Slide 1

Program Redesign – Change in Scope

Region XI AIAN
Dr. Betsy McDougall &
Dr. Lamont Yazzie
Grantee Specialists

Head Start Regional TTA Network

These materials were developed for OHS/Region XI Training and Technical Assistance Network under Contract No. 140D0420C0086 by ICF.

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Slide 2

Welcome

Special Welcome to All Tribal Leaders, Policy Council Members, Fiscal Staff, and Program Staff

Head Start Regional TTA Network

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Slide 3

Learning Objectives

Examine	Examine the impact of Full Enrollment and how planning and redesign can reinvigorate your program for the future.
Discuss	Discuss how data, community engagement, planning, and budgeting come together to change your scope of services.
Create	Create a plan that can effectively be implemented for a change of scope that works for your community using community data and voices successfully.

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OHS 2024 Priorities

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Head Start Management Systems Wheel

Program Planning & Service System Design

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ACF-IM-HS-22-09 Enrollment Reductions & Conversion

Information Memoranda ACF-IM-HS-22-09
Enrollment Reductions and Conversion of Head Start Slots to Early Head Start Slots

Prior to submitting a change in scope request, recipient, at a minimum, must consider **and** respond to the following:

- **Community Assessment** data to demonstrate response to community need
- **Self-assessment** and ongoing oversight to inform planning
- **Staffing and training** need for the proposed program design
- Conduct a **wage comparability study**
- **Service delivery model** that is responsive to the needs of children and families
- Impact on **administrative and supervisory structure**
- Consider **equity** when determining proposed impacts
- Evaluate program design to aid in developing a **sustainable, ongoing budget**
- **Governing board or Tribal Council and Policy Council** input

QR CODE FOR SESSION RESOURCES

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Considerations

Enrollment Reduction or Conversion Considerations (IM 22-09)

Why start with the community assessment?
- Demonstrates how changes meet children and family needs
- Notes community strengths and resources (including workforce)
- Considers other data sources

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Designing with your Nation in Mind

Examine Linguistic Context → Examine Cultural Context → Be Inclusive Community Circles → Embed Yourselves – Ask Community → Design w/the Child & Family in Mind

It is important to keep your Tribal Nation in mind. Each Tribe is unique. When designing any Community Assessment or Strategic Planning effort, do inclusive planning and create effective practices that work for your children and families.

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Community Assessment – Deep Data Dive

| Demographic information about eligible infants, toddlers, preschool age children, and expectant mothers. **Deep Data Dive:** Eligible Workforce | Information about eligible children and their families' education, health, nutrition, and social service needs. **Deep Data Dive:** Employment | Work, school, and training schedules of parents with eligible children **Deep Data Dive:** Resources available in the community to help recruit and provide training. | Information about other child development services, childcare centers, and family childcare programs that serve eligible children **Deep Data Dive:** Competition and/or Partnerships | Strengths of the community **Deep Data Dive:** Strengths focused on partnering with federal/state/local/tribal programs to recruit and provide training. | This data is included in the Five-Year Grant Application baseline and continuation application. **Action Plan:** A Workforce Plan to strengthen your recruitment, hiring, and retention practices. |

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Slide 10

Self-assessment, Program Improvement Plans, & Ongoing Oversight

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Slide 11

Wage Comparability Study, Staffing, & Training

Head Start Act Section 653

HSPPS 45 CFR §1302.90(a) Establishing personnel policies and procedures requires written personnel policies and procedures

Uniform Guidance 45 CFR §75.430 applies a standard of reasonableness

Fair Labor Standards Act (FLSA)

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Slide 12

Data – Establish Conclusions and Recommendations

Establish Conclusions & Recommendations
Be Inclusive – Who is On Your Team?

Decisions about center locations can be difficult to make. Your considerations include staffing patterns, budget considerations, the availability of sites, and their accessibility to families. Sometimes, programs need to make difficult recommendations based on changing patterns of residence or employment. Your data analysis may indicate your program should consider closing a center or relocating services closer to where families live and work.

On the other hand, your data analysis may indicate that more eligible families are arriving in the service area. If findings result in the need for expansion of services, be creative in seeking solutions, such as partnering with community-based programs or seeking funding from other sources if Head Start funding is not available.

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Slide 13 — Determining Program Structure

1302.20 Determining program structure.

(a) Choose a program option. (1) A program must choose to operate one or more of the following program options: center-based, home-based, family child care, or an approved locally-designed variation as described in §1302.24.

(b) The program option(s) chosen must meet the needs of children and families based on the community assessment described in §1302.11(b).

(c) A Head Start program serving preschool-aged children may not provide only the option described in §1302.22(a) and (c)(2).

A. Center-based ratios and group size - cannot be waived for children < 24 months
B. Center-based duration
C. Selection of home-based-only setting in Head Start
D. Home-based caseloads
E. Home-based duration
F. Family childcare ratios and group size
G. Family childcare duration

(4) Consistent with section 645(d)(3) of the Act, any American Indian and Alaska Native grantee that operates both an Early Head Start program and a Head Start program may reallocate funds between the programs at its discretion and at any time during the grant period involved, in order to address fluctuations in client populations. An American Indian and Alaska Native program that exercises this discretion must notify the regional office.

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Slide 14 — Service Delivery Model

Change in Scope: Service Delivery Model

Programs must carefully review data related to:
- Enrollment and recruitment of families
- Demographic changes in the community
- Geography of poverty in service area
- Other factors presenting challenges in meeting community need or providing high-quality services

Programs proposing changes to the existing service delivery model must:
- **Explain** how the proposed changes will meet community need
- **Address** the underlying issues causing identified challenges
- **Discuss** changes by program option, center and service duration in terms of slots
- **Update** program schedule to reflect proposed changes
- **Meet** service duration requirements (Program Structure, 45 CFR §1302 Subpart B), including comprehensive year-round services in Early Head Start

QR CODE FOR SESSION RESOURCES

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Slide 15 — Administrative and Supervisory Staff Structure

Narrate the following for your Change in Scope:

1. Are the **percentages of non-program staff salaries** charged to Head Start and Early Head Start grants still **reasonable**, given the proposed adjustments to the program?

2. Is there an **administrative cost** that can be reduced?

3. Have **changes** been considered or made to the **organizational structure** due to the enrollment reduction or conversion, and are they **reasonable** and **necessary**?

4. How will the proposed enrollment reduction or conversion **impact supervisory staff**? Please use the questions below to assist in the planning and development of the request:
- Are **supervisory positions reasonable and necessary** based on the proposed enrollment reduction or conversion?
- What is the **justification** for keeping or **eliminating supervisory positions**?

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Equity Considerations

When writing your narrative, think about your data:

1. Groups that are historically marginalized populations:

   - Black, Latino, Indigenous and Native American, Asian Americans and Pacific Islanders, and other people of color
   - Children experiencing homelessness
   - Children in foster or kinship care
   - Children with disabilities
   - Children who are dual language learners

2. Inclusive decision-making processes.
3. Impact on communities and continuation of care planning so there is not a disproportionate slot loss.

Head Start Regional TTA Network

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Budget Considerations

The budget and budget narrative should explain **all changes** as a result of the proposed Head Start or Early Head Start enrollment reduction or conversion. Cost savings associated with serving fewer children must **include a description** by line item within each object class category. The **repurposed use of funds** must include a description by line item within each object class category to **support the primary reason** for the request. **It is critical that the budget is built based on need, sustainability, and the ability to provide high-quality services.**

- Staffing and personnel — is the current staffing pattern necessary and adequate?
- Fringe benefits
- Equipment
- Contracted services (e.g., data system, payroll, health and mental health, etc.)
- Transportation
- Facilities (e.g., rent, utilities, insurance)
- Maintenance
- Supplies (e.g., office, educational, food service, diapers, formula)
- Out-of-town and local travel
- Indirect costs
- Administrative costs
- Other

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Budget Development Processes

Data, Recommendation, Change of Scope Drafted	Staffing Considerations, Wage Scales Reviewed	Organizational Chart Revised and Administration Chart Narrated
Budget Development Aligned with Change of Scope	Wage Scales Aligned Administrative Costs Reviewed Costs Allocation Applied	Indirect Cost Agreement Applied Governance Review OHS Review

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Additional Considerations

Timeline Program Schedule	Coaching Plan Training Plan	Curriculum Assessments Development Screenings
TTA Support Community Partnerships	Determining program structure, 45 CFR §1302.20(c)(3)?	Duration Requirement Consideration Continuation of Care

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A Timeline Example: Planning Ahead

First Day of Budget Period Jan 1

Community Assessment

Goals Formed

PIR DUE

Funding Guidance Letter (FGL) Received

Annual Report

October 1 Grant Submission Due

Ongoing Monitoring

Self-Assessment

Last Day of Budget Period Dec 31

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What is Cost Allocation Plan?

Sunshine Center Cost Allocation Plan

	Head Start	Early Head Start	Adult Basic Ed
Classrooms	3,000		2,000
Offices		2,000	
Meeting Room • 30 hours ABE (75%) • 10 hours EHS (25%)		250	750
Subtotals:	3,000	2,250	2,750
Percentages:	3,000/8,000=38%	2,250/8,000=28%	2,750/8,000=34%
Common Areas:	38% x 2,000=760	28% x 2,000=560	34% x 2,000=680
Entire Center:	3,760	2,810	3,430
		Total:	10,000

Documentation of the *methods* used by the organization to fairly and equitably underline allocate the shared costs of the organization to programs benefiting from those costs

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Cost Allocation Plan Components

Cost Allocation Plan Components

- Sources of all revenue
- Number of children served by funding sources (attendance vs. funded enrollment)
- Methods used to determine allocations
- Basis for allocating costs within specific cost categories
- A narrative explanation of plan justification

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Resource: Early Childhood Learning and Knowledge Center

Getting Young Children and Their Families
Ready for School and Ready for Life

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ECLKC: Policy & Regulations

Head Start Policy & Regulations

Head Start Act

Head Start Program Performance Standards

Fiscal Regulations

Program Instructions

Information Memoranda

Exploring the Head Start Program Performance Standards

Child Care Policy & Regulations

Federal CCDF Regulations

State Licensing

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Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-IM-HS-22-09	2. Issuance Date: 11/07/2022
	3. Originating Office: Office of Head Start	
	4. Key Word: Enrollment Reduction; Slot Conversion; Change in Scope Requests	

INFORMATION MEMORANDUM
TO: All Head Start and Early Head Start Grant Recipients

SUBJECT: Enrollment Reductions and Conversion of Head Start Slots to Early Head Start Slots

INFORMATION:
The Head Start program is a national model in the field of early care and education (ECE) for providing high-quality services to children and families most in need. Head Start programs provide comprehensive services and promote progress in children's early learning outcomes in under-resourced communities and support positive family outcomes.

The Office of Head Start (OHS) recognizes that community needs shift over time for various reasons. These reasons may include changes during and after disasters and public health crises, changes in the availability of community resources relied upon to provide program services, and shifts in geographical location of eligible children and families. Section 640(g)(3) of the Head Start Act (the Act) allows programs to propose a reduction to their funded enrollment to maintain quality of program services. Additionally, Section 645(a)(5) permits a program to convert Head Start slots to Early Head Start slots to better meet community needs. Similarly, Section 640(f)(2) of the Act allows programs to convert part-day slots to full-working day slots to meet community needs.

A request to reduce funded enrollment or convert Head Start slots to Early Head Start slots is considered a change in scope request and requires OHS prior approval. Recipients may submit a change in scope request through a continuation application or as a separate application amendment in the Head Start Enterprise System (HSES). Change in scope requests must be submitted a minimum of 90 days prior to the planned implementation date. This Information Memorandum (IM) provides additional guidance for the development and submission of these requests.

Enrollment reductions and conversions are permanent adjustments to funded enrollment. Therefore, the decision to request a reduction or conversion should be based on actual changes in the community and program adjustments necessary to maintain a high-quality program with qualified staff, supported by data and documented need, and not based on anticipated changes. It is important to consider community partnerships and resources in the service area, short and long-term goals, and program sustainability when considering a change in scope request.

Programs must demonstrate that a change in scope request is data-informed and explain how the requested changes will improve quality of services for children and families, better meet community needs, support staff, and promote a sustainable program.

What to Consider Before Requesting an Enrollment Reduction or Conversion

Prior to submitting an enrollment reduction or conversion request, recipients must consider, at a minimum, the following.

Community Assessment
Programs are required to conduct a community assessment at least once over the five-year grant period and review and update it on an annual basis to reflect any significant changes. When considering a change in scope request, it is essential to demonstrate how the proposed changes will best meet the needs of eligible children and families and consider strengths and resources of the community.

Annual Self-assessment, Program Improvement Plans, and Ongoing Oversight
As described in 45 CFR §1302.102(a-b), programs must conduct an annual self-assessment to evaluate: progress in meeting established agency-determined program goals, compliance with the Head Start Program Performance Standards (HSPPS), and the effectiveness of professional development and family engagement systems for improving children's school readiness in alignment with the Head Start Early Learning Child Outcomes Framework. The data collected must be used for continuous improvement, including development and implementation of program improvement plans to strengthen any identified areas of need (45 CFR §1302.102(b-c)). Programs are also required to implement a system with procedures for the ongoing oversight of meeting program requirements in which data is collected to inform the process. Programs must use data from both the annual self-assessment and ongoing oversight, alongside other program data, to inform their program improvement plans.

Staffing and Training
Programs must consider the staffing and training needs for their proposed program design, including necessary compensation and staff supports to implement a sustainable high-quality program. A stable, healthy, highly skilled, and well-compensated workforce is vital to providing the highest quality of services to promote children's development and support families. Programs should consider the availability of qualified staff in their community and the types of training, education, compensation, and supports necessary to attract and retain staff. Further guidance on strategies to support the Head Start workforce can be found in ACF-IM-HS-22-06 Strategies to Stabilize the Head Start Workforce. Programs are expected to use their data on staff, enrollment, and service delivery to inform changes to support a high-quality workforce while not reducing the quality of services for children and families.

Wage Comparability Study
Programs conduct wage comparability studies to evaluate and set fair compensation rates and support compliance with Section 653 of the Act. Wage comparability studies compare the compensation rates of current Head Start employees and the pay scales for positions in the program to compensation paid for comparable services in the service area or other neighboring

areas, including salaries for ECE and elementary school staff. If requesting a change in scope for the purpose of freeing up funds to increase staff compensation, the program's request should be supported by findings from the wage comparability study or by current data on comparable wages in the community or documented challenges in filling vacancies that impact the program's ability to deliver high-quality services. Programs should focus on positions for which staffing challenges are most pressing and are impacting the program's ability to provide high-quality services to their funded enrollment. Research has shown ethnic and racial disparities in pay exist for the ECE field, so programs are encouraged to consider equity issues in pay and benefits for staff.

Service Delivery Model
When proposing changes to the existing service delivery model, it is critical the process is data-informed and draws upon information from community assessments, annual self-assessments, program improvement plans, ongoing oversight, wage comparability studies, enrollment, and other relevant internal and external data. Programs must carefully review data related to enrollment and recruitment of families, demographic changes in their community, the geography of poverty in the service area, and other factors presenting challenges in meeting community needs or providing high-quality program services. Programs should then review their proposed program design to make sure any requested changes to services and resources are aligned to meet the needs of the children and families in their community and address the underlying issues causing identified challenges.

Service duration should also be considered, as research supports the importance of longer hours of high-quality education and development services in achieving meaningful child outcomes and preparing children for success in school. Programs operating for longer hours may also better support parents' education, job training, and employment opportunities. Programs that received funding to increase service duration in fiscal years 2016 or 2018 must demonstrate they are not eliminating, converting, or reducing the duration of services to enrollment slots supported by duration funding. As a reminder, Head Start center-based programs are required to provide at least 1,020 annual hours of service over a period of at least eight months per year for at least 45% of their center-based enrollment. Family child care and Early Head Start center-based programs are required to provide at least 1,380 annual hours of service for 100% of their enrollment slots. These requirements are found in the HSPPS at Program Structure, 45 CFR §1302 Subpart B.

Administrative and Supervisory Staff Structure
Programs should carefully assess how proposed changes to the program design will impact the administrative and supervisory structure. Depending on the proposed change and overall size of the organization, positions that do not provide direct classroom services may present opportunities to either eliminate or combine other positions with minimal impact on program quality and operations. Programs should also review the reasonableness of the percentage of each administrative staff's compensation which is being charged to the grant and be sure that the percentage is consistent with the amount of time that individual is engaged in Head Start or Early Head Start matters.

Recipients with indirect cost rates need to make sure Head Start and Early Head Start programs are fully benefiting from any costs charged, using these rates, to the grant. As a reminder, complying with the 15% administrative cost limitation does not, in and of itself, mean there are not administrative costs which can be reduced. If proposing salary adjustments for administrative or supervisory staff, please include a justification and listing of the annual salaries and amount charged to the grant.

Equity
Programs are encouraged to carefully consider how the outcomes of the proposed request will affect different demographics. This includes historically marginalized populations, such as Black, Latino, Indigenous and Native American, Asian Americans and Pacific Islanders, and other people of color; children experiencing homelessness; children in foster or kinship care; children with disabilities; and children who are dual language learners. In addition, programs should consider whether the proposed program design will improve or exacerbate existing disparities and how the proposed program design will be perceived by different populations within their service area. Where possible, programs are encouraged to include in the decision-making process those who will be affected by changes to the program.

Ongoing Budget
When considering a change in scope request, programs should first consider their vision and goals for services and construct a budget accordingly. Then, the grant recipient should evaluate their existing program design and enrollment to determine what necessary program and budgetary adjustments are needed to achieve that vision. Considerations of the program's anticipated costs for annual operations, program options, staffing and ratio requirements, as well as differences in equipment and supplies, should be assessed. Staffing ratios must ensure compliance with the HSPPS. For staffing positions that do not have mandated ratios, please include the rationale used to determine the full-time equivalents needed for such positions. In addition, a detailed budget narrative justification for changes within and between each object class category is required. As always, proposed expenses will be evaluated for reasonableness and allowability and how they support high-quality services.

How to Submit a Change in Scope Request

Change in scope requests must be submitted as part of a continuation application or as a separate change in scope application amendment in HSES, at minimum, 90 days prior to the planned implementation date. However, programs are strongly encouraged to work closely with their Regional Office throughout the planning and development of the request. This will make sure the proposal and application meet all the requirements prior to official submission of the request.

All change in scope requests must include complete program schedules, application narratives, and detailed budget narratives. Change in scope requests must demonstrate the proposed program design will deliver the full range of services consistent with 45 CFR §1302.20(b). In addition, the requested program design must effectively support the appropriate development and progress in children's early learning outcomes as outlined in Education and Child Development Program Services, 45 CFR §1302 Subpart C. Program and budget narratives for Head Start to Early Head Start conversions must address all items outlined in 45 CFR §1302.20(c) and the

Head Start Grant Application Instructions. Governing body or Tribal Council and Policy Council approvals are required prior to submitting a change in scope request. All change in scope requests are subject to approval by OHS. Additional information outlining critical questions and data to consider as part of the planning and development for both enrollment reduction and conversion requests is detailed in the [Enrollment Reduction and Conversion Appendix](#).

If you have any questions regarding this IM, please contact your regional office. Thank you for the work you do on behalf of children and families.

Sincerely,

/ Katie Hamm /

Katie Hamm
Acting Director
Office of Head Start

Community Assessment Matrix

The community assessment describes the context in which a Head Start and/or Early Head Start program operates and is useful for ensuring that the right services are provided to the right population. This resource can assist program staff in coordinating their efforts to gather information required for a community assessment. The assessment paints a picture of the community and describes the diverse needs of families who may receive services. In addition, the community assessment covers the community's history, its economic and political scene, and the community's strengths and challenges. Note: Italicized items are required by the Determining community strengths, needs, and resources, 45 CFR §1302.11(b)(1) Subpart A.

"Triggers" for Data Collection *(Customize this list and add information not listed. What do you want to know?)*	Information Source *(Who/What agency or resource can assist you in gathering the information you need for your community assessment?)*	*These columns can be completed upon return to your programs*		
		Responsible CA Team Member	Date Initiated	Date Completed
General Area Description – Demographics				
• *Proposed service area–* Geographic boundaries (size, counties, distinguishing characteristics) • Governing structure • Population and related trends • Racial and ethnic composition • Language spoken by families and children • Gender, ages • Household composition • Economic activities • Future trends • Median income level • Principle source of income • Number / percentage below poverty level				
Head Start ELIGIBLE Children and Families				

• General
  ○ *Number of eligible infants, toddlers, preschool age children and expectant mothers*
  ○ *Geographic location*
  ○ *Race and ethnicity*
  ○ *Languages spoken*
  ○ *Number of children experiencing homelessness*				

o *Number of children in foster care* o Household composition o Principle source of income o Median income level / employment o Number of children living below poverty level o Number of public assistance recipients o Number of children who are DLLs				

Education Needs of Eligible Families				
• Education • Adult educational attainment • Drop-out rates • Information on functional literacy levels				

Health and Social Service Needs of Eligible Families				
• Incidence of child abuse and neglect • Reports of domestic violence • *Number of children with disabilities, including types of disabilities, including types of disabilities* • Rates of drug and alcohol abuse • Number of children born to addicted mothers • Infant and child death rates • Number of low-birth weight babies • Teen pregnancy rates • Number / percentage of women receiving prenatal healthcare • Immunization rates among school children • Prevalent health problems • Communicable diseases • Air and water quality				

Nutrition Needs of Eligible Families				
• Number / percentage of children receiving free lunch and breakfast • Number / percentage of food stamp recipients • Number / percentage who participate in Women, Infants and Children (WIC) program participants				

• Number / percentage who participate in food distribution programs • Availability of low-cost food				
Housing and Homelessness				
• Overcrowding/availability • Affordability • Conditions • HUD housing • Utilities • Homeless count • Mobility • Other prevalent social or economic factors				
Child Care Availability				
• Number of child development centers, child care centers, and family child care programs, including home visiting, publicly funded state and local preschool programs • Approximate number of Head Start-eligible children served in identified programs • Number or percent of working mothers • Typical work, school, or training schedules				
Transportation and Communication				
• Vehicle ownership • Relevant aspects of road conditions, climate, and weather relating to jobs, services, and isolation • Availability as in jobs, services, and isolation of public transportation services • Percentage of population with telephones/cell phones/ televisions/computers				
Resources available to address needs of eligible children and families				
• Social services and mental health services • Health, dental health, and nutrition resources • Disability services and resources				
Community Strengths				
• Positive community attributes				

Head Start ENROLLED Children and Families

- Recruitment area - Center location - Number and location of enrolled children - Ages of enrolled children - Tribal/racial/ethnic composition of enrolled children - Number of enrolled children who are DLLs - Attendance/waiting lists/over-income children - Parent involvement and recruitment experience - Number of foster children enrolled - Number of homeless children enrolled - Number of enrolled children with disabilities - Types of disabilities (by diagnostic category) of enrolled children - Resources provided to enrolled children with disabilities by other agencies				

Head Start Staff

- Racial, ethnic, tribal composition - Languages spoken - Educational attainment				

Relevant Opinions of Community Needs

- Opinions of parents - Prevalent community problems - Knowledge of existing resources - Accessibility of available resources - Adequacy of services provided by existing resources - Additional resources needed - Opinions of community leaders/institutions - Prevalent community problems - Knowledge of existing resources - Accessibility of available resources - Adequacy of services provided by existing resources - Suggestions for improving services - Additional resources needed - Opinions of Head Start staff				

• Prevalent community problems • Knowledge of existing resources • Accessibility of available resources • Adequacy of services provided by existing resources • Suggestions for improving services • Additional resources needed				

Community Assessment Annual Update
The Head Start Program Performance Standards require programs to review and update the community assessment annually to reflect any significant changes including increased availability of publicly-funded pre-kindergarten (including an assessment of how the pre-kindergarten available in the community meets the needs of the parents and children served by the program, and whether it is offered full school day), rates of family and child homelessness, and significant shifts in community demographics and resources. Determining community strengths, needs, and resources, 45 CFR §1302.11(b)(2) Subpart A.

Source: Adapted from AIAN Region QIC Resource

ADMINISTRATION FOR
CHILDREN & FAMILIES

NATIONAL CENTER ON
Program Management and Fiscal Operations

Early Childhood
National Centers

pmfo@ecetta.info • https://eclkc.ohs.acf.hhs.gov/ncpmfo • Tel: 888-874-5469

Enrollment Reduction and Conversion Considerations

This resource supplements ACF-IM-HS-22-09 and outlines critical questions and data to consider as part of the planning and development for both enrollment reduction and conversion requests.

