliance |

Questions Governance Should Consider

- Does this AI tool protect children's and families' privacy?
- Does it improve service quality, or efficiency?
- How will staff be trained?
- What safeguards prevent bias or errors?
- Are there clear procedures if AI outputs are incorrect?
- How will families be informed and included?

AI in Head Start must support—not replace—human relationships, professional judgment, and culturally responsive services.