



**Updates to the Performance Standards:  
Nurturing the Promise**

*August 28, 2024*

# OUR GOALS



- Attract and retain high-qualified workforce
- Respond to increasing mental health needs
- Address other areas of program quality improvements
- Effectively meet evolving needs of the communities we serve



# STRONGER TOGETHER



- These **updated standards** are responsive to feedback from the public
- **We made changes** to promote flexibility, reduce administrative burden, and clarify intent
- The updated Head Start Program Performance Standards ensure high-quality services while allowing programs to meet their **unique community needs**



# OVERVIEW OF FINAL RULE



## Workforce

New requirements:

- Wages
- Benefits
- Staff wellness
- Employee engagement

## Mental Health

Enhanced requirements:

- Fully integrate mental health into Head Start requirements
- Require multi-disciplinary approach
- Address barriers to obtaining mental health consultation

## Quality Improvement

New or enhanced requirements:

- Family service worker caseloads
- Identify and meet community needs
- Child safety
- Adjust for excessive housing costs
- AIAN & MSHS eligibility



# WORKFORCE: WAGES



## Policy Goal: Promote **wages** that reflect the value of Head Start staff

*By August 1, 2031:*

- Must establish or update a **pay structure that promotes competitive wages** for all positions
- Education staff must be paid an **annual salary comparable to public school preschool teachers**
  - To make progress towards pay parity for Head Start education staff with K-3<sup>rd</sup> grade teachers
  - Must consider responsibilities, qualifications, experience, and hours worked
  - May use alternative benchmark of 90% of kindergarten teacher salaries
- Minimum pay for all staff must be at least sufficient to **cover basic costs of living** in the local area
- Wages must be **comparable across Head Start Preschool and Early Head Start**
  - For staff with similar qualifications and experience

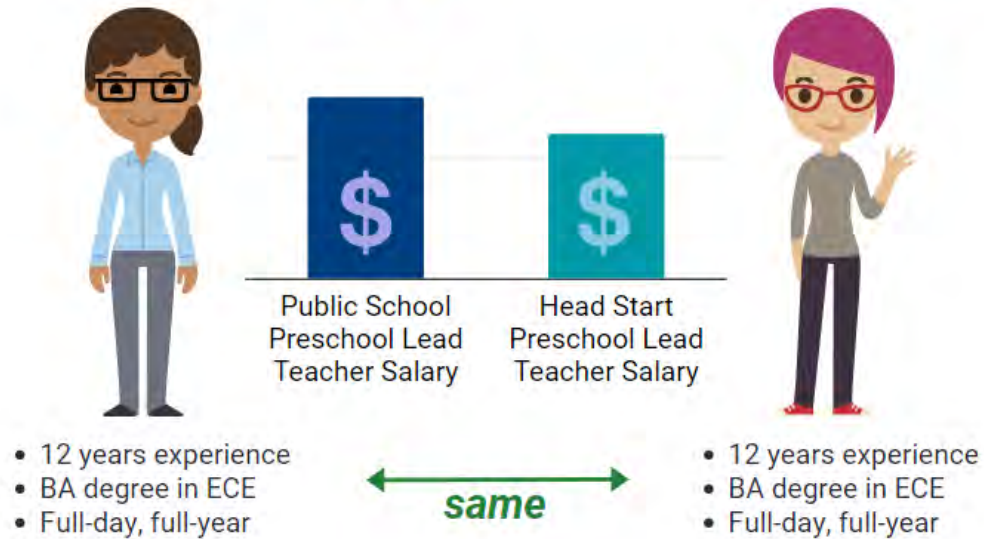


# PAY PARITY

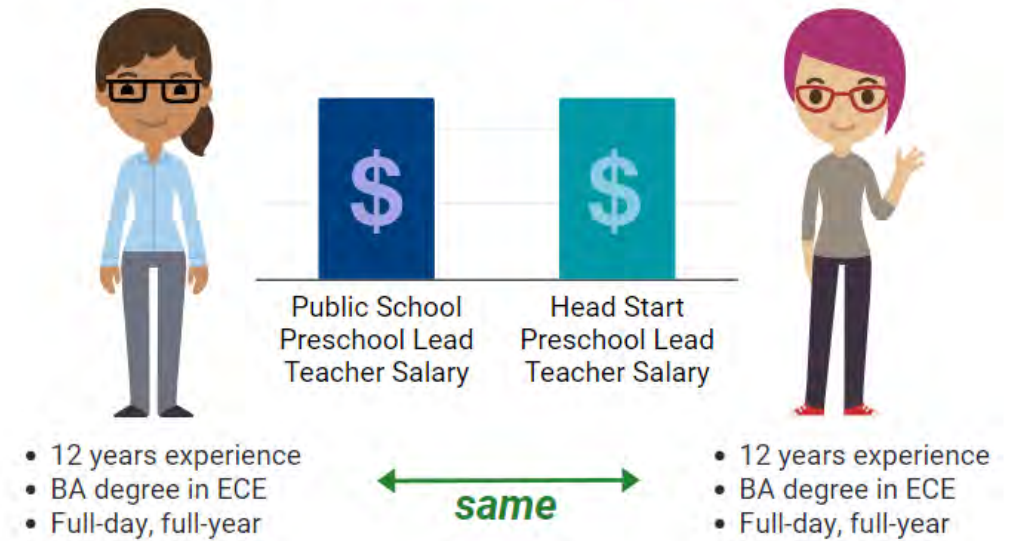


## What does parity look like?

Is this pay parity? **NO**



Is this pay parity? **YES** ✓



# PAY PARITY



Programs can adjust salaries based on schedule/hours worked.

Is this pay parity? **YES** ✓



Public School  
Preschool Lead  
Teacher Salary



Head Start  
Preschool Lead  
Teacher Salary



- 4 years experience
- Bachelor's degree
- School day, **school-year**



- 4 years experience
- Bachelor's degree
- School day, **full-year**

Is this pay parity? **YES** ✓



Public School  
Preschool Lead  
Teacher Salary



Head Start  
Preschool Lead  
Teacher Salary



- 4 years experience
- Bachelor's degree
- **School day**, school-year



- 4 years experience
- Bachelor's degree
- **Partial day**, school-year



# PAY PARITY

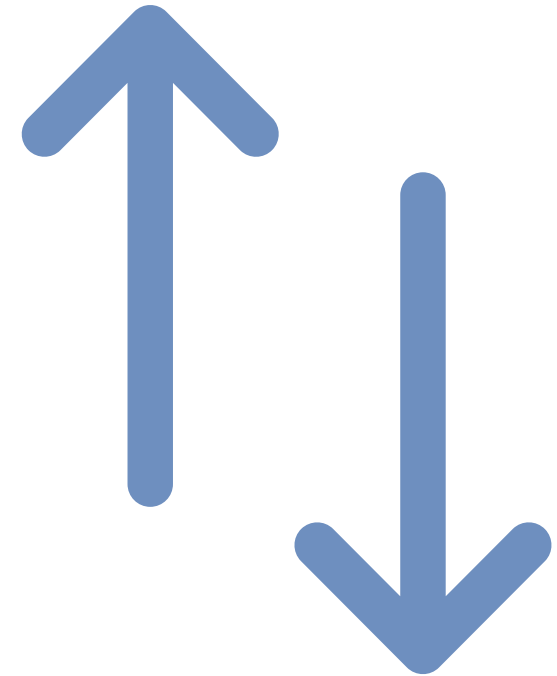


## Head Start programs can adjust salaries based on differences in:

- ✓ Role/ Responsibilities
- ✓ Qualifications
- ✓ Experience
- ✓ Schedule or Hours Worked

## Programs can use an alternative method to identify comparable salaries:

- ✓ Public preschool teacher salaries in neighboring school districts
- ✓ At least 90 percent of public kindergarten teacher salaries



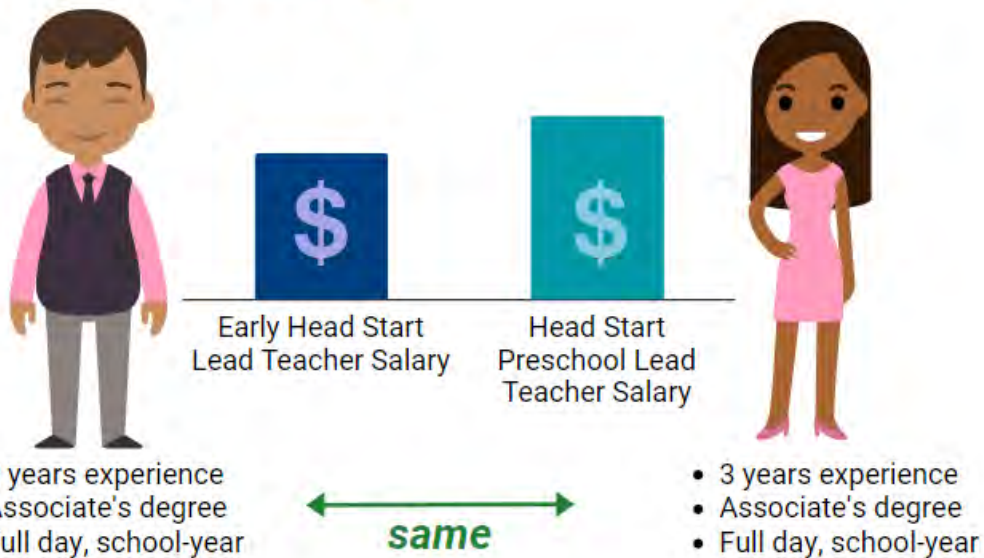


# PAY PARITY

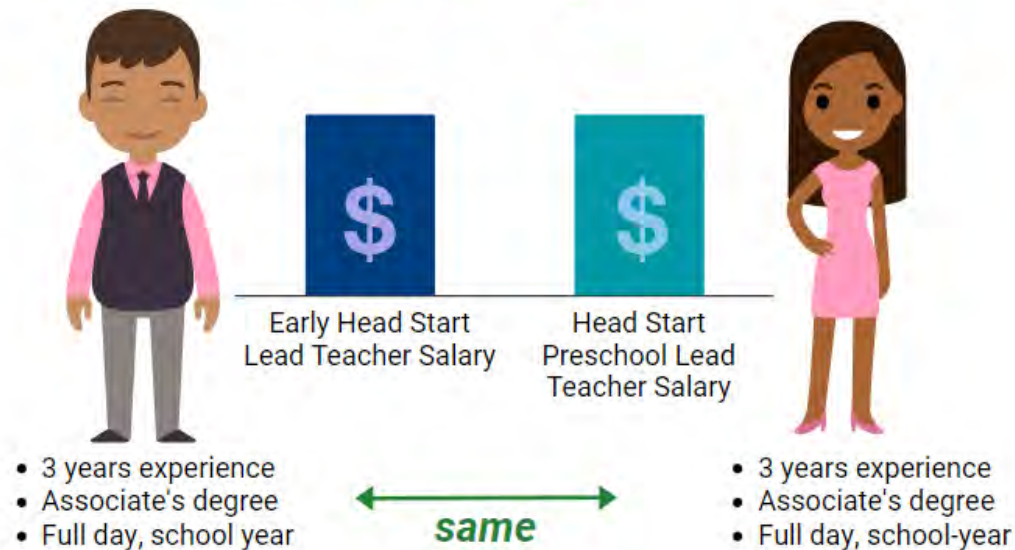


Salaries for comparable staff should not differ across Early Head Start and Head Start Preschool.

Is this pay parity? **NO**



Is this pay parity? **YES** ✓



# WORKFORCE: WAGES



## Responding to Feedback on Wages

- Clarify staff covered by wage policies; alternative method of 90% of kindergarten teacher salaries
- Added a **Secretarial waiver authority for the wage policies** if funding is very low
  - HHS Secretary may establish a waiver process in 2028 if the average annual increase in appropriations for the prior four years is **less than 1.3 percent**
- In order to receive a Secretarial waiver, programs must:
  - Meet **quality benchmarks**, including a strong health and safety record and demonstrated progress on wages
  - Need to reduce **enrolled Head Start slots** in order to implement the wage requirements
  - Continue to **make improvements on wages over time**, to the greatest extent practicable



# WORKFORCE: BENEFITS



## Policy Goal: Strengthen **benefits** for Head Start staff

- Full-time staff (30 hours or more per week):
  - **Health insurance** either through an employer plan or the Marketplace
  - Short-term, free or low-cost **behavioral health services**
  - **Paid leave**
- Part-time staff must be connected with **health insurance options** in the Marketplace
- Connect staff with **child care subsidy** programs and **Public Service Loan Forgiveness**



# WORKFORCE: BENEFITS



## Responding to Feedback on Benefits

- Did not include requirements for:
  - Retirement
  - Paid family leave
- Revised policies to:
  - Reduce prescriptiveness on paid leave requirement
  - Allow more time for implementation of the benefits requirements by extending the compliance timeline from 2 to 4 years



# WORKFORCE



## Responding to Feedback on Workforce

- Added an **exemption for small programs** for the wage and benefit policies
  - Agencies with 200 or fewer total Head Start slots across all grants are automatically exempt
- Small programs must still **make improvements in compensation** over time, to the greatest extent practicable



# WORKFORCE: WELLNESS & ENGAGEMENT



Policy Goal: Strengthen the **health and wellbeing** of the Head Start workforce

## Staff Wellness

- Programmatic culture of wellness promotion and **staff empowerment**
- Staff must receive adequate **breaks**
  - No requirement for unscheduled breaks
  - Length of required breaks is not specified
- No requirement for adult-sized furniture in classrooms



## Employee Engagement

- Management style that **encourages, values, and responds** to employee feedback
- Identify and **address barriers** to high-quality job performance



# Workforce Standards: Phase In Timeline

Head Start programs can increase wages over time to make progress toward pay parity.

August 21, 2024

**Final Rule:** ACF published updated Head Start Program Performance Standards with Final Rule: *Supporting the Head Start Workforce and Consistent Quality Programming*

In 4 Years  
(August 1, 2028)

**Benefits:** For full-time staff (30+ hours/ week): health care coverage; paid leave; short term, free or low-cost behavioral health services. For part-time staff: connection to health care coverage.

In 7 Years  
(August 1, 2031)

**Wages:** Competitive wages & updated salary scale for all staff; annual salaries for education staff w/ preschool teachers in public schools (or 90% of K), adjusted for qualifications, experience, responsibilities, hours worked; comparable wages for infant toddler and preschool educators; pay sufficient to meet basic needs.



# MENTAL HEALTH



**Policy Goal:** Integrate **mental health** into all aspects of program service delivery

## **Multidisciplinary mental health approach** *(by August, 2025)*

- Program-wide integration of mental health supports for children, families, and staff
- Ongoing mental health consultation services at least once per month, with an annual review of consultation services

## **Mental health consultation**

- Role is to build capacity of adults to support children's mental health
- Clarify mental health consultant qualifications
- Reduce barriers to obtaining mental health consultation





# MENTAL HEALTH



Policy Goal: Integrate mental health into all aspects of program service delivery

## Multidisciplinary mental health **team approach** *(by August, 2025)*

- Program-wide integration of mental health supports for children, families, and staff
- Ongoing mental health consultation services at least once per month, with an annual review of consultation services

## Mental health consultation

- Reduce barriers to obtaining mental health consultation by **adding flexibility for monthly requirement to be met by other mental health professionals or behavioral health support specialists**



# MENTAL HEALTH



**Policy Goal:** Integrate mental health into all aspects of program service delivery

## Connecting mental health with other program services

- Integrate mental health into family support services and services for expectant families
- Facilitate proactive mental health screening and follow up for children

## Suspension

- Define and provide clearer requirements for suspension
- No definition or change to policy on expulsion



# QUALITY IMPROVEMENT



**Policy Goal:** High-quality, individualized **family partnership services** and reasonable workloads for family partnership staff

- Establish that no more than 40 families are assigned to each family partnership staff
- Clarify circumstances when programs may exceed the maximum
- Establish waiver process to allow for other high-quality models



# QUALITY IMPROVEMENT



Policy Goal: Ensure responsive, high-quality services for **expectant families**

- Clear tracking and reporting of program services
- Clarify intent of newborn visit and appropriate curriculum
- Help to promote healthy birth outcomes and address racial and ethnic disparities in pre- and postnatal outcomes



# QUALITY IMPROVEMENT



## Policy Goal: Streamline the community assessment

- Strategically plan how to approach and use the community assessment
- Identify and leverage existing data
- Programs decide whether an annual update is needed



# QUALITY IMPROVEMENT



## Policy Goal: Identify barriers to enrollment and attendance

- Understand why children selected for the program do not enroll or attend, including whether **transportation** is a barrier
- Resolve identified barriers where feasible
  - Clarify expectations for resolving barriers



# QUALITY IMPROVEMENT



**Policy Goal:** Better identify families living in poverty who are **eligible for Head Start**

## **Clearly Define Income:**

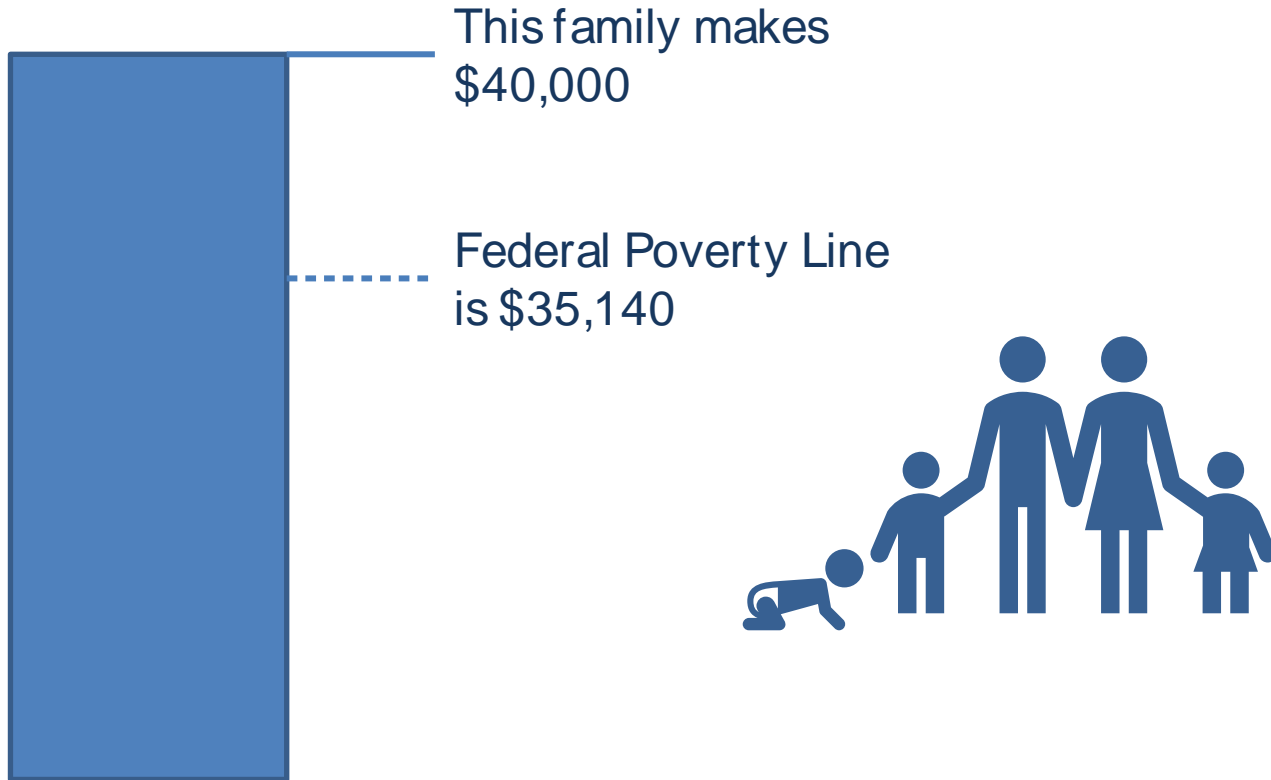
- Provide a concrete list of income sources considered for eligibility

## **Account for High Cost of Living:**

- Excessive housing costs can be deducted from a family's income when determining eligibility



# ADJUSTING FOR EXCESSIVE HOUSING COSTS

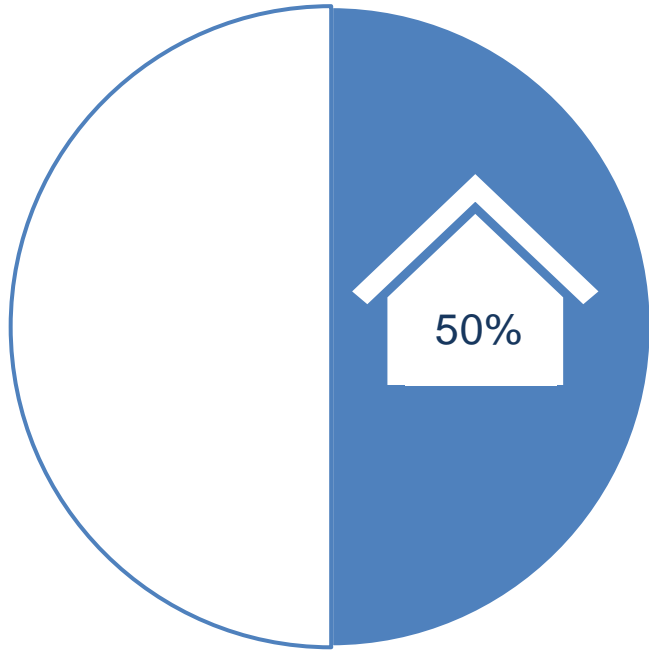


Not below 100% of federal poverty level eligibility criteria

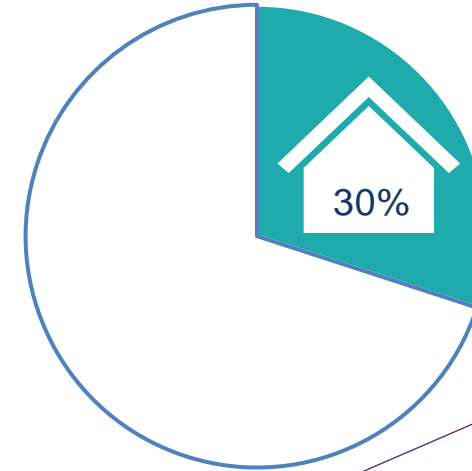




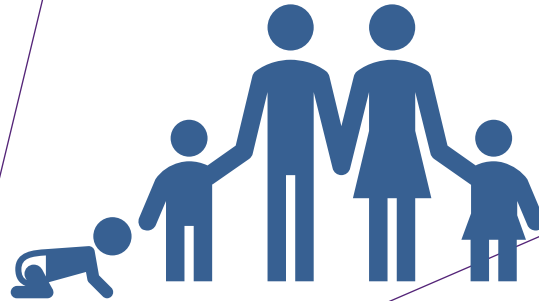
# Programs can now deduct housing expenses OVER 30% of a family's income



They spend 50% of their income\* on housing, \$20,000.



In this case, 30% of their income would be \$12,000



$$\$20,000 - \$12,000 = \$8,000$$

**Housing adjustment = \$8,000**

\*Total family income = \$40,000

# ADJUSTING FOR EXCESSIVE HOUSING COSTS



# QUALITY IMPROVEMENT



## Policy Goal: Align Tribal and MSHS eligibility with **statutory changes**

- ***Tribal Programs***: may determine a pregnant woman or child is eligible for Head Start **regardless of income**
- ***Migrant & Seasonal Programs***: may determine any pregnant woman or child is eligible for Head Start if at least one family member's income comes **primarily from agricultural employment**



# QUALITY IMPROVEMENT



## Policy Goal: Align the standards with the **Head Start Act**

- Ensure at least 10 percent of total **actual enrollment** is filled by children with disabilities
- “*Actual*” replaces “*funded*” to align with Act



# QUALITY IMPROVEMENT



Policy Goal: Protect children from **exposure to lead** in Head Start

- Have a plan to **test for and address lead** in water and paint in Head Start facilities
- **Reduced prescriptiveness to allow for variations in local context**



# QUALITY IMPROVEMENT



## Policy Goal: Increase capacity to promote **child health and safety**

- **Annual staff training** to help prevent child health and safety incidents and better identify concerns:
  - Mandated reporting of child abuse and neglect
  - Positive strategies to support social and emotional development

## Policy Goal: Clarify who is responsible for following **safety practices**

- Everyone who **interacts with children\*** must follow safety practices
- This includes reporting child abuse and neglect to the appropriate state or tribal **child protection authority**

*\*this is a simplified summary: see preamble and regulation text for precise language*



# QUALITY IMPROVEMENT



## Policy Goal: Clarify what behaviors are inappropriate when interacting with children

- Aligns requirements for **Standards of Conduct** related to maltreatment and endangerment of children with four major categories of child maltreatment

### Behavior that is:

- Corporal punishment or physically abusive *hitting, kicking, shaking, restraining*
  - Sexually abusive *inappropriate touching, inappropriate filming*
  - Emotionally harmful or abusive *using seclusion, name calling, shaming*
  - Neglectful *leaving a child unattended on a bus, withholding food as punishment*
- Clarifies that violations of this part of the Standards of Conduct require an **incident report** to OHS



# QUALITY IMPROVEMENT



## Policy Goal: Clarify requirements for **reporting incidents** to OHS

- OHS incident reports required immediately **but no later than 7 calendar days** following the incident
- Clarifies which **significant incidents** affecting children's health and safety must be reported:
  - Occur in a **setting** where Head Start services are provided **AND**
  - Involve a staff, contractor, or volunteer **OR** a **child** that participates in program or classroom at least partially funded by Head Start
- At a minimum, **reportable incidents include**:
  - Maltreatment or endangerment of a child (as defined in the Standards of Conduct)
  - Serious harm or injury resulting from lack of preventative maintenance
  - Serious harm, injury, or endangerment resulting from lack of supervision
  - Any unauthorized release
- Management system must ensure **all staff are trained** to implement OHS incident reporting procedures





# QUALITY IMPROVEMENT



## Policy Goal: Clarify expectations for ratios in **family child care** settings

- Clarify ratio and provider qualification requirements in **family child care** settings
- Did not retain NPRM proposals for:
  - Lower ratios in Early Head Start for the youngest children served
  - 46 weeks for Early Head Start center-based duration



# QUALITY IMPROVEMENT



## Policy Goal: Streamline requirements around Quality Rating Improvement Systems (QRIS)

- Clarifies that programs **should participate** in their state or local QRIS, to extent practicable
  - Participation should not duplicate existing documentation requirements
  - Tribal programs remain exempt
- The previous standard was that programs “must participate” if three conditions were met



# QUALITY IMPROVEMENT



Policy Goal: Improve communication about Head Start programs

Formalize common practice definitions

- *Head Start* - entire birth-to-five Head Start program
- *Head Start Preschool (HSP)* - children ages 3 to compulsory school age
- *Early Head Start (EHS)* – birth to age 3



# QUALITY IMPROVEMENT



Policy Goal: Improve **communication** about Head Start programs

Improve and modernize communication with families

- Include modern technologies in recruitment efforts and reduce burden on families
- Ensure user-friendly enrollment process
- Consider diverse language types and abilities in determining accessible forms of communication



# QUALITY IMPROVEMENT



## Policy Goal: Clarify definitions and requirements related to **facilities**

- Increase the threshold to **\$350,000** in the definition of major renovation
  - Alignment with simplified acquisition threshold
  - Flexibility for Tribal programs
- Clarify that if **federal funds for fees and costs** associated with facility application are approved, they are allowable regardless of the outcome of the application



# 60 DAY TIMELINE



## Highlights of policies that have a compliance date of **October 21<sup>st</sup>, 2024**

- **ERSEA Changes:** *such as*
  - Housing adjustment
  - Definition of income
  - Modernizing communication
  - 10% of children with disabilities
- **Mental Health:** *such as*
  - Mental health consultant qualifications
  - Suspension
- **Lead**
- **Newborn visit content**
- **Child Health & Safety:** *all changes including*
  - Proactive approach
  - Standards of Conduct
  - Incident Reporting
- **QRIS**
- **Facilities**
- **FCC Ratio Clarification**
- **Workforce Polices:** *such as*
  - Culture of wellness and employee engagement
  - Professional Development plans



# 3 MONTH TO 1 YEAR TIMELINE



## Highlights of policies that have the following compliance dates:

### December 19<sup>th</sup>, 2024

- **Services for Pregnant Women:** *specifically*
  - Tracking and reporting services provided

### February 18<sup>th</sup>, 2025

- **Services for Pregnant Women:** *specifically*
  - Promoting healthy birth outcomes

### August 1<sup>st</sup>, 2025

- **Mental Health:** *multidisciplinary approach changes, including*
  - Monthly frequency for mental health consultation
  - Annual review of mental health consultation services
  - Screening for social and emotional development
- **Community Assessment**
- **Barriers to Enrollment & Attendance**
- **Qualifications for all FCC Providers**



# 3 TO 7 YEAR TIMELINE

## Highlights of policies that have the following compliance dates:

### August 1<sup>st</sup>, 2027

- **Family Assignment Maximum** *for Family Partnership Services*
  - 40:1 family to staff ratio
- **Workforce: Wellness**
  - Adequate breaks

### August 1<sup>st</sup>, 2028

- **Workforce: Benefits** *all changes, including*
  - Connecting with health insurance
  - Paid leave
  - Short-term behavioral health supports

### August 1<sup>st</sup>, 2031

- **Workforce: Wages:** *all changes, including*
  - Salary scale
  - Pay parity
  - Minimum pay



# WHERE DO YOU START?



## Step 1:

- Reflect on your current model
- Many programs already meet a lot of the new requirements

## Step 2:

- Identify new requirements that have an early compliance timeline
- OR*
- That will need time to plan and make incremental change



# A GUIDE TO POLICY LINGO



**Effective Date:** when the new standards officially become part of the government record

- *It means:* the new standards are official and you are **allowed** to do anything they allow
- *It doesn't mean:* you must do everything by the effective date

**Compliance Date:** when programs can legally be held responsible for the new standard

- *It means:* OHS has the **option** to conduct oversight on a standard once the compliance date has passed
- *It doesn't mean:* OHS will definitely monitor on a standard as soon as the compliance date passes



# NURTURING THE PROMISE



Look out for resources and events with the Nurturing the Promise logo

- The logo means the information will help programs as they implement the new standards

We want to hear from you!

- Tell your Program Specialist how OHS can support you in this process
- Stay tuned for more opportunities to engage with OHS



# NURTURING THE PROMISE



## Next Up from Nurturing the Promise

- Videos from Director Garvin about the new standards
- Resources explaining the workforce policies in more detail

## Monthly Headline Topics

- October's headline will be Child Health & Safety
- Stay tuned for topics for upcoming months!



# NURTURING THE PROMISE



## ECLKC Resources

- HSPPS with tracked changes
- Final Rule Preamble
- Fact sheet covering the major changes
- Timeline with Compliance Dates
- Recordings from webinars

*And more to come!*

