

## Office of Head Start CAMP: Session 2

Ann Linehan: Good afternoon and good morning. This is Ann Linehan from the Office of Head Start. I am starting us off today because our fearless leader, Dr. Bergeron, is on a well-deserved vacation. And I have the pleasure of working with three of my colleagues that are pretty much household names: Colleen Rathgeb, Adia Brown, and Belinda Rinker, and we hope today to provide you with some great information and calm your nerves about this coming program here. Again, I just want revisit – this is our second session – and revisit the purpose of really what are the guiding principles, and it's really to empower grantees to make reasonable decisions. Again, explore how meeting the Head Start requirements may look different, reinforce grantees to use community data, and state data, and local guidance to make informed decisions, and of course, first and foremost, the health and safety of children and families comes first. And in today's session, we're going to take a look at Program Governance, Subpart I - Human Resources Management, timelines in the Head Start Performance Standards, and we are going to also talk about wages. Adia?

Adia Brown: Hey Ann, I'm so happy to be here, and I'm going to be your moderator for asking a lot of questions today. And so, one of our very first questions that we have about wages are: Do programs need to provide information reports and training to their governing bodies during the COVID-19 pandemic?

Ann: Well Adia, that's a big yes. And I think what – what we absolutely understand. Not only is it a requirement to keep your governing bodies informed; this particular time period, it is critical you and the administrators are making decisions all the time about program changes and designs, and keeping the board and the governing body informed is absolutely critical. Also, it's important: training of the board members. We know that programs, they're doing lots of things in creative ways. Training for board members is really important, especially as new board members come on, and we know that that can happen virtually. Again, as we navigate through this pandemic, communication with the governing body is absolutely critical.

Adia: I think a next question that is – is a good follow on is: Are there any changes and expectations for policy council?

Ann: Absolutely not. I mean, the policy council plays an incredibly important role. We have already seen this year how creative programs have gone. And what we're hearing from many programs is this – policy councils are actually more engaged through virtual meetings. So again, the policy council are great communicators with other parents, so it is really important to keep them involved.

Adia: You know, Ann, I just heard you mentioned something about virtual meetings, and our next question is really about: Are programs able to host virtual board meetings or parent committees or policy commit – committees, and are digital signatures acceptable?

Ann: Well, two big guesses really. Again, the creative solutions that programs that we are seeing all across the country. And we know that it's going to be a really important part of successful recovery efforts, you know, to keep our board parent committees and policy committees engaged, and absolutely, digital signatures and electronic records are recognized as equivalent of an official paper file.

Adia: All right. So it sounds like, Ann, you're saying a lot of what we normally would see boards and policy councils do, we would want them to continue to do those things?

Ann: Absolutely, and I think we're learning new, and in some ways, more effective ways to do business.

Adia: Well, the next thing that folks had a lot of questions about was human resources. So policy council was first up; the human resources: there were a lot of questions from the grantees about that. So the first question is really about fingerprints and background checks. So folks wanted to know: If state or local fingerprinting offices have been closed – and definitely due to COVID-19 – do grantees still need to comply with the background check requirements?

Colleen Rathgeb: Hi, everybody. This is Colleen – Colleen Rathgeb. Happy to be with everybody again this week. To get to answer some more questions and to hear more questions from the field. So yes, we have heard questions around the folks concerned about the ability to meet the background check requirements with many local and state fingerprinting offices being closed. And so I want to remind folks of a couple of things: First, is that, at a minimum, all grantees still have to comply with the background check requirements that are in the current Head Start – in the Head Start Act, and it has been in place since 2007. And so those – as folks remember – that background check that has to be done before any individual is hired. That can be done with a name-based check that can often be completed online. And so, even if fingerprinting offices are closed, programs still need to be able to do that name-based check that, you know, that's allowable under the requirements in the Head Start Act – that still has to be done before anybody is hired. As folks know, the more comprehensive background check requirements were put in place with the revision of the performance standards, but those don't go into effect for all Head Start programs until September of 2021. So, a little bit over a year from now. So, for right now, programs need to focus on complying with the requirements that have been in place since 2007 in the Act. However, we also understand that many – many programs already have to meet these more comprehensive requirements that will apply to all Head Start programs starting in 2021, but many programs have to meet similar requirements now because they have to follow their state licensing requirements, and those state licensing requirements are the more comprehensive background checks that will be coming into play for all Head Start programs soon, but – but we know that many programs need to meet those right now. So we encourage you to – to talk to folks in your state, to look at what, if any, flexibilities your state licensing is giving on those requirements. We do know that the – the federal Office of Child Care has approved waivers on – on some of the different components of those comprehensive background check requirements for almost half of the states and territories. And so, there is a – there is flexibility in many states, so we really encourage you to make sure you know what is

possible there so that you can see it again. In many of those cases, they are allowing these name-based checks, similar to what is allowed under the Head Start Act requirement, as long as you do that name-based check and also check the National Sex Offender website. So again, you know, we know that – that states vary, but we encourage you to look at that as there is also a lot of flexibility coming from the Office of Child Care during these particularly difficult times.

Adia: Well Colleen, that was – that's a comprehensive answer. So I'm sure that people out there will – yeah, it really was – I'm sure people out there really have it nailed down. But you know, we have a lot of texts on the slides, and there's lots of questions from our participants as to whether or not these slides will be available. And the answer is yes, these slides will be available on ECLKC after the presentation. So, if you have your cell phone out and you're taking pictures of the screen, or you're trying to screenshot every one of them, you don't have to. These slides will be available for you. Let's go to the next question. So the next question is for Colleen again. So Colleen, are you ready for this one? Folks really want to know: Are programs expected to continue to meet the coaching requirements? That's an interesting question.

Colleen: So I'll first say, as Adia noted, that these slides have a lot of text. This is – could be like an example of how not to do a PowerPoint that is easy for people to, you know, to quickly look at – look at those, but it is exactly on pur – you know, the purpose like Adia said – we want folks to have access to these slides to be able to not just have to absorb this when we're talking right now, but be able to go back to these slides. So we very purposely made these very text heavy, like they are. So ... But to the question about the coaching requirements. Yes, we absolutely think that this is a really important requirement, that we – we don't want to back away from some of these really important requirements that we think people can accomplish, even if it will look different right now. So the basic – the basic answer is yes, that programs must continue to meet the intensive coaching requirements that are in – in the standards, which just to remind folks, require that programs identify staff that need intensive coaching. So again, not – not necessarily for all staff, but that programs have a process to identify staff that need the intensive coaching and then implement these intention – intensive. coaching requirements for those staff. We know the way you do that, this year, may look at when – they need to modify the way you do that as you're modifying the programs, options, and the schedules, and how you're delivering your services. So we think that as programs are continuing to provide center-based and home-based and family child care services, they should consider how they can continue those coaching – coaching those staff, while they also are limiting the exposure to other adults or other children coming into contact with each other in order to reduce the risk of spreading COVID. So we think there may be other ways to provide this coaching; folks should be looking into ways to do the coaching virtually, either with individuals or remotely groups of staff. We also think programs may consider or be considering looking at how they do observations when they're doing virtual education services. So, if they're doing a lot of work virtually right now, are they having opportunities for coaches to – to observe how those virtual class sessions are going and to be able to give feedback to teachers on those sessions. Also, really want to make sure that folks are aware of all of the resources that are available from OHS to help – to give strategies to do this programs on the ECLKC, they can have access to the Head Start Coaching Companion that is going to give you a lot of assistance. They can ... to be used in

– in coaching. There's also lots of different resources out there about practice-based coaching, about teaching and home visiting strategies. And so we really encourage right now ... we know that people have actually been accessing a lot of the resources and the web-based trainings right now as folks are – had maybe have more – more time to be able to do some of that virtual training – those trainings. So we just really encourage that for people to keep – keep looking at those resources.

Adia: Colleen, I bet we're going to see a lot of innovation in this area as people think about how they're going to provide that intensive coaching.

Colleen: Absolutely.

Adia: So let's ... our next question is really about staff, and folks want to know: If staff are at increased risk for severe illness from COVID-19, how can programs prioritize their safety?

Colleen: I just want to start – and I think Ann probably started with this at the beginning talking about kind of our overall principles with this series is – is we understand and know that this is going to be a really challenging time. And it's going to be a particularly challenging time for staff and – who have higher risk of serious illness themselves or have family members that are. And so we really know and encouraging programs to carefully consider how those staff can continue to fulfill their responsibilities if they're unable to return to an in-person work environment. So, are there other duties that are necessary that – work that needs to get done that might be able to be done in alternative ways? For example, if programs are going into next year and will be providing some in – in-person services and some virtual services could be assigned those staff to be doing the virtual home visits or education services. And – and really find ways where they can align the positions that they need to do the work with the strengths and the needs of the existing staff.

Adia: Colleen, I bet you a lot of people just pour themselves a little cup of hot chocolate added some marshmallows to it just ... you know, you're so relaxing. So, you know, I think after that folks are probably thinking, "Well, you know, here's another question about if programs are providing virtual services – because we just talked about virtual services – to enroll children and families, how can they continue to promote communication with families with limited English proficiency?" I'm going to put my marshmallow on the fire while you answer that one.

Colleen: Yeah, don't burn it. So I think one – it is another area Adia just mentioned like how much innovation we're expecting to see? And I – I think this is another area where we know that – that programs are figuring out how to do this, how to do this better than they maybe have before, and what resources are available and how they can share them and – and learn from each other. But I think it – it underscores how critical it is for programs to be able to communicate effectively with – with children that are dual language learners as we always really, you know, focus on as well as the families that have limited English proficiency, even more when so much of the education services we're looking at providing virtually really needs to – to be with that – those parents and the family to be able to deliver those services when they are home and to be able to extend that education. And so, we really think it's important

that if there are no staff members that speak the family's home language, that programs really figure out other ways that they can ensure effective communication with the families and their home language, and that could be through community partners, through consulting tents, using interpreters, virtual technology options. ... really to figure out ways that they can ensure that they can implement the – the, you know, have these communication plans that they've had to really meet the unique needs of each of the families, even more critically in the environment we're in right now.

Adia: I think programs – and I think programs have been doing a lot of work around it. It's just doing it in a different context. So our next question is – might make our participants feel like they have a pingpong ball, and that's part of camp, right? All the activities – so we talked earlier about coaching. This question is really about programs and whether or not they have to ensure that all staff receive the required 15 hours of professional development during the 2020-2021 program year. What do you think about that, Colleen?

Colleen: I'm going to think people are going to think my answer sounds an awful lot the same as, you know, as we did when we were talking about coaching, but we still – this is still an important requirement. And so, programs still need to be meeting at that – that 15 hours to support their staff with professional development opportunities. We still think that there's – programs are going to need to adapt the way they're delivering that if they're, you know, they're used to doing a lot of that in-person, through in-services, through other trainings that are in person, they may be obviously needing to modify ways they can do that. They should be looking at how they modify both their individual PD plans as well as the programwide approaches. And again, want to point folks to the ECLKC, I know many programs do utilize the resources on there, but for folks that maybe are not as familiar, we really want to point you to all of the online learning modules that are on the ECLKC. Many of those modules – that folks don't know – staff can earn continuing education units, review their certificates of participation. There are individualized professional development portfolios are up there. The Early Educator Central, that's going to link folks to a lot of other trainings that are available to support the staff. So we really have – we have things are available to help, as we were talking before about how you can effectively communicate with dual-language learners' families. There's a lot of information and modules and support up there that programs can use as they ... maybe have to modify the way they – they get that 15 hours of professional development to their staff.

Adia: Well, after they get that professional development to their staff, Colleen, there may be a lot of programs who have lower numbers of staff, and how can they mitigate incidents of maltreatment or children being left unattended?

Colleen: This is something that obviously we're – we're really worried about – we're worried about this coming year, as programs know, but to really – to recognize this is going to be really challenging. You know, as programs and as centers open, they're going to be new health and safety procedures. There's going to be a lot of new things going on. As people said, there may have be – there may be some lower numbers of staff if they're making smaller groups. And so we really need to make sure that programs, when they're planning for this year, they really plan

about how they will have the sufficient support to detect and mitigate any inappropriate child-teacher act – interactions that could result in maltreatment or a child being left alone. As programs know, these incidents often relate to insufficient support for staff, particularly staff that are overwhelmed or may have the, you know – not have the necessary skills to – to consistently implement positive strategies. And so we really want to make sure – in all of the planning programs are doing around next program year – that they really keep focused in the top of their mind about how they can ensure that staff are supported to mitigate and detect any – any problems around the inappropriate – inappropriate supervision of children.

Adia: Great, Colleen, and you know what? I only have one more question for you, and my last question is if a – can programs hire staff if they're not able to get the required health screenings for them?

Colleen: So programs absolutely have to have all of the required health screening for any new staff; that has to be completed before there's any in-person contact with children, families, and staff. But right now, since there may – going into next year – that there may be staff that are working entirely virtually, that is somewhere where you could allow a staff to begin working virtually while they are completing that required health screening as long as that seems like it's sensible, if that's something a program wants to be able to do, they have the flexibility to do that, but absolutely would have to have all of those health screenings completed before there was any in-person contact with children, families, or other staff.

Adia: Colleen, thanks so much for breezing through those questions for us. The next set of questions are going to talk about the Head Start Performance Standards timeline, and Ann's up. She's going to answer a lot of these for us. So Ann, let's start with the first one. Is OHS providing flexibility related to timelines, such as things like completing vision and hearing, or determining if pregnant women have access to healthcare, or determining whether or not children are up-to-date, or scheduling newborn visits? What are we doing about timelines?

Ann: So, Adia, I'm so glad that I have an opportunity to comment on this area, because I think it's one of the biggest stresses for programs. And even though we're going to take each one of these individually, overall, our response to this is: these are absolutely vitally important. I think the timelines that we have in the standard are there for purpose. We're talking about as early as we can for intervention or preventative services. But clearly, we understand that this year there are going to be some challenges. So, programs will not be penalized if they cannot make the timelines that we're going to go through specifically, but really it should not ... We don't want to signal that programs should let up on their efforts and their tenacity and determination to – to get these services, get these screenings done, ensure that there's a source of healthcare. These are incredibly important. So, nope, you don't have to worry about being penalized, but the importance – get as close to those timelines that you can get these things done. ... That's – that's what we want to leave you with it. And clearly documentation is going to be important so we are able to see the efforts that you have made to meet these requirements. Do you want me to read the next question Adia? Maybe letting me off the hook.

Adia: I'm sorry, I was on mute, but I'm back. I said, "Let's go a little deeper Ann." So ... this is a question that's just about the 45 days. So what flexibilities are we providing around development screenings, vision, and hearing input for the 45-day requirement?

Ann: Well, again, I want to start out with saying how incredibly important it is we have a 45-day – you know – requirement. We know it's important what you identified, then you can begin referral. And, you know, we also have to keep in mind when we take a look at these timelines and saying folks won't be penalized, we have – we have children, in some cases, who have been out of any structured setting for almost now six to seven months, who have been without, you know, the intense instructional support that they might've gotten before the COVID hit. So again, I think completing these as quickly as possible, so again, you can work the necessary referrals and services. Again, you're going to find a kind of a similar scene when we take each one of these individually. ... You know how important it is, but what we want to do is reduce that level of stress and anxiety you have about, "Oh, I haven't – we may not be in compliance if we don't do it by 45 days." Let's put that aside and just focus on the creative ways that you can get these screenings done.

Adia: Well, talking about reducing stress. How about the flexibilities around pregnant women and making sure they have access to healthcare in 30 days?

Ann: Well, and I think this is both for the child and the pregnant woman. I mean, we have that – obviously that requirement to make a determination within 30 days, and then do whatever you can to ensure that you're providing the support, either to the pregnant woman or to the family who has a child enrolled in Head Start. ... Just helping them get access to a source of healthcare. And it's, you know ... They're equally important. You got a pregnant woman, you want to make sure that she is accessing critical care for prenatal health needs, and for, you know, the – are the – the little kids from birth to five, certainly, having a stable source of healthcare is so critically important. So again, bringing – bringing – taking away the stressor "oh boy, if we can't meet it within 30 days." Set that aside and just focus on the creative strategies to support families and pregnant women to get this done ... as soon as possible.

Adia: Well, Ann, you might start sounding like a little bit of a broken record here, but there's another question, and it relates to the 90-day requirements. What should programs do with those?

Ann: Well, you know, this is so – again, this is so critical, and I – you know – people say I am a broken record. But again, ensuring kids are up to date. We know that a lot of children may not have had their well- baby checked over this period, and they may not be up to date. And again, we know how effective Head Start programs are in supporting families in getting their kids up to date. I think it's even ... You know, while we're saying if you can't – if you cannot make the 90 day timeline, we understand that, and yet there's this kind of – you know – tension on the other side saying "it may be more important even than last year or the year before" to ensure that – that kids are getting up to date. So, again, it's – it's a very similar thing to do; how important it is for trying to remove the stress.

Adia: And Ann, there seems to be one more, and this – this goes back to pregnant women. This is about newborns. So, are we providing flexibility for that two-week visit?

Ann: You know, we are. And I think this is going to depend on, you know, what is the mother's comfort level with someone coming into the home with – with – with the importance of social distancing. And you know, maybe – maybe the home visitor doesn't come into the home, but there are going to be other ways to support the mother and her newborn infant. Again, the importance of developing and strengthening that relationship, you know, within the two weeks of– of mum being home; we know how important it is, but we know that there may be different ways of doing it, and we know it may not happen quite within the first two weeks. And again, re – obviously not only the comfort level, but also being sensitive to the cultural preferences of – of the family.

Adia: So Ann, we talked a lot about the flexibilities as it related to pregnant women and health – and health and – and children's screenings and things like that. Will OHS allow flexibilities for other timelines in the Head Start performance standards?

Ann: Well, not everything needs flexibility, and we have on ECLKC – you can see the link there – you can click on that, and you can review all of Head Start program performance timelines, and below it just a couple of examples. This is not all inclusive. Just a couple of examples of "these things don't need flexibility." You know, all staff required orientation training within three months of hire, whether or not that's done in person or virtually: absolutely important to do. And we see this as: there are no barriers to this getting done. I think the other thing is teachers hold parent conferences as needed, but no less than two times per year. We know communication with parents is going to be absolutely paramount, and we think for teachers to be able to hold parent conferences again – it may not be in person – absolutely critical.

Adia: Okay. Well Ann, it's always good having you answer the questions. Just always so clear and – and folks love to hear from you. We're gonna go to another topic and it's wages. And I have my friend, Belinda, and Belinda is gonna answer a lot of questions that people have related to wages. So Belinda, are programs expected to continue to pay staff and pay wages and benefits to staff whose work is not needed to deliver your program services?

Belinda Rinker: Thank – thank you, Adia, for that question. And this is Belinda Rinker again. It's my pleasure to be able to join these important CAMP conversations. And I think Adia has just shared a really difficult and timely question with me that I want to spend a little time working through. Initially, when COVID-19 descended on the Head Start community and programs started to close, we felt it was important for the stability of the future for continued payment of wages and benefits for staff who were unable to report to their designated center. And there were a couple of reasons for that. The first being that if remote services were to be initiated and continued, staff would need to be available to deliver those services. And in the event that centers began to reopen or home visiting resumed, we wanted to make sure that staff were available to engage in those activities. But we understand that we are in a different place now, and programs are beginning to look at what the next year of services will look like in their communities. And we are seeing a wide variety of approaches. All that innovation we see in the



Head Start community, some programs are staying mostly with remote service delivery, some are feeling they're able to shift back to a more center based or in Early Head Start, possibly home visiting situation. Some are looking at combinations of the two. But we also note that there will be a point as those decisions are made by the program about what their services look like going forward, that they will need to step back and take a careful look at what staffing needs are associated with those program decisions and what the budgetary implications of those decisions are. So, many of you are aware that the Office of Head Start has continued the flexibility that programs have to continue to pay wages and benefits to staff who are unable to report due to center closures through September of this year. That does not mean that every person who previously worked in Head Start will necessarily continue to receive wages and benefits. So once those staffing needs for a program are determined, the expectation is that there will be some staff potentially delivering remote services, and I think Colleen talked about that would be a great place to slot higher risk staff into a situation where they were delivering remote services, and some staff will be returning to centers. But if the program has determined what the work needs are from a staff member and that staff member is unable or unwilling to accept that work assignment, grantees may – certainly subject to any applicable laws and regulations – make changes in that staff member status, including layoff or, eventually, termination. So we think these need to be very individualized decisions. It's going to require careful communication between programs and their individual staff members being mindful of, you know, the need to maintain confidentiality of certain kinds of information. In addition, as programs are making their decisions about individual staffing and the employment status of individual workers, they really need to look carefully at all of their applicable compliance requirements. And there are many of them, including grantees own leave policies, any collective bargaining agreements to which they're a party, any state employment and leave laws, including those that apply to separation from employment, the federal Family and Medical Leave Act, any state disability protections, as well as the Americans with Disabilities Act. And that is not an exhaustive list. So this is really one of those times where programs need to be very thoughtful, very careful in their communication, be mindful of both their budgets, their program needs, and the individual circumstances of staff, and work really closely with your human resources professionals, understand the benefits requirements, make sure your own policies and procedures are complied with, and potentially consult with legal professionals in making those important employment decisions. So that's a lot of information, I know, very meaty, but I wanted to make sure that programs are aware that we understand that there will be staffing decisions to make. We want them to be as responsive as possible to individual circumstances, but that at some point, changes may be necessary to assure that plan program services can be delivered by qualified staff.

Adia: So Belinda, this is around the time where I get all the campers to take a deep breath. So, if you're out there on the line, take a deep breath because this is – that was a very meaty answer, and there's a lot of information that your brain has the process right now. So that ... You take a deep breath, process the information, and know that you will receive these slides. So Belinda, we have another question that relates to wages. The next question is: Do programs have the budget flexibility to make adjustments to hire additional staff to assess – to assist with health, safety, and sanitation requirements?

Belinda: So, absolutely. Programs need to take steps that will change the way they operate in order to be responsive to COVID-19, and they can initiate those changes using their current base grant funds if the Cares Act funds have not been received yet, and then reimburse back to the base grant, or if programs have already received their Cares Act funding, they can certainly use them for these kinds of needs. So when there are specialized requirements around health, safety, sanitation, or even materials and supplies like protective equipment and things of that nature, grantees absolutely can use either their base grant funding or their Cares Act funding to address those needs. And there is some flexibility that was implemented in Information Memorandum 20-03, which is available on the Early Childhood Learning and Knowledge Center, that actually gives grantees even more flexibility if they need to move funds between budget categories to make those kinds of changes. The prior approval requirement for budget transfers between direct cost categories through December 31st of 2020 has been raised to 1 million dollars, so grantees have a great deal of budget flexibility. Certainly, any changes in the budget need to be documented because you are going to have to make your SF-425 report based on budget categories, so be sure you maintain a record of those changes, but grantees have significant flexibility. And I would just also highlight the other fiscal flexibility that might be helpful as programs gear up to resume center-based services is the ability to purchase equipment of up to \$25,000 if needed to respond to COVID-19 without prior approval, rather than the usual \$5,000 threshold. Adia?

Adia: Okay, Belinda, I'm still here. I'm with you. So, good answer. Here's one that's a little lighter, because those were really meaty answers and people needed to know 'em, but this is one that people – someone sent in, and it is whether or not staff can receive a stipend for the personal use of their cell phone. How about that?

Belinda: The general answer is yes, Adia. Subject to ... You know, this is always my mantra. Those of you who know me know that I constantly talk about the application of the cost principles to any financial decision. So, is it necessary? Is it reasonable? Is it allocable? Does it have a beneficial connection to Head Start, and is it adequately documented? So, we understand that if staff are using their own cell phones for Head Start use, they should be compensated for that. They should receive something in the nature of a payment or a stipend, or however, we want to label that. Now we understand that it may be difficult to allocate between normal personal use of a cell phone and additional program use, but any reasonable basis is acceptable for making that differentiation. So for example, if we assume a – reasonably assume that folks use their phones for 12 hours a day, and they're expected to be available to conduct work activities during eight hours of that day, since three fourths of the cost of that cell phone could be paid with Head Start or with Cares Act funds. It could also be based on minutes of use or something like that. We don't want to make this difficult. And if it's not possible to make that kind of calculation, certainly, then a reasonable amount of stipend could be paid to the grantee for them to apply towards the cost of their personal cell phone, as long as it's being used for Head Start purposes. And again, that use and that decision would need to be documented to demonstrate that it was a benefit to Head Start.

Adia: Alright, Belinda, that's a good answer, and I just have one more for you. And that is about hazard pay. So, can Cares Act funds be used to pay teaching staff hazard pay?

Belinda Rinker: So Adia, that's a – I think that's an important question. Certainly, it is possible to provide financial incentives to staff. That financial incentive has to be related to a benefit to the Head Start program. And so, you know, if the – the identified benefit is a need to have adequate staffing within classrooms as they reopened, and the program wants to provide a financial incentive or financial reward, or I've heard it referred to – as you did earlier – as hazard pay. Then the program needs to develop policies and procedures that would establish the circumstances under which the financial incentive, which we can call hazard pay, would be provided. So, who is eligible to receive it? What are the circumstances under which it would be paid? How much would be paid? How can you demonstrate that that amount is reasonable? And then, how long will those payments be made available? So all of that information about why this additional incentive is necessary to benefit the Head Start program, and then an underlying policy or procedure, which is HR or fiscal policy or procedure, needs to be approved by the governing body and the policy council that would identify again, "Who is eligible, what are the circumstances, and how are these payments going to be made?" And just remember, there is a requirement in the uniform guidance, the fiscal regulations, the ones that – 45 CFR part 75, and the particular regulations that deals with incentive payments is 45 CFR 75.431. So that's – that's the one about incentive. So the answer is, as often the case with fiscal questions, that if you can determine that the expenditure is a benefit to the Head Start program, if it is supported by policies and procedures, if it meets those cost principal requirements of necessary, reasonable, and allocable, and if it is adequately documented, it is going to be allowable. But the establishment of those – those foundational criteria, it's really up to the program.

Adia: Well, Belinda, I bet you so many people got lots of help from those answers. Thank you so much for providing them. And now, we're going to do something at CAMP. It's going to be really exciting for our participants. I hope ... We're going to do a speed round of answering some questions. We have some questions that you guys have been putting in the boxes below. So you've been asking lots of questions, and I hope that doesn't mean that you weren't listening. That you were listening and typing in those questions, but I – we're also going to answer some of the questions that we got from you guys last week. So, I'm going to start with some of the questions that you asked last week. The first thing I have to do is give you a little bit of a reminder. So some reminders from last week, a lot of the flexibilities extend through the 2020 and 2021 program year, so you want to make sure to remember that when you're thinking about how you're going to go forward. Also, there's a ...

Ann: And Adia, may I just ... Adia?

Adia: Oh, sure!

Ann: Might I just add that those flexibilities is what we're talking about related to the program standards.

Adia: That's right. That's right. Another thing that you guys want to – might want to remember is that you should visit MyPeers, and MyPeers, there's a lot of opportunities to share and learn creative solutions from other grantees. And we think that everybody should be using that platform so that you can find out what your neighbor or people even far away might be doing during this time. And the third thing that we want to remind you of is using the ECLKC, lots of information is there. These questions and answers will be posted there, the PowerPoint presentations, so you can get a lot of information from that platform. So I'm going to throw out my first question to Ann. Ann, will the 10% children disabilities requirement be based on a program's total funded enrollment, or the reduced funded enrollment level programs are able to serve during COVID-19?

Ann: I'm going to punt to Colleen.

Colleen: Sure. So the – the 10% disability waiver is for the children that are actually enrolled. So it is not 10% of your, you know, your total funded enrollment if you're not actually serving those children. So in this case, if you were operating at a reduced enrollment level, it would be 10%, you know, of that reduced levels. So, always think about it just as it's 10% you're actually serving.

Adia: Alright, sticking with ... OK, sticking with 10%. Let's talk about the over-income at 10%. Is that 10% based on the number of children that the program is serving or the number of children that are enrolled?

Colleen: Gonna make it really easy cause it's the same as the disability question. It is, again, that programs have the ability to serve 10% of the children they've actually enrolled. So their actual participants being above income. So again, if you're normally, you know, if you're funded capacity is a thousand kids, but you're only serving 700 this year, you would be able to serve kids that are above income, not a hundred. So, it is the 10% of the actual enrolled children that you're serving.

Adia: All right. How about attendance? People are asking whether or not they should count each day that a child interacts with them or each day the program offers services? Which one would they count as attendance?

Colleen: For attendance, we really think of it conceptually the same way as you would be thinking about it if you were operating normally, so each day that a child actually receives services. So, you know, if it's virtual, if it's home-based, it's this idea of anytime that that child receives a virtual visit, the family receives a virtual home visit. There's a, you know, a virtual education session that goes on, so that's really what we think about the attendances, again, is when a child actually receives, or family receives, a service.

Adia: All right. Well, you kinda alluded to this a little bit. How about Home-based? Should they still be tracking attendance or home-based children?

Colleen: Yes, they should. We really think it's important that programs are tracking this attendance. And more importantly than anything, to be able to evaluate how it's going, to be able to determine are these services effective, you know, how much are we really reaching children? So we – we want folks to do it. You know, we all – we obviously have requirements around, you know, programs tracking attendance, and we – cause we – cause we think that's important, and we think it's important to make sure kids are getting services. And again, program's feedback, you know, let them have – look and see how effective the services that they're offering are based on our – our families using those services.

Adia: All right. And are programs required to collect signatures from families when completing enrollment paperwork?

Colleen: So, this is a favorite question. So this came up ... As Adia said, we wanted to look back and see from last week's CAMP session were there questions that kept coming up. And so, obviously a lot of folks have the question. And so, there is not a federal requirement that families have to sign the eligibility – your eligibility paperwork in general. So, there is a requirement that there's a staff signature that goes along with the verification to determine how the – it was – it was – how they determined that a family was – was eligible. There's only two cases where a family signature is required in the federal requirements, and those are when the family is self-declaring that they don't have income, so if there's no other way for programs to verify the income, or again, if there's no way to verify that a family is homeless, if the family is self-declaring that they're homeless, those are the only two cases where the signatures required. So, if programs generally have a requirement around [Inaudible] signature from the family, that is what they have chosen to put in place. And so, from – from our standpoint that – there isn't any flex – federal flexibility needed on that. And in the cases even with the – with the declarations, if programs are unable to get that right now because they're doing virtual eligibility determinations, they should document how they determined again – document the process they went through with the family, and then get that signature as soon as it is feasible from that family, even if it's not possible right at that moment.

Adia: All right, I'm going to do a very speedy question for you. I'm going to ask you a – some different types of – of income, and I want you to tell me yes or no whether or not they should be used in determining the family's income. You ready, Colleen?

Colleen: OK

Adia: You ready? Should programs count Cares Act stimulus towards determining eligibility?

Colleen: No, the Cares Act stimulus does not count towards income.

Adia: All right. How about the extra \$600 that folks got for unemployment?

Colleen: That also does not count towards income.

Adia: How about return-to-work stipends?

Colleen: If programs are getting some ... If it's, you know, if families are getting some kind of a return to work stipend – something like that – that is income that needs to be counted.

Adia: And how about hazard pay?

Colleen: Same thing. That is, again, that we have no special authority to exempt any types of income except for those first two that you asked about, the Cares Act stimulus and the extra unemployment. Those are the only two we have that special authority to waive.

Adia: If I had one of those audience clappers, I would give you a yay! You did a great job in that speed round, Colleen. The next area that we had questions from last week are program structure. Do I have somebody up to answer those questions? Is that Colleen or someone else?

Ann: Yep, Ann.

Adia: All right. Ann, you ready?

Ann: You making me nervous, but go ahead.

Adia: All right. Well, here we go. If programs are facing conflicting advice from other funding streams, how should they determine the correct path?

Ann: Well, you know, I think this is an interesting question, and I want to broaden it a little bit because I think this is why we need strong management systems and strong board governing bodies communication, because I think programs are going to be faced with a lot of conflicting information, just not on funding streams, but in other areas. And again, what we have said from the onset, is you gotta do what's in the best interest of the children and families and, and considerations of staff and obviously healthy safety: top priority. The one caveat I did want to add was, just as is normal, if there's a requirement from the Head Start standards or licensing, the more stringent applies for those programs that are licensed.

Adia: Good job, Ann. Can the grantees make decisions to reduce class size based on local data?

Ann: Yes, yes, yes, yes.

Adia: Good. How can programs reduce class size, alternate days, double sessions, change part day to full day to decrease the number of children coming through a classroom?

Ann: I'm going to get your short answer, but there's a lot more to this. Again, it's a local decision. It's a local decision, program needs to determine what program design will work best for the children and families and staff. They've got to consider things like what – what kind of cleaning, sanitation, and health and safety practices I have to impose to ensure that whatever we are determining is the right design, really is meeting the needs of the children and families and doing whatever they can to mitigate any kind of spread of COVID.

Adia: Good job. If – if a classroom size is smaller, is it possible for the second step to be absent for a brief period of time without introducing a floater?

Ann: You know, we absolutely understand folk's reluctance to introduce additional adults into the classroom. And so, we understand that concern. I think that this is – happens, I think, when you have two staff in a classroom, which is a requirement, there are occasions when one staff has to run to the bathroom, so I think people need to use their best judgment. One, want to ensure the safety, but we know even, even pre COVID, there were situations when one person had to step out for a very, very brief period.

Adia: OK, Ann. If a teacher gets sick and has to leave midday, would we be able to continue the day without a sub or a second adult, or need someone to immediately step in?

Ann: Well, you know Adia, I would ask what did you do pre COVID? Because this certainly happened prior to the pandemic. And again, we understand programs want to limit the number of adults introduced into a classroom, but we think programs should consider having regular floaters or subs so classrooms remain safe. Again, that's not a requirement, but we think that's gotta be part of the planning. Someone talked about, you know, teachers needing to go out and – and take children from the parent's car because you're not having the parents come in the building now. And you know, you may want to think about using some of the COVID funds for people that are signed to do those kinds of things who are – who are there regularly every day, so you're not introducing a new person. It's one stable person.

Adia: All right, Ann, and one last question. Will duration requirements still go into effect in August of 2021?

Ann: Yes.

Adia: Yes. All right, you did a fantastic job on the speed round, Ann. If had one of those audience clapping things, I would give you one "Yay!" So we've come – we're coming up on the top of the hour, and there are always lots of questions from the grantees. And we will do another speed round in our next session of CAMP, we might do it a little longer. You guys did such a good job of doing that speed round, and we'll answer a lot of the questions that we got in today. So, if you are a camper out there and you're one of our participants, I'm expecting you to be back next week promptly for another CAMP session, with your marshmallows, and your hot chocolate, and something comfy to wear. So, I'm going to let Ann close us out.

Ann: And I just want to see the – I want to see the slide that shows us what we're doing next week, and that is not showing on my screen. So, someone able to share the topics that need covering next week?

Adia: There you go, Ann, right there.

Ann: It's not up there.

Adia: It should be, I just put it up.

Ann: That's OK. If you could take us through that, and I will just close this out then. You could just tell us what's coming up next week.

Adia: So, next week campers, we're going to be talking about education and child development, and we'll be doing family and community engagement. And of course, just like we did on this call, you will answer more of your questions.

Ann: And I don't think we have any breaking news for today. I guess the breaking news is we'll try to answer the questions that you asked today, as Adia said, next week. We hope that things are helpful to you, and we hope that you continue to stick with us through the series. We just so appreciate ... We know that – that folks are really thinking through many, many decisions on many levels. We know that the situation continues to change, almost on a daily basis, but we have the full confidence that – that you will keep the health and safety of the children, and families, and the staff in the forefront of all your decisions. Thank you for everything you do. We know that you're really doing the most important work, in – in the country today. So, thank you so much on behalf of all of Head Start and Dr. B, who will be back next week, Adia, thank you, Belinda, and Colleen, and ... Take care of folks, we'll see you next week.