> **Enrollment Reduction**
> Sect. 640(g)(3) / ACF-IM-HS-22-09
> Reduce funded enrollment slots without a reduction in program operations funding.
>
> **Conversion**
> Sect. 645(a)(5) / 45 CFR §1302.20(c) / ACF-IM-HS-22-09
> Existing Head Start slots converted into Early Head Start slots, which includes an enrollment reduction in the number of Head Start slots and an increase in the number of Early Head Start slots.

All change in scope requests must be submitted, at a minimum, 90 days before planned implementation. The application is submitted via the Head Start Enterprise System (HSES) as a change in scope, either within a baseline or continuation application, or as an Amendment: change in scope. The application must include the following documents:

- SF-424
- SF-424A
- Governing board and Policy Council approvals
- Program narrative
- Budget narrative
- Proposed program schedule
- Supporting documents

In instances where both an enrollment reduction and conversion are requested, the enrollment reduction must be determined first. Then, the data from the reduction (e.g., cost per child, budget, funded slots, etc.) are used to determine the conversion.

When considering a change in scope to reduce enrollment or to convert slots from Head Start to Early Head Start, various factors must be taken into account. This resource outlines critical questions and data to consider as part of the planning and development for both

enrollment reduction and conversion requests, as well as considerations that are specific to each. Please know multiple conversations with your program specialist may be needed during the planning, requesting, and implementation of the enrollment reduction and/or conversion.

Enrollment Reductions or Conversions

Please address each of the sections below in your change of scope request.

Justification

Questions to address:

- What is the primary justification for the enrollment reduction or conversion?
- What are the current enrollment levels for Head Start and Early Head Start programs?
- Is the program currently underenrolled or participating in the Full Enrollment Initiative (FEI)?
    - For programs in the FEI (Full Enrollment Initiative), if an enrollment reduction or conversion is identified as part of a program's corrective action plan, please explain how the proposed changes are sustainable.
- How many Head Start and Early Head Start slots are proposed to be reduced or converted?
- What is the program's expected outcome or goal?
- Are the proposed amounts of slots and funding adequate for the intended purpose?
- Is the proposed change in scope sustainable?

Data Considerations for Change in Scope Requests

Programs should review the following data to justify their request:

- Community Assessment results – a community assessment must be conducted at least once over the five-year project period. It describes community strengths, needs, and resources and ensures the program remains responsive to the needs of the children and families they serve. A review and update of the community assessment to reflect any significant changes must be conducted annually. (45 CFR §1302.11(b)(1-2))
    - Key data include:
        - Needs of currently enrolled families
        - Other community risk factors
        - Population of children 0–3 and 3–5 vs. Head Start-eligible children 0–3 and 3–5
        - Availability of slots in community early childhood programming (e.g., Head Start and Early Head Start programs, child care, local schools, etc.)

- Self-assessment results – the recipient must consult their most recent annual self-assessment to make sure their internal systems will support their proposed request. ([45 CFR §1302.102(b)(2)](#))
- Waitlist data
- Wage comparability study (within the last three years)
    - Alignment of staff qualifications to comparable industries, including elementary schools
    - Wage compression
- Input from Policy Council and board of directors

Equity Considerations

Programs should consider the following racial/ethnic groups and historically marginalized populations when addressing the questions below:

- Black, Latino, Indigenous and Native American, Asian Americans and Pacific Islanders, and other people of color
- Children experiencing homelessness
- Children in foster or kinship care
- Children with disabilities
- Children who are dual language learners

Questions to consider:

- Are all racial/ethnic groups and historically marginalized populations who will be affected by this enrollment reduction or conversion included in the decision-making process?
- How will this enrollment reduction or conversion:
    - Affect each group and population?
    - Be perceived by each group and population?
- Will the enrollment reduction or conversion worsen, ignore, or exacerbate existing disparities? How?
- What is being done to guarantee the outcomes of this enrollment reduction or conversion will not result in disproportionate slot loss for certain groups and populations?

Administrative and Supervisory Structure

How will the proposed enrollment reduction or conversion impact non-program staff? Please use the questions below to assist in the planning and development of the request:

- Are the percentages of non-program staff salaries charged to Head Start and Early Head Start grants still reasonable given the proposed adjustments to the program?
- Is there administrative cost that can be reduced?

- Have changes been considered or made to the organizational structure as a result of the enrollment reduction or conversion, and are they reasonable and necessary?

How will the proposed enrollment reduction or conversion impact supervisory staff? Please use the questions below to assist in the planning and development of the request:

- Are supervisory positions reasonable and necessary based on the proposed enrollment reduction or conversion?
- What is the justification for keeping or eliminating supervisory positions?

Budget Considerations

The budget and budget narrative should explain all changes as a result of the proposed Head Start or Early Head Start enrollment reduction or conversion. Cost savings associated with serving fewer children must include a description by line item within each object class category. The repurposed use of funds must include a description by line item within each object class category to support the primary reason for the request. It is critical that the budget is built based on need, sustainability, and the ability to provide high-quality services.

Consider the following questions and collaborate with fiscal officers and federal grants management specialists during the budget consideration process to achieve your intended outcome:

- Is the full amount of ongoing funding necessary?
- Has consideration been given to potential cost savings and reinvestment in planning all areas of the budget?
  - Staffing and personnel — is the current staffing pattern necessary and adequate?
  - Fringe benefits
  - Equipment
  - Contracted services (e.g., data system, payroll, health and mental health, etc.)
  - Transportation
  - Facilities (e.g., rent, utilities, insurance)
  - Maintenance
  - Supplies (e.g., office, educational, food service, diapers, formula)
  - Out-of-town and local travel
  - Indirect costs
  - Administrative costs
  - Other
- Are there opportunities to reduce costs by outsourcing services?
- Has the current cost allocation plan been reviewed and evaluated to determine how the proposed enrollment reduction or conversion request impacts the plan?

- Unobligated funds must be used within the project period with proper planning. A budget revision request may be necessary depending on the purpose for which the funds were originally approved. Are there unspent funds from a previous budget year that can be carried over and used to support any one-time costs associated with the enrollment reduction or conversion request?
- Are there one-time costs associated with the request?
    - If yes, how does the recipient propose to pay for any one-time expenses?
    - If one-time funds are coming from an external source, what is the backup plan if such funds are delayed or eliminated?

Governing Bodies and Policy Council

The board of directors, Tribal Council, and Policy Council should be involved in the discussion and approval of an enrollment reduction or conversion. Meeting minutes, along with a signed statement from the chairpersons that reflects their participation in and approval of the request, is required.

Enrollment Reductions

Please address each of the sections below in your change of scope enrollment reduction request.

Planning and Staffing

Questions to address:

- What is the proposed timeline for implementation?
    - Timeframes should occur with the least amount of disruption to children and families
- Will currently enrolled children and families be displaced?
    - Develop and describe the transition plan
    - How will transitioning families to alternate program options or sites be supported?
- What impact does the proposed reduction have on staffing?
    - Describe changes to the staffing plan
    - Review the impact to the organizational chart and management structure
    - Consider staff qualifications and certifications that may be required
    - Impacts to the coaching plan
    - Family service staff caseloads
- Have updates to the selection criteria that reflect the needs of the community been considered?
- What is the availability of space and facilities within the community?

Programming

Questions to address:

- Do the current service delivery models meet the needs of the community? If not, what models or changes are under consideration?
    - Program options
    - Center locations
    - Days and times of Head Start and Early Head Start services
- Does community and program data support the addition or elimination of program options?

Please ensure the proposed program design is in compliance with the Head Start Program Performance Standards (HSPPS) duration requirements (Program Structure, 45 CFR §1302 Subpart B):

- At a minimum, the request should include a proposed program schedule
- Comparison of the before and after program schedules is needed to avoid shortening the number of hours of planned classroom activities
    - If the planned classroom hours are shortened, a justification of how that best meet the needs of the community and enrolled families must be given
- Recipients who received duration funding in the past must ensure the proposed enrollment reduction does not reduce the hours of planned classroom activities or eliminate slots supported by duration funding

Conversions

Please address each of the sections below in your change of scope conversion request.

Planning and Staffing

Questions to address:

- What is the proposed timeline for implementation?
    - The timeline should pose the least disruption to children and families
    - Are the submission and implementation dates reasonable and realistic?
    - Is there a backup plan if there is a delay in the implementation of the proposal (e.g., indoor or outdoor renovations, staff hiring, supplies, etc.)?
- Will currently enrolled Head Start children and families be displaced?
    - Develop and describe the transition plan
    - How will transitioning families to alternate program options or sites be supported?

- Does the program plan to serve pregnant women?
    - After the proposed conversion, will there be enough EHS (Early Head Start) slots to support newly born children?
    - After the proposed conversion, will there be enough Head Start slots to support children aging out of EHS (Early Head Start)?
    - If the program is not directly serving pregnant people, consider what community resources are in place to serve this population
- Consider the following for Head Start classrooms redesignated as EHS (Early Head Start) classrooms:
    - Indoor and outdoor spaces, including outdoor shading areas
    - Supplies and materials
    - Staffing patterns and qualifications
    - State licensing requirements, and timeframe for relicensing if applicable
- What impact does the proposed conversion have on staffing?
    - Staffing plan
    - Qualifications – are Head Start teachers trained to teach EHS (Early Head Start) classrooms?
    - Coaching plan
    - Training plan
    - Organizational chart and management structure review
    - Family service staff caseloads

Programming

Questions to address:

- Do the current service delivery models meet the needs of the community? If not, what models does the community and program data identify as a need?
    - Program options
    - Center locations
    - Dates and times of Head Start and Early Head Start services
- Do community and program data support the addition or elimination of program options?

- Please ensure the proposed program design is in compliance with the HSPPS (Head Start Program Performance Standards) duration standards ([Program Structure, 45 CFR §1302 Subpart B](#)):
  - At a minimum, the request should include a proposed program schedule.
  - Comparison of the before and after program schedules is needed to avoid shortening the number of hours of planned classroom activities.
    - If the planned classroom hours are shortened, a justification of how that best meet the needs of the community and enrolled families must be given.
  - Recipients who received duration funding in the past must ensure the proposed enrollment reduction does not reduce the hours of planned classroom activities or eliminate slots supported by duration funding.
- Do the current curricula, assessment, and screening tools meet the HSPPS (Head Start Program Performance Standards) requirements and support school readiness goals?
- Are EHS (Early Head Start) services currently being provided? If not, the following items should be considered and addressed:
  - Researched-based and developmentally appropriate curriculum implementation
  - Assessment tools and timeframes
  - Developmental screening tools
  - School readiness goals
  - Training and technical assistance support
  - Community partnerships that serve this special population (e.g., medical and dental doctors)
- Does the request include all items outlined in [Determining program structure, 45 CFR §1302.20(c)(3)](#)?

Read more:

[Program Planning](#)

Last Updated: November 7, 2022

	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
ACF Administration for Children and Families	1. Log No. ACF-IM-HS-22-04	2. Issuance Date: 06/21/2022
	3. Originating Office: Office of Head Start	
	4. Key Words: Head Start Workforce; Financial Incentives; Recruitment and Retention; Bonuses	

INFORMATION MEMORANDUM

TO: All Head Start and Early Head Start Grant Recipients

SUBJECT: Competitive Bonuses for the Head Start Workforce

INFORMATION:
Head Start staff are the backbone of our programs. Every day, staff work tirelessly to provide high-quality Head Start services to children and families. During very challenging times, Head Start staff have continued to ensure children and families have the support they need to thrive.

Adult wellness is vital in any workforce; particularly in Head Start programs where children and families in the most vulnerable circumstances are served. Providing comprehensive services through a whole family approach requires staff to be well-versed in the tenets of early childhood education and development. It also requires a level of clear-headedness and physical stamina that must be supported with a systemic approach. This approach should, at its core, value the important role of everyone in the Head Start workforce and recognize that they deserve appropriate compensation (i.e., wages and benefits) to fulfill their important charge. Indeed, a stable, qualified workforce is critical for programs to keep their classrooms open and maintain their funded enrollment. This cannot be accomplished if the workforce continues to be undervalued and undercompensated.

The Office of Head Start (OHS) recognizes that the dedication of Head Start staff is especially commendable given persistently low wages and lack of comprehensive benefits, particularly for education and family services staff. Permanent, sustainable wage increases require additional funding. This is often done by freeing up funds within existing budgets — a long-term program planning activity that often involves making difficult decisions — or through additional appropriations from Congress. In the meantime, OHS recognizes programs are seeking strategies to provide immediate relief to current staff, as well as ways to fill vacant positions as they begin to plan for the next program year.

This Information Memorandum (IM) describes providing competitive financial incentives with existing grant funds as a short-term strategy (45 CFR §75.430(f)) to invest in the Head Start workforce and promote retention of current staff, as well as recruitment of new staff to fill vacant positions. OHS strongly encourages all Head Start programs to use American Rescue Plan (ARP) funds, base grant operations funds, and other COVID-19 relief funds to offer competitive financial incentives to staff, such as retention and hiring bonuses, to help stabilize and support

their workforce in the near term.[1] Please be mindful of any applicable grant requirements that must be met, including period of availability for different funding sources (e.g., March 31, 2023, for ARP funds).

OHS encourages programs, including those who have already offered such incentives, to reevaluate the monetary size of incentives that are necessary and reasonable to retain and recruit staff. These may be larger than previously considered. Below are strategies programs can use when determining and justifying the necessity and reasonableness for larger incentives. Programs are encouraged to apply these strategies for staff positions in their program that are impacted by the workforce shortage.

Competitive Financial Incentives

Challenges to maintaining a qualified workforce are not unique to Head Start programs. Employers in many industries are currently struggling to retain and hire staff. Financial incentives can be a powerful tool to promote retention and recruitment, particularly for positions that are difficult to fill or experiencing high turnover. Many employers are appealing to workers by offering financial incentives, such as retention and hiring bonuses. These incentives vary widely both in size and distribution schedule.

Head Start programs are competing with other employers, such as public schools, for qualified staff. OHS strongly encourages programs to offer financial incentives that are substantial enough to compete with incentives and overall compensation rates offered by competitor employers in their local job market, including elementary schools, while understanding that such financial incentives are not permanent wage increases. Programs may match or reasonably exceed offers made by competing employers, including elementary schools. The amount of such financial incentives may be larger than programs have offered in the past. As outlined in ACF-IM-HS-21-01, what is a reasonable cost during the ongoing COVID-19 pandemic and the heightened workforce needs likely looks different than what was reasonable during pre-pandemic times.

Justification for Financial Incentives: Determining Necessity and Reasonableness

When making data-informed programmatic decisions on financial incentives and determining necessity and reasonableness, programs can consider the following.

1. **Competing employers can include public school settings.**
   - A program may consider bonuses and overall compensation rates being offered by local elementary school settings for positions that are comparable to the Head Start position for which the incentive is being provided (e.g., a Head Start preschool teacher provides comparable services to a kindergarten or first grade teacher).
   - Programs may consider bonuses and compensation rates being offered in neighboring counties or school districts.

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[1] Since monetary bonuses likely count as income, grant recipients should understand income requirements for public benefits to determine how such bonuses may impact staff members' access to these benefits.

- These data points can be integrated into a program's wage comparability study as one key approach to using data to document workforce strengths and needs.

2. **OHS strongly encourages programs to structure incentives in a way that rewards retention of existing staff**.
   - Think about scaling incentives based on employee tenure with the program.
   - Consider the implications of different incentive payment structures or schedules. For instance:
     - A single lump sum payment may be particularly impactful for Head Start staff who have an established tenure with the program.
     - OHS suggests programs stagger any hiring bonuses for new and prospective staff over time to promote retention, rather than providing one lump sum upon hire. For example, a hiring bonus may be advertised for a position posting as one large amount, with part of the bonus paid upon beginning employment with the program and subsequent portions dispersed in one or more increments at future points in time as the new employee remains in their position (e.g., six months after hire; one year after hire; etc.).

3. **Programs should use data on the extent of their workforce shortage and program needs to demonstrate the necessity and reasonableness for competitive incentives**.
   - Relevant data can include the number of vacancies by type of position, how often vacancies occur, how long posted vacancies remain unfilled, the number of applicants, the number of applicants who are offered or attend interviews, the number of candidates accepting new positions, the length of time new hires remain employed in the program, and data from exit and stay surveys.
   - Programs can highlight how a staffing shortage prohibits them from reaching full in-person enrollment as a demonstration of necessity.
   - If a program already offers financial incentives and continues to struggle to maintain their workforce, this may be an indicator to increase incentive amounts to make them more competitive.

4. **Any incentives for staff are subject to an established written policy of the grant recipient for allowability** (45 CFR §75.430(f); 45 CFR §75.431; 45 CFR §1302.90(a)). OHS reminds programs to update their written policies and procedures with governing board approval to reflect more competitive staff incentives prior to implementation.

5. **Financial incentives may complement, but should not replace, intentional workforce planning practices.** Financial incentives, particularly those that use ARP funds, are a short-term strategy to recruit and retain staff. Programs should continue to use intentional workforce planning practices to build and sustain a stable workforce.

OHS recognizes that the availability and size of any financial incentives will depend on many local factors, including cost of living and the local job market. Programs should contact their Regional Office with any questions about this IM and providing financial incentives.

Thank you for the work you do on behalf of children and families.

/ Katie Hamm /

Katie Hamm
Acting Director, Office of Head Start
Deputy Assistant Secretary for Early Childhood Development

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-IM-HS-22-06	2. Issuance Date: 09/12/2022
	3. Originating Office: Office of Head Start	
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INFORMATION MEMORANDUM

TO: All Head Start and Early Head Start Grant Recipients

SUBJECT: Strategies to Stabilize the Head Start Workforce

INFORMATION:

The federal Head Start program is a nationally recognized leader in the field of early childhood education for providing innovative, high-quality services to the children and families who will most benefit from early education and comprehensive services. In this memo, "Head Start" refers to Head Start, Early Head Start, Migrant and Seasonal Head Start, and American Indian and Alaska Native Head Start programs, services, and staff, unless otherwise specified. The credentials and qualifications of Head Start staff have significantly increased over the past decade, while their compensation has been persistently low. Stagnant wages and lack of comprehensive benefits and wellness supports make it difficult to recruit and retain staff, which contributes to classroom closures and high caseloads for current staff. A well-compensated and supported workforce is essential to providing high-quality services to promote children's optimal development and family well-being. The Office of Head Start (OHS) draws upon the legacy of Head Start leadership in the early childhood field to encourage programs to appropriately compensate and support their staff.

Head Start staff are deeply committed to the mission of the program and are highly qualified professionals. OHS encourages programs to look holistically at their organizational structure and identify sustainable ways to support and compensate staff accordingly. As needed, OHS encourages grant recipients to consider restructuring their programs as a sustainable mechanism for providing increased compensation and other necessary supports to staff. This requires a balance of effectively providing high-quality, comprehensive services to the highest need children and families while improving staff compensation and supports. This may include consolidating grants, restructuring management or organizations, or requesting a reduction in the overall number of funded slots while continuing to prioritize services to the children and families who are most in need.

During this process, we encourage programs to consider equity issues in pay and benefits for staff. Research shows that, like other fields, there are ethnic and racial pay disparities in early childhood education. We understand these are difficult decisions that will take time and careful consideration of local wages, cost of living, data on current enrollment and staffing, and other relevant information.

If a program requests an enrollment reduction to increase staff compensation, the request should focus on those positions for which staffing challenges are most pressing and are impeding the program from fully serving children and families. We encourage programs to take the time needed to make such decisions through thoughtful, data-informed strategic planning, while not reducing the quality of services for children and families. All enrollment reduction requests must be submitted via the Head Start Enterprise System (HSES). Regional Offices will carefully review each request to determine whether it can be approved.

This Information Memorandum (IM) highlights strategies to support the Head Start workforce that grant recipients can begin working toward immediately.

Increase Compensation and Financial Supports for Head Start Staff

Permanently Increase Compensation

OHS strongly encourages Head Start grant recipients to permanently increase compensation, which is the most effective strategy in retaining and recruiting qualified staff. When considering an increase in staff compensation, OHS encourages programs to use findings from their wage comparability study to help support their decisions. Programs can consider elementary school settings for purposes of wage comparability, including neighboring school districts. OHS also urges programs to consider benefits that might be critical to recruit and retain a qualified, diverse workforce — such as health care, retirement, and paid leave benefits — and compete with other employers providing comparable services in their local job market. Additionally, the Financial Essential Series may help programs in restructuring existing budgets to align with program goals and support high-quality program services.

Offer Bonuses, Short-term Pay Increases, or Other Financial Incentives

As detailed in ACF-IM-HS-22-04 Competitive Bonuses for the Head Start Workforce, programs can use American Rescue Plan (ARP), other COVID-19 relief, or base grant funds to provide retention bonuses, hiring bonuses, or other financial incentives to staff to support their workforce in the short-term. OHS encourages programs to prioritize bonuses or incentives for staff who have an established tenure with the program, and to consider distributing any hiring bonuses out over time rather than in one lump sum. OHS also strongly urges programs to use their own data on the workforce to determine for which positions bonuses might be most impactful. OHS reminds programs that any bonuses or incentives for staff must be incorporated into their personnel policies and procedures approved by the governing body and Policy Council or policy committee. Since monetary bonuses likely count as income, grant recipients should understand income requirements for public benefits to determine how such bonuses may impact staff members' access to these benefits.

At their discretion, programs can decide to require a service commitment as a condition of receiving a bonus or financial incentive. However, any service requirement is solely the responsibility of the grant recipient to establish, implement, and enforce as they see fit.

Compensate Staff During Closures and Transitions

OHS reminds programs that when centers are closed or in-person home visits are temporarily suspended due to a disaster, they can continue to provide compensation for up to two weeks to those staff who are unable to engage in employment activities as described in [ACF-IM-HS-19-01](#). Programs also may continue to pay health insurance premiums for up to 90 days for staff subject to furlough, such as during a summer break ([ACF-IM-HS-21-02](#)).

Public Service Loan Forgiveness (PSLF)

Programs can provide information to their staff about federal programs that could help make student loans easier to pay back and lead toward loan forgiveness, such as the [PSLF program](#). The Department of Education is offering a [time-limited waiver for PSLF](#) so borrowers can count additional payments toward forgiveness. Watch this [webinar](#) for additional information. The waiver expires October 31, 2022. After that, normal PSLF rules will be in effect. Staff who wish to take advantage of the time-limited changes are encouraged to apply for PSLF as soon as possible to ensure they complete the required paperwork prior to the deadline.

Additional Supports and Flexibilities for the Head Start Workforce

Promoting a Positive and Empowering Work Environment

A healthy and supportive work environment is critical for recruiting and retaining staff, as well as providing high-quality services to children and families. Programs are encouraged to consider strategies to promote the mental health and well-being of their workforce. This may include providing staff with regularly scheduled breaks, brief unscheduled wellness breaks, reflective supervision, and access to employee assistance programs. These and other strategies are described in [ACF-IM-HS-21-05 Supporting the Wellness of All Staff in the Head Start Workforce](#).

Additionally, programs can consider how personnel management could be improved to foster a satisfying and engaging work environment, including through:

- Effective communication and feedback with staff (e.g., two-way instead of top-down)
- Improved orientation or onboarding practices
- Clear personnel policies and procedures
- Ample professional development, coaching, and mentoring opportunities that value the work staff perform and help them improve and move forward in their careers

Recognizing Head Start staff as professionals, inviting innovative practices and ideas, and including staff input in the program's plans and operation contributes to job satisfaction and employee retention.

Supports for Educational Attainment and Career Advancement

Head Start programs have a unique opportunity to invest in their communities by supporting the career development of their staff. Programs may advertise and encourage existing staff to use educational benefits, such as tuition and fee support, and opportunities for career growth that are associated with increased educational attainment.

Apprenticeship programs are a strategy to support educational growth and provide consistent pools of staff. Apprenticeship models recruit people who have interest and talent in working in early childhood settings and support them in obtaining required credentials and employment with Head Start programs. This includes, for example, starting as paid substitutes, floaters, or bus monitors, and then moving into other positions as they obtain required degrees or credentials. Increases in compensation typically accompany increases in qualifications and responsibilities. Watch this webinar for resources on how to build and execute a successful registered apprenticeