

Top FAQs from the Enrollment Forward Series

Glenna Davis: Hello, and welcome, everyone, to Enrollment Forward, top FAQs from the Enrollment Forward series. It is now my pleasure to turn the floor over to Tala Hooban. Tala, the floor is yours.

Tala Hooban: Thank you so much. Good afternoon and good morning, everyone. My name is Tala Hooban. I'm the Acting Deputy Director for the Office of Head Start, and I'm so excited to be giving the opening remarks to this webinar today. I would like to welcome you, the Head Start community, to the fifth and final webinar in the Enrollment Forward series. This series was created to provide support and resources to all Head Start programs across the country as we keep focusing on returning to in-person comprehensive services.

The Office of Head Start is well aware of the challenges that the programs and communities have faced, many of which have been exacerbated by the pandemic, including families' hesitancy to return to in-person services, family incomes that have increased during the pandemic, programs operating in areas where there have been minimum wage increases that impact eligibility, and workforce shortages that affected not only the early childhood community but other industries as well. We've appreciated your thoughtful questions and comments throughout the Enrollment Forward series, and as a follow-up to that response from the Grant Recipient Strategies webinar, we will be sharing the video segments featuring those programs as they provide additional details related to the strategies they shared.

For today, we have compiled frequently asked questions from throughout the Enrollment Forward series, and we'll spend the next 90 minutes or so on those. Thank you for the team for all your hard work on this webinar series, and I will turn it over to Gretchen so we can get started. Thank you.

Gretchen Jurgens: Thanks, Tala. Joining us today from Office of Head Start are Tala Hooban, Acting Deputy Director; Shawna Pinckney, Director of Grants Division; Heather Wanderski, Director of the Program Operations Division; Adia Brown, Acting Director, the Division of Planning, Oversight and Policy; Lindsey Hutchison, Senior Policy Analyst; Kate Troy, Senior Program Specialist, and my name is Gretchen Jurgens, and I'll be your moderator for today.

Throughout today's webinar, as Tala mentioned, you'll hear FAQ that have been received from the Head Start community throughout the Enrollment Forward series. Office of Head Start leadership will respond with the most up-to-date information and engage with participants around flexibilities, ERSEA, program operations, monitoring, and workforce. We have lots of questions to get to, so let's get started.

Hi, Heather. I'd like to start with a few questions for you regarding availability of administrative and fiscal flexibilities. We heard the public health emergency declaration may be ending soon. Can you talk to us about what that means for programs?

Heather Wanderski: Sure, so initially declared on January 27th, excuse me, 2020, the public health emergency was most recently extended on January 16th of 2022 and will remain in effect for 90 days. This latest extension will expire this Saturday, April the 16th, but can be extended as we've seen in the past, and so typically the secretary will ... and what we've seen is

generally renew every 90-days period, or they have the opportunity to do that. But an interesting question: If this public health emergency ends, what does that mean for our programs? I'm not sure that a lot of people know, but there are a number of our current fiscal and administrative flexibilities that we have in place that are available through the public health emergency declaration. That means if the public health emergency ends, so do our flexibilities, and we would need to go back to our standard operating procedures.

But one thing I want to make note of is that regardless of whether the public health emergency continues or ends, the Interim Final Rule with Comment on mask and vaccine requirements remains in effect in our nonenjoined states and that the CDC recommendations on COVID-19 prevention also remain in effect.

Gretchen: Thanks, Heather. That's certainly some important dates for us to be mindful of. You mentioned current administrative and fiscal flexibilities that are tied to the public health emergency. Can you talk a little bit more about those?

Heather: Yeah, yeah, definitely. Let me elaborate further. The fiscal and administrative flexibilities that I was referencing in the last question can be found in a very specific Information Memorandum. It's titled, "Updated COVID-19 Fiscal and Administrative Flexibilities." It's our ACF-IM-HS, well, Head Start, 21-01. There are actually three provisions specifically tied to the public health emergency, and they include exemption of certain procurement requirements, extension of financial and other reporting as well as waivers and other flexibilities.

Gretchen, if we have just a minute, I want to talk through some of these points, so if you can move just a little bit further on ... There we go. As I just mentioned, there are three flexibilities that are applicable throughout the duration of the public health emergency. Within the Information Memorandum, we state, "As appropriate, the Office of Head Start will waive certain procurement requirements related to geographical preferences," so recipients must maintain appropriate records and documentation to support any charges against a federal award. That's the first one.

The next, we say, "Recipients may request to delay submission of financial, performance and other reports up to three months beyond normal due dates. Recipients may continue to draw down federal funds without the timely submission of these reports but that these reports must be submitted at the end of the extension period. In addition, recipients need to continue to submit open/closed center status reports as well as enrollment information without postponement," so there's no delay on those reports. The third and the final is around waivers and other flexibility, so there are actually three embedded in this flexibility.

The first is on governing body approval, so at a minimum, we say that you need to have at least a statement that is submitted confirming that the governing body and the policy council members that were available for contact have given their approval of whether it be a continuation application or a post award amendment. Those applications ... There's a flexibility around those approvals. The second is around nonfederal match waivers. Right now, there is a flexibility that if you are looking for new funding – whether it be through a continuation application, whether it be through a supplemental application or even a carryover – that in order to request a nonfederal match waiver, you can simply place \$0 on your 424A within the

application, and that will essentially constitute a request for a waiver and that no further justification is needed.

Now, typically, we would expect a full justification that aligns specifically with the Head Start Act requires an explanation of why you cannot meet the match requirement and how you intend to meet in the future as well as board and policy council approval. Clearly, we have really laxed our requirements around the nonfederal match waivers.

Then, the third under this provision is around our administrative cost waivers, so if at any time within a given project period, if you estimate your development and administrative costs would exceed 15% of the total approved cost, you can submit a waiver request for the requirement, and they can be submitted through a budget revision. That's really the basics of the provisions that are specifically tied to the public health emergency, but there's one more thing that I want to make mention of before we continue on with the Q&A. Gretchen, can we talk about the prior approval waiver requirements?

Gretchen: Absolutely.

Heather: OK, perfect. This particular Information Memorandum that I just referenced may be at the top of your mind because the Office of Head Start recently sent out some communication regarding one of the provisions, so that communication was sent out as an e-blast on March the 29th, and it was about the prior approval waiver requirement. We are actually in the process of correcting the Information Memorandum and fiscal flexibilities as it relates to the prior approval waiver requirements. Those include prior approval for the purchase of equipment. Recipients can purchase equipment needed to respond to COVID-19 with a value of up to \$25,000 without prior approval, budget modifications which would allow recipients more flexibility to spend funds to respond to COVID-19, so prior approval is waived for budget transfers between direct costs categories for an aggregate amount not to exceed \$1 million and again specific to responding to COVID-19. Then the last one is around procurement by noncompetitive proposals to allow recipients to engage in sole-source purchasing to obtain goods and services needed for COVID-19 response and recovery.

In the Information Memorandum, it states that these waivers end on December 21st, 2021. However, we have communicated that they will continue to remain in effect until the OMB memorandum M-21-20. That's the memorandum that grants us our authority to allow these waivers. These would stay in effect until that memorandum either expires or is rescinded, and just so folks are aware, we are hoping to get that Information Memorandum corrected and available soon.

Gretchen: Thanks, Heather. Just a few more questions regarding the flexibilities. Let's say an application is submitted prior to the expiration of the public health emergency, and that application takes advantage of the nonfederal match flexibility, but the application is still pending with the Office of Head Start. Will that program have to go back and write a full justification for the nonfederal match waiver?

Heather: Great question, and I'm going to say no, absolutely not. The last thing we want is for grant recipients who, in good faith, submitted an application when the flexibilities were in place to have to go back and revise their application just because the flexibilities expired before our

office has had a chance to respond to the request. Just to clarify, applications or amendments that were submitted in accordance with active flexibilities will not be required to make flexibility-related revisions if the public health emergency ends. Your Regional Office is going to review, analyze, and evaluate requests that are received but specifically making note that applications or amendments will not be returned simply to make flexibility-related adjustments. Now if there's other issues with the application, certainly those would be addressed, but it wouldn't be specifically for this particular purpose.

I also want to make note that if you're in the middle of writing an application that has not been submitted to our office yet and the flexibilities end, you are going to be required to revert back to our standard operating procedures before submitting that application, which as I mentioned before would include a full justification for the nonfederal match waiver as well as governing body approvals. It's going to be really, really important that you maintain ongoing communication with your Regional Office whenever you're considering making changes or revisions within your program as well as submitting any type of budget revisions to our office. Thanks, Gretchen.

Gretchen: Thanks, Heather. I think I just heard a collective sign of relief that programs don't have to go back and make flexibility-related revisions. What are ...

Heather: Actually, as you say that, Gretchen, I want to point out again that we do not know what the secretary is going to decide to do. There may be another extension, in which case it would get extended for another 90 days, and I think primarily the important part to note is and just be ... making sure that we communicate out that programs be aware that this is a possibility and just keeping everyone informed.

Gretchen: Thank you. Heather, what about a program that has unobligated funds as a result of staff vacancies? Is there anything that those programs can do with those funds?

Heather: Wow, these are really great questions. Yeah, programs do have the ability to make use of unobligated funds. However, any requests need to be in conformance with the HHS Grants Policy Statement, and I say that because it's really important for not only the government, but also our grant recipients to know and understand what that policy is.

Within the policy, it talks about and states that carryover of unobligated balances is limited to approved purposes and that recipients that have unobligated funds may request a carryover, but it's important to note that the funds must be used for that same intended purposes for which they were originally awarded. For example, a program cannot just take remaining personnel and use it for a bus if you haven't received prior approval for the purchase of the bus, so you have to first get approval to buy the bus through a budget revision in the current budget period before the request to carry the funds over to a subsequent budget period. Again, thinking about the intended purpose, if it was awarded for personnel and you want to buy equipment, you have to ask for a budget revision to repurpose it for equipment purposes before you can submit a carryover.

Just want to also point out that we do really encourage recipients to generate expenditure reports during the budget period, stay abreast of any savings and then start thinking about and planning accordingly. Just as a reminder, budget revisions as I pointed out in that one example,

some may require prior approval and in which case you're going to need to make sure that you give your Regional Office sufficient time to review and approve before that period is over. Great questions.

Gretchen: That was another great example that you shared about purchasing a bus that just highlighted the importance of ongoing communication between program and fiscal staff. Just one more question related to COVID funding before we move on to some questions related to program operations. Can COVID funds be used for facilities?

Heather: Yes, yes, absolutely, COVID funds can be used for facilities, but I also want to just take a minute to clarify that the CARES Act and the CRRSA funds ... Those specific awards were made with very limiting language. Funds have to be used to prevent, prepare for, and respond to activities related to coronavirus, so as long as you can tie the facility activities to your COVID response, then it shouldn't be an issue for you to use that funding for facility-related purposes and activities.

Now, there was a little bit of a change with the American Rescue Plan funds, those ARP funds. They don't have the same limitations and can be applied to all activities that you would typically carry out under the Head Start Act. I also want to say that facilities are a rather vague description and could cover many different things, but if you wanted to use funds specifically for the purpose, construction or major renovation of a facility, the requirements of 45 CFR 1303.44 may also apply which would require a separate 1303 facilities application.

At a minimum, if the project was not included – like if there was a purchase, construction or major renovation planned – and you hadn't planned it at the time that we made the award for those funds, you're going to need to submit a budget revision, and that's necessary to adjust your funding levels to the appropriate object class category such as construction or, in the case of some modular units, to the equipment object class category. Otherwise, recipients really are strongly encouraged to engage in conversations with your Regional Office early in the project planning to discuss the process, to understand the program impacts and any other considerations that may pertain to the request, particularly if they can help you sort out if you need a budget revision and whether or not anything else needs to occur.

The other thing I want to make note of is that you should also consult the definitions section, 1305 of the Head Start Performance Standards because it's there where we define things such as major renovations, minor renovations and repairs, and those definitions can assist you with determining whether the breadth and the scope of your planned project requires a separate 1303 facilities application.

Gretchen: Thank you, Heather, for those very clear explanations, clarifications, and some great examples. Moving on to all things program operations related, as programs continue to monitor ... your communities. If data indicates COVID-19 cases are increasing, can services be provided virtually?

Heather: Yes, programs can temporarily use virtual remote services in cases where a program is experiencing high COVID-19 transmission in their service area. I think it's really important to make note and relay our expectations that programs do need to have plans in place to allow for changes in community conditions and that these plans have to be established within your

existing policies and procedures. I think it's also important that programs regularly consult the CDC guidelines, your state and local health department guidance, as well as taking a look at your local school district decisions and taking that into consideration as you continue to provide full in-person comprehensive services.

I also want to point out that we understand that virtual or remote services, I think it's important to say that it can create instability and stress for children and families, and it can definitely be disruptive to children's opportunities for learning, for socialization, continuity and routine, those things that really are needed to help support child development. To that end, programs really need to be in communication with the Regional Office about any proposed short-term use of virtual or remote services in response to a surge or a high transmission of COVID in the community and that programs should be reassessing with their program specialist for any extensions of that provision for virtual or remote services beyond a two-week time period.

Gretchen: There is a follow-up to that. If parents are reluctant to enroll their child due to COVID-19, can programs provide services virtually until parents feel comfortable?

Heather: Tricky question, so let me first start off with saying that really, the priority is to enroll eligible children and families that are most in need of in-person comprehensive services. That slots cannot be held for families who have decided that they do not want their child to participate in in-person services. As we said before and I think in past webinars, we did have the ability at the beginning of the current program year to allow some temporary provision of virtual or remote services to families who may need more time to get acclimated and adjusted. But those were discontinued, and that program should not be providing virtual or remote services as an ongoing option.

Certainly, you can consider checking in with families regularly to assess their readiness to return, and if you have them on the wait list and you're checking in and at the time a family says, "OK, I'm ready to go. I'm ready to return," but there may not be a slot available that they should continue to remain on the wait list obviously and that you should be in communication to let them know that that's a viable thing or that potentially could happen. But if families really do continue as you check in within to express hesitancy for in-person services, you may want to explore alternative options or placements that best meet their needs. Ultimately, you're going to want to assist families in finding a program that best supports them if they also desire to continue in that virtual services or in that virtual space.

Gretchen: Heather, communication and relationships are two areas that we know the Head Start community has always excelled in, and this is just another opportunity for folks to put those skills to work.

Heather: Absolutely.

Gretchen: Let's switch our focus for just a minute. Thinking about disabilities and working with children with IEPs and IFSPs, can programs apply for a waiver for the requirement that 10% of slots be occupied by children eligible for services under IDEA?

Heather: Programs should make every effort to recruit and enroll children eligible for services under IDEA in order to meet the 10% requirement. If a program experiences a barrier in

meeting that enrollment requirement, you are required to submit a waiver request. There isn't an ability for us to waive that. The waiver request must be submitted to the Regional Office after the halfway point in the program year and after you've had a chance to really demonstrate that you've tried to meet the requirement, but if you get to the end of the program year and you find that you weren't successful even after working through all of the different barriers and components to meeting the requirement, you're going to want to submit your request no later than one month after the close of the program year, and really that timing would be determined by your program year beginning and end date. It's really based on your individual program but really making sure that you have been able to document and demonstrate all of your attempts throughout the year to recruit and enroll children that are eligible for services.

Gretchen: Great, thank you. Heather, throughout the Enrollment Forward series, we have frequently talked about questions that have come up regarding change in scope, and we've continued to receive requests for additional information, so just a couple of questions if you don't mind us focusing on change in scope for a few moments. If programs are struggling to reach and maintain full enrollment, should they submit an enrollment reduction or conversion?

Heather: This is so ... These questions are really, really important. I want to say that the decision to submit an enrollment reduction or conversion request should be based on the needs of the community served and what's happening within your community and not solely based on the fact that the program is under enrolled. You should be regularly updating your community assessment and using that data to make programmatic decisions. Now, depending on what that data yields, you may need to pursue a reduction or to address the challenges that have resulted in under enrollment in your program, and that information should be the driving factor to request an enrollment reduction or conversion and the basis for crafting such a request to the Office of Head Start. I think also decisions and want to make note that decisions really need to be based on actual changes in the community and not based on anticipated changes, so for example, you wouldn't want to submit a request to reduce enrollment based on an anticipated increase in preschool slots in the community. I've seen requests that say, "We think there may be more slots coming," but rather, you want to have actual data support the request so such as, "Oh, we have documented three consecutive annual increases in preschool slots in our community" and then explain what those increases have yielded and how that has impacted your community. That's based on actual information, so I think that's one of the important pieces there. Hopefully, I answered the question. I think it really should be ... It really needs to be based on your community assessment, and that should drive your decisions.

Gretchen: Heather, as programs might be thinking about submitting an enrollment reduction or conversion request, can you talk a little bit about some of the most common reasons or justifications that programs have identified in submitting that change in scope request?

Heather: That's a really great question because I think there are many programs out there thinking about and wondering whether their ideas fall in line with what we are seeing generally in change in scope requests. I want to say here that, and I'll talk through all the different pieces, but what you'll see here is not in I think follow-up to that last question is not because a program is under enrolled, but there are very valid reasons that we would consider. You'll see

here for in looking at the various different types of change in scope requests, so for enrollment reductions, some of the common reasons that we've seen is for increases in staff compensation, so thinking about recruitment of new staff and retention of current staff.

Also, we've seen increases to respond to changes in the community wages, and those are usually by state, and it's not just to address the minimum wage increases. For instance, some states are moving to \$15 an hour but also to address wage compression as a result of the lower end adjustments that have happened to the pay scale. Programs may need to come into compliance with the \$15 an hour but may need to make other adjustments within their salary scale in order to address that wage compression.

Also, there could be a lack of viable classroom space, so I think in some instances, you may see programs needing to shift and serve primarily 3-year-old children in preschool classrooms which requires maybe serving a smaller number in each class, and so if there's no space to add additional classrooms, many programs need to resort to an enrollment reduction in order to support the new design change, which is less children in each of the classrooms.

Couple of things here with conversion, and I think they kind of go hand in hand, so a lot of times, our conversion requests, you'll see it's really about, again, community need for infant and toddler services, and so that we know is certainly a big need out there and just documenting that, or programs will ask for support in that. Also, proliferation of preschool services in the community, I think again hand in hand, so if we're seeing that in preschool services, does it make sense then to look at and focus on infants and toddlers?

Then with the locally designed option waivers ... so couple of things to point out here, some more common reasons or things that we've been seeing is the mixed service delivery that better meets the needs of families, so for instance, we'll see center-based services during the school year, and then also they may be providing some alternate services in the summer such as home-based services. But I want to clearly point out that that doesn't include programs that were designed to meet the needs of young parents enrolled in school settings. In those instances, there is a provision in the program performance standards that does allow programs to design and address those needs without the need for a locally designed option waiver. But if the program is designing that not specifically to address the needs of young parents but more just based on the needs of the community, then in those cases, you would need to come in for a locally designed option waiver. As well, excuse me ...

We have seen requests come in to also increase group size specifically to serve more toddlers, so in looking at the 24-to-36-months group, we have seen a request come in for locally designed option waivers to serve increased class sizes for those older toddlers.

Gretchen: The recurring theme I keep hearing, Heather, is community assessment data.

Heather: Yes, you got it.

Gretchen: One last question regarding change in scope, if a program is interested in submitting a change in scope request to address changing community needs, when does that request need to be submitted to ensure the recipient of a response prior to the start of the upcoming program year?

Heather: Another good question, and I would say that the timing is really critical for these types of requests. A change in scope really honestly can be submitted at any time, either whether it's within your continuation application or as an amendment, so really programs should look to or identify the implementation date and then work backwards to determine a time frame in which the application should be submitted.

Considerations should be given to an implementation date that really would cause the least amount of disruption to service delivery for children and families, so thinking about the more logical periods like at the start of a program year or during a winter break when there may be more transitions occurring and you have the ability to make those changes. Take, for example, a program that's planning to implement a change in scope request at the beginning of the next school year. You would be thinking about or if you're thinking about making that change let's say August, September, you really need to be considering submission of that request in early spring – so about now.

I do want to make note that you really should be engaging in ongoing conversations with your Regional Office staff. Your program specialist can provide guidance in the development of that change in scope request and help you navigate the appropriate application type, so when you talk with them about your implementation date, they can help you to navigate whether it would be best to embed that within a continuation application or whether it makes the most sense to submit it as a change in scope amendment. Regardless, they're going to be the ones who are going to be able to help you and determine which application type is going to be the most appropriate for what you're looking to do.

Gretchen: Thank you, Heather. As always, your responses are insightful and very much appreciated.

Heather: Thanks.

Gretchen: Before we move into some questions related to ERSEA, we'd like to do a quick poll. We'd like programs to think about what strategies your program has found to be effective in recruiting children and families. If your successful strategies are not listed here and you choose other, please feel free to share those strategies in chat.

Glenna, do we have results?

Heather: I'm seeing lots of social media in the chat, Gretchen.

Gretchen: Lots of social media, word of mouth really by a landslide, 83% of participants indicated word of mouth. Again, based on some of the questions that we've already posed to you, Heather, we can see how important building relationships not only with families but communities, community partners and other folks within the service area, just how important that actually is. Hi, Shawna.

Shawna Pinckney: Hi, Gretchen.

Gretchen: Thank you for joining us today and for your willingness to help out with some ERSEA-related FAQs.

Shawna: Thank you for having me.

Gretchen: Can you talk to us about when programs can start using the 2022 poverty guidelines?

Shawna: Sure, thank you for this question. The HHS Poverty Guidelines went into effect on January 12th of 2022, so this year. Typically, increases have been between 1 to 2% to account for inflation, but in the 2022 poverty guidelines, we saw increases of 4 to 5%, so that's a pretty big jump from what we typically see.

Many programs have continued to ask us if we can, the Office of Head Start, can adjust or change these guidelines, so we wanted to point out that the federal poverty guidelines are established across the federal government. They're not established by the Office of Head Start. While programs can begin or did begin using these new poverty guidelines immediately, we don't expect you to go back and reverify incomes for families that are already enrolled. We recognize that while families may be earning more, they are certainly still considered to be in poverty. This further emphasizes only our important work of Head Start programming and our work with families and communities to understand their needs and ensuring that the programming you're providing is responsive to their needs.

Gretchen: Yeah, it certainly was a big increase that we saw, Shawna. Thank you. Can you talk to us about how programs know what documents to collect when determining income eligibility?

Shawna: Sure, so I would draw folks' attention to the Head Start Performance Standards, our federal regulations, specifically to 1302.12. That is titled, "Determining, Verifying, and Documenting Eligibility." I'm just going to read for you what it says. I know that folks can go to the performance standards afterwards and read for yourself, refamiliarize yourself with this standard, but it reads, "To verify eligibility based on income, program staff must use tax forms, pay stubs and other proof of income to determine the family's income for the relevant time period."

We also want to note that programs should have written policies and procedures that support eligibility determination and that you must provide training to all governing body policy council management and staff who determine eligibility on applicable federal regulations and program policies and procedures, so the training is really important. There's another subpart to that performance standard that we just want to draw your attention to on the training for eligibility, again, that programs must train all governing body policy council and management staff who determine eligibility.

Gretchen: Thanks for that, Shawna. Again, I think we're hearing another reoccurring theme. How important do programs' written policies and procedures play in determining and supporting eligibility, recruitment, selection, enrollment, and attendance? Shawna, last year there were additional considerations as programs determined income eligibility. Can you tell us, is the first \$10,200 of unemployment still excluded from determining income eligibility?

Shawna: Another really good question, so programs should consider the total unemployment benefits received when determining eligibility as expanded benefits expired last September, so September 2021. It's important to note with respect to the stimulus checks that they do not count as taxable income. Unemployment income is taxable and must be included when programs are determining eligibility, so let me just repeat that. When you're considering a family's stimulus checks, it's important to note that they do not count as taxable income, but

unemployment income is taxable and must be included when your program is determining eligibility. That said, there are no tax breaks for this current year for those receiving unemployment.

Gretchen: Thanks, Shawna. That's another important distinction for those folks that are responsible for determining eligibility. Next, I'd like to ask you questions about income categories. What's the difference between the over income category and the 101 to 130% income category as it relates to income eligibility?

Shawna: Sure. We continue to get this question. It's a really important question especially during the time of the pandemic and all of the additional sources of support that our families are receiving, so I'm going to try to go through this carefully for folks. Programs currently have the ability to enroll an additional 10% of your funded – so that's different than your actual – of your funded enrollment with children of families who are over income.

Additionally, you can enroll up to an additional 35% of children whose families are in incomes between 101 to 130%. Programs that use these allowances – so the 10% of funded enrollment over income and the 30% of families who are between 101 and 130 ... Programs that use these allowances may have up to 45% of children in your program that are over the federal poverty guidelines enrolled. Additionally, programs choosing to enroll children in families who do not meet the eligibility requirement and whose incomes are below 120% must do a couple of things, and let me go through that list with you.

Those programs must establish and implement outreach and enrollment policies to ensure the needs of eligible pregnant women, children, and children with disabilities before serving pregnant women and children who do not meet eligibility requirements. Programs should also establish criteria that ensure eligible pregnant women and children are served first. You should be able to report to your Regional Office several things: how you are, as a grantee, meeting the needs of low income children and families who are potentially eligible, what you are doing as a grant recipient by way of outreach and enrollment policies and procedures that ensure eligible children and pregnant women's needs are met first, ensure that you have efforts to be fully enrolled with eligible participants – so again, we're just running through a list of if you're choosing to enroll families who are not eligible, so we're asking you to ensure that you are fully enrolled to the extent possible with eligible participants – that you have policies and procedures and selection criteria to serve those eligible children, that your current enrollment and enrollment from the previous year are documented, that the number of pregnant women and children served are disaggregated by eligibility criteria, and then finally, we would ask for you to notify your Regional Office of the eligibility criteria for each child on the wait list. Finally with respect to this question, it's important to note that programs should seek approval of policies and procedures in conjunction with the approved selection criteria only after discussion and approval from your governing bodies.

Gretchen: That was a lot, Shawna. Just to recap, what I heard you say is that programs that choose to use these allowances and have policies and procedures along with selection criteria that's been approved by their governing body may have up to 45% of children over the federal poverty guidelines enrolled.

Shawna: That's correct.

Gretchen: Thank you so much for that clarification. One last question for you, what should a program do if it fills over income slots based on full funded enrollment, and then that actual enrollment drops?

Shawna: Another really important question, so the 10% over enrollment slots are based on a program's actual enrollment, not the funded enrollment, so that's based on your actual enrollment. Grant recipients should use the number of children actually enrolled to calculate the 10% ... Again, not using your funded enrollment but the number of children that are actually being served to calculate your 10%. We, the Office of Head Start, certainly understand that programs need to plan for your over income slots, and this could be easily accomplished by using your funded enrollment number.

When a grant recipient's actual enrollment differs greatly from your funded enrollment, the number of over income slots should still be based on your actual enrollment to remain consistent with the intent of the law. The Office of Head Start recognizes that enrollment numbers may fluctuate, and we certainly will not penalize programs as you're navigating through this. Finally, with respect to this question – sort of and all of the questions in my section of the slides – you know better than certainly anyone how this pandemic has created and exacerbated inequities for the families that we serve. The number of children and families in poverty has grown significantly, and we recognize as you do that prioritizing low-income families is necessary to ensure that our programs are serving children and families with the greatest need.

Gretchen: Thank you for that, Shawna. I know programs certainly appreciate your thoughtful responses. Next, I'd like to welcome Kate Troy. Hi, Kate.

Kate Troy: Hi, Gretchen. It's great to be here with you all.

Gretchen: It's great to have you to share some additional information related to Interim Final Rule with Comment. I know this first question has been top of mind for many programs, so let's jump right in. Does the vaccine requirement apply to Part B and Part C providers, those specialists in education and related service providers for preschoolers, infants, and toddlers?

Kate: This is such an important question, Gretchen, and I know folks have been wondering this, and we've gotten a lot of questions about it, so the answer to this question is no. These providers are not covered by the vaccine requirement. Part B and C providers are not considered staff of the Head Start program, and there is no contractual relationship.

Gretchen: Thank you for that, Kate. I know programs have been anxiously awaiting a response to that question. In thinking about those programs and partnerships, Kate, how should programs implement the vaccine requirement, such as school districts or other partnerships in service delivery at this point in the year, understanding that contracts and MOUs are in place?

Kate: This is another really great question, and I know that folks have been patient waiting for more guidance in this area. Early Head Start-Child Care Partnerships are covered to the same extent as standard Head Start and Early Head Start programs. For other provider relationships, programs should work to resolve issues with contracts or MOUs, including for staff working

with enrolled children, that arrive from the IFC in a manner that minimizes disruption of services to children and families for the balance of the 2021-2022 program year. Programs should make decisions that cause the least amount of disruption and also support programs to safely get through this program year. We know when there are contracts and MOUs in place, it takes some time to adjust things, and so that's why we have this particular guidance for the remainder of this program year.

Gretchen: Thank you for that, Kate. Do the IFC requirements apply to those observing in Head Start programs for the purposes of QRIS or licensing or individuals conducting fire inspections?

Kate: Thanks for raising this, Gretchen. I'm happy to answer this to provide some clarity. I know we've gotten this question a number of times. The vaccine requirement in the IFC rule does not apply to those inspecting programs for purposes like QRIS, health and fire safety, and licensing, so these individuals are not service providers nor are they working directly with enrolled Head Start children and families. Instead, they're really serving in an observational or an inspection role, so that is with respect to the vaccine requirement. Now per the IFC, these individuals do need to be masked as part of the universal mask requirement.

Gretchen: Kate, can you talk about the updates to the CDC recommendations and what that means for Head Start programs?

Kate: Yes, absolutely. On February 25th, the US Centers for Disease Control and Prevention, the CDC, released new recommendations for COVID-19 what they're calling community levels, which help individuals and communities make choices on what precautions they want to take based on the level of disease burden in their community. In conjunction with this updated COVID-19 Community Levels, the CDC recommends that people should wear masks depending on the level of COVID-19 in their community.

As a result, the CDC recommendations differ from the masking requirement in the Interim Final Rule with Comment for Head Start programs, so we're very aware of this, and I know that we issued this guidance really very quickly to the field on February 28th, and in that guidance, we mentioned, explained this, and we really said that this time, the IFC really remains the applicable regulation for Head Start programs except in those parts of the where OHS is subject to preliminary injunctions and temporary restraining orders which really prevent the implementation and enforcement of the rule in those areas. Head Start programs should continue to follow the requirements laid out in the IFC in all states that are not subject to preliminary injunctions or temporary restraining orders.

I think there's more to this answer, too. There's a little bit more to further elaborate. When reviewing the new CDC recommendations, OHS will not evaluate compliance with the mask requirement in its program monitoring. We often get questions, well, what does this mean for monitoring? While we are reviewing the new recommendations from CDC, we are not evaluating compliance with the mask requirement for purposes of program monitoring. This, what we're calling a pause on monitoring for compliance with the mask requirement will apply to all programs, and before resuming monitoring for compliance with the mask requirement, OHS will provide grant recipients at least two weeks' notice prior to implementing any changes. We also advise Head Start programs on the importance of continuing to use layered mitigation

strategies to reduce transmission, so these strategies include masking and testing, physical distancing, hand washing, cleaning, and ensuring well ventilated spaces, and these strategies remain critically important to protect the health and safety of staff, children, and families. And as we all well know, we serve children under 5 years of age who are not yet eligible for vaccination, and some of them are more susceptible to complications from COVID-19.

Gretchen: Thanks, Kate. We know how important those layered mitigation strategies are especially for the population served by Head Start and Early Head Start programs.

[Chatter]

Gretchen: ... for sharing the most up to date IFC information.

Kate: Thanks, Gretchen.

Gretchen: Hi, Adia.

Adia Brown: Gretchen.

Gretchen: How are you?

Adia: I'm doing pretty good.

Gretchen: You just heard the information that Kate shared regarding the IFC, and we know that the IFC remains the applicable regulation for Head Start programs except for those in parts of the country where the Office of Head Start is subjected to preliminary injunctions and temporary restraining orders. I'd like to talk to you about monitoring as it relates to vaccine and masking requirements. First, how will the Office of Head Start monitor the vaccine and masking requirements?

Adia: Gretchen, everybody always wants to talk to me about monitoring. It's like that's always what they want to talk to me about, and hopefully people who are on this call, some people have already gotten monitored, so they know that what we're doing is, we're only monitoring this during the FA2. If you're going to get an FA2 review, then we're going to monitor this particular requirement, but we only look at certain things. We're going to look at the recipient's process for documenting the vaccine status. We're also going to see whether or not the grant recipient should have documented the total number of staff who are fully vaccinated and any who are exempt. Basically, we're looking for your paperwork around this, so when the review team comes out, they're going to look to see whether or not you know who's gotten vaccinated, who has an exemption, things like that. As a program, you'll be able to show that to reviewers, and they'll be satisfied with that.

The CDC released new recommendations on COVID-19 Community Levels which will help individuals and communities make choices on what precautions they may want to take based on the level of disease burden in their community, so that means you have to pay attention to what the CDC is saying and how it's affecting you. Programs, while you're doing that, make sure that you know that that's happening. While reviewing the new CDC recommendations, OHS will not evaluate compliance with the mask requirement in its program monitoring. Basically, we're not really looking to see what's happening with masking. Programs should make sure that basically your community levels, that you understand when it's time to be masked. I'm in

Philadelphia, and they actually just put an article in the paper that now Philadelphia has to wear indoor masks again because of the vaccine ramping up there. You should know what's happening in your community and make sure you're following the CDC guidelines, but the monitoring team won't be looking at masking. How's that, Gretchen?

Gretchen: That's perfect, Adia.

Adia: Great.

Gretchen: Can you talk about what documentation of vaccine status or testing the Office of Head Start is going to require during those monitoring reviews?

Adia: All grantees should really be thinking about how they want to process and track vaccines. You can use things like vaccine cards or your testing procedures or your intent to test weekly for people who haven't been vaccinated, so review teams will come and look for those different things. They're going to look for your documentation and how you're maintaining your understanding of whether or not people have been vaccinated in the program.

Gretchen: Adia, will the Office of Head Start issue a monitoring finding if the program has difficulty determining the vaccine status of partners and other folks who are not employed by the program who provide services to enrolled children?

Adia: Gretchen, I wish I had a nickel for every time I was asked that. [Laughter] No, we're not going to penalize people if their partners if they're not able to find out from their partners whether or not everybody has been vaccinated. Grantees should really make sure that they or program should really make sure that they know that they have policies and procedures that are used to maintain a safe environment for children. What we're going to be looking for is your policies and procedures. Do they include things like, do you have signs up that require you to do things like test your partners or if people need to wear masks, things like that? Again, we're not testing masking right now, but we want to make sure that you have the policies and procedures in place to keep children safe, but we will not penalize programs if they can't get good information from their partners.

Gretchen: And lastly, Adia, will Office of Head Start issue deficiencies for masking or vaccine requirements?

Adia: That's a good question. Right now, programs who do not meet the expectation around the development of policies and procedures for documenting vaccination, so remember, this is about vaccines. We're not really looking at masking right now. Masking is off the table. But for those programs who really don't have any policies and procedures, or they don't really have anything in place for tracking. If you just have absolutely nothing, we will consider identifying areas of concern or a noncompliance, not really looking at deficiencies, but we are looking at noncompliance's that may be identified during a review, but anything ... I'm sorry. You may look at ... We may issue noncompliance for those things, but anything that we actually issue a noncompliance for, if a program doesn't correct it within the required time frame, it could turn into a deficiency, so all programs want to make sure that if you are issued a finding for one of these things that you quickly work with your Regional Office to make the corrections.

Gretchen Jurgens: Thank you for that, Adia.

Adia: Welcome, Gretchen.

Gretchen: We've got a couple of questions for you regarding workforce if you would stick around for those, but first, we'd like to do another poll.

Adia: All right.

Gretchen: We'd like to hear from programs what type of financial incentives your program has provided to staff using CARES Act, CRRSA, and/or ARP funding. Again, for folks who select other, please feel free to share your specific financial incentives in chat.

We'll give participants just a few more seconds to answer. If we can see the results ... Adia, it looks like most programs who responded are using those incentives for the purposes of retention of their staff. Then as a follow-up to that, for those programs that are providing any type of financial incentive, we'd like to understand the monetary range of that incentive.

We'll give participants just a few more seconds. If we could see the results of this poll ... We're pretty equal, Adia, across the board for programs that have participated, but again, it looks like programs are using CARES Act, CRRSA and ARP funds to incentivize their staff. Knowing that, this next question may reinforce what many of our programs already know: Can programs provide staff with financial incentives using ARP funds?

Adia: Great question, Gretchen, and you know what? This is not my wheelhouse, but I'm going to go off of what I have in front of me, so financial incentives can be a powerful tool to promote staff retention and recruitment, particularly for positions that are difficult to fill or experiencing high turnover. Many employers within and outside of the education sector are appealing to workers by offering financial incentives such as retention and hiring bonuses. Such incentives vary widely both in monetary amount and distribution schedule. OHS strongly encourages all programs to use ARP funds, operation funds from base grants and any other source of COVID-19 release funds to offer competitive financial incentives to staff to help stabilize their workforce in the near-term.

Gretchen, yes, people can use their ARP funds and many other funds, but please be mindful of any applicable grant requirements that must be met including period of availability for different funding sources. OHS encourages programs including those who have already offered such incentives to reevaluate the amount of monetary incentives that are necessary and reasonable to retain and recruit staff. OHS reminds programs that any financial incentives are subject to an established written policy of the grant recipient for allowability.

Yes, you can use your funds, but make sure that you don't get yourself into trouble by not following all of the grant incentives and requirements.

Gretchen: And again, Adia, we're hearing that recurring theme of established written policies and procedures and how important those are.

Adia: Always, Gretchen, always.

Gretchen: Adia, in the intentional workforce planning webinar, we shared staff qualification resources with participants, so I'm wondering if you can talk a little bit about which Head Start staff are eligible for a teacher qualification waiver.

Adia: Gretchen, that one is easier. Of course, I can, absolutely. The first thing I want to tell you is who is not, so you're going to hear this two times in the slides. It's going to come up again, grantees. Make sure you take note of this. EHS or Early Head Start teachers are not eligible for a waiver, so if you have Early Head Start teachers, know right away that right off the bat, those guys are not eligible. However, preschool teachers are, so preschool teachers are eligible for a waiver. They have to be enrolled in a program that grants a qualifying degree, so there's a lot of important things. They have to be trying to work towards at least an associate degree in early childhood education or an associate degree in a related field, but you can request a waiver for preschool teachers, and if you're requesting that waiver, the preschool teacher should have at least the following: a current CDA, that's really important, or a state-awarded certificate for center-based preschool teachers. If you have a CDA or you have the center-based award and you still need to get more qualifications, you absolutely can request the waiver for Head Start teachers only.

Gretchen: Adia, we understand that there's definitely some initial steps that the programs can take in helping to prepare to request a qualification waiver, but what does that process actually look like in requesting a waiver, again, for the Head Start center-based preschool teacher?

Adia: All right. Now this is going to be some important stuff that I tell everybody, Gretchen, so hopefully people are taking out their papers and their pencils because I'm sure there's a lot of people out there that really want to get these waivers, so here we are. This is how you do it, OK? Programs submit waiver requests to their Regional Office for approval, so everybody out there knows who your Regional Office program specialist is. You have a great working relationship with them. You talk to them all the time. You have those once-a-month calls. This is a great time for you to say, "Hey, program specialist, I need a waiver," so you're going to actually submit a waiver request to them in person, OK?

You have to have evidence that the Head Start agency has unsuccessfully attempted to recruit an individual who has at least an associate degree in early childhood education or in a related field, so the first thing you have to do is say, "Hey, we can't find anybody. We can't recruit anybody. There's nobody out there, so, Regional Office program specialist and staff. We need a waiver." You also have to have evidence that the individual for whom the waiver is requested meets the requirements that we listed in the previous slides, so I was paying attention earlier, and everybody is saying, "Can I get a copy of these slides? Can I get a copy of these slides?" Yes, you get a copy of these slides, and you should make sure that you refer back to those slides so that you know exactly who you can request a waiver for.

A qualification waiver may be submitted for an individual teacher for a period not to exceed 3 years, so, Gretchen, I do all the monitoring, so I go out, and sometimes I go to programs, and they've had people for a little longer than 3 years that may not have gotten their teacher qualifications, so you want to make sure that with that, this person can get those qualifications within a 3-year period of time, really important. And OHS Regional Office staff review and determine whether to grant approval for those qualification waivers, so it's not automatic. They actually will get what you submit. You have a conversation with them. They make sure that it meets all of the things that I just discussed. Then we can get a waiver for qualifications. Gretchen, how does that sound?

Gretchen: That sounds really great, Adia. I have to ask this question again, though. Is there a qualification waiver available for Early Head Start teachers?

Adia: Gretchen, I'm going to make you give me that nickel. No. The Head Start Act does not include a provision for qualification waivers for Early Head Start teachers, so you have to look at the regulations and make sure that we can hire Early Head Start teachers that they meet the qualifications because we don't provide a waiver for that group of individuals.

Hey, Gretchen, you still there?

Gretchen: I'm still here.

Adia: All right.

Gretchen: Adia, we know that programs have experienced the benefits of staff working with coaches and how important working with coaches can be, beneficial, particularly during onboarding and for newly hired staff. I'm wondering if you can talk a little bit about what an active professional development plan is.

Adia: Of course, I can, Gretchen. My reviewers, they see these plans all the time. Get to see copies of them, and I get to see pictures of them, all different kinds of things, so I get to learn about active professional development plans all the time. Now, here is what they should look like. One, they should reflect a reasonable time frame for completion of the target degree or credential. That's super important, so remember that 3-year waiver? We want people to try to get these qualifications at least within 3 years, so your professional development plan should have active steps to help people reflect on that time and start to make some movement towards getting those degrees. A lot of times, people may want to develop a professional development plan, and it's not moving anybody anywhere. That's not really an active plan, so we want to make sure that movement is happening. The other thing is that we want to make sure that an active plan demonstrates how the staff person is actively working towards completion of the degree or the credential, so we want to know they're in school, or they're taking classes, or they're doing whatever it needs to make sure that they are getting that credential or that they're going to be on the way to doing so.

The program can choose to use Head Start funding to offset the costs associated with staff obtaining their degree, so you can use your funds to actually help people get their degrees and start actively moving towards that. A program is responsible for conducting ongoing oversight to make sure staff are making progress and meeting timelines for achieving degrees or credentials. This part is really important, so you should have people periodically check in with the staff, make sure that they're making progress, make sure that they've taken the right number of classes, and they're passing the classes so they can actually get the degree they need. But an active professional development plan will certainly help staff get there.

Gretchen: Adia, programs get coaches in place, oftentimes, those coaches are supporting staff in the development of their active professional development plans, and all of those strategies are important to current staff, but what about staff vacancies? How can programs increase their applicant pool?

Adia: Wow, Gretchen, this is a really good question. There's a lot of people out there who you can ... into to really help you think about getting more staff into your program. Your substitute staff pool, they're really important. Those are folks who are substituting, and they may be people who have an interest in coming onto the Head Start program long-term or the Early Head Start program long-term, so think about them.

The other thing that Head Start has always, always, always encouraged is trying to hire parents. Parents of one of our top resources, and they are the people who really come in and out of the program. They believe in the program. They love the program. They always want to be a part of Head Start, so anytime you can grab a parent and start to develop that parent and help them sort of come into an entry-level position and be a part of Head Start, it's always great. There's other people like community members, college students. All are good sources of potential substitutes and even eventual staff, so you should really broaden your perspective, look out there and see who may want to work for Head Start.

Intentional recruitment of current and former Head Start parents is always super important and starting an apprentice program might be something that's super helpful to you as a program, so the US Department of Labor is currently accepting applications for funding to start or support existing registered apprenticeships, so that's a word. Every time I hear apprentices, I think about Mickey. Do you remember Mickey Mouse, and he was the apprentice for the wizard? But this is a Head Start apprenticeship, and it can be just as magical. You can get funds for it, and that's going to be open until April 25th so lots of different ways that you can have to try to increase your applicant pool. You will have these slides, and you will be able to read along and find a lot of resources right there.

Gretchen: That's great, Adia. Thank you. Last question for you, last one. It's the last one, last one, I promise.

Adia: All right. All right. I'm here. I'm in for it. Come on.

Gretchen: OK. Let me know, the Office of Early Childhood Development and the Department of Education jointly hosted a webinar for early care and education workforce, and the webinar's intent was to highlight the flexibilities that are offered through the limited Public Service Loan Forgiveness waiver. Are Head Start staff eligible for that Public Service Loan Forgiveness?

Adia: Well, many Head Start staff are likely eligible for the Public Service Loan Forgiveness program. I'll actually tell you something, Gretchen. Way back, a long, long time ago when I was super young – I'm not that old now – but when I was super young, I was actually eligible for the Public Service Loan Forgiveness, and I had many of my college loans forgiven, so it's something that people should really look at. The PSLF is available to borrowers with certain types of federal student loans who work for a qualifying employer. Many Head Start programs are qualifying employers because they are operated by nonprofit, government or school organizations. There is currently a time-limited waiver with the PSLF that allows for payments to be counted towards forgiveness that were not previously considered. The limited waiver is available to those who are eligible and apply for the program before October 31st, 2022, so before Halloween, apply. OK?

The Administration for Children and Families, ACF, and the US Department of Education recently hosted a joint webinar on the PSLF program including time-limited waiver. The webinar recording is available at this very long URL that you will be able to click when you get this presentation. But Head Start family, please, please, please, please apply. Try because many Head Start programs are qualified for this, and I am a person, a benefactor of Public Service Loan Forgiveness, and I will tell you, I was very happy when all my student loans were paid for, so please apply, and we really think that this is a great thing for Head Start programs. Gretchen, that's my last question, right?

Gretchen: That's your last question, and Adia, I can't think of a better public service announcement than you personally sharing your experience. I think that the Public Service Loan Forgiveness program is certainly an added benefit for current employees, but I think grant recipients can also use this as a recruitment strategy for those potential applicants to build those teaching positions, knowing that they might be eligible then for the Public Service Loan Forgiveness program as well.

Adia: Well, Gretchen, what a great tip from a great moderator, and thank you for asking me those questions today.

Gretchen: Thank you. Thanks, Adia.

Adia: All right. Bye-bye.

Gretchen: We've included several new workforce resources, specifically those that we talked about today regarding apprenticeship programs and the Public Service Loan Forgiveness waiver webinar and help tools. We have some ERSEA and community assessment resources that we've included, which also includes the newest resources that were first introduced during the Enrollment Forward series. Then next, all of the previous Enrollment Forward series resources and recordings are currently available on ECLKC, and today's webinar and transcript will be available shortly on demand for folks. And at the beginning of the presentation today, you heard Tala talk about a new resource coming soon. "Enrollment Forward In 5 Minutes" will feature video segments from the programs who participated in the fourth Enrollment Forward webinar, and that will be released later this spring on ECLKC. These clips will include an overview of the program's approach, their implementation strategies that they found success with, and financial resources that they used to develop and execute the strategies within their programs. And finally, thank you to the Head Start community on behalf of children and families for the incredible work you do each and every day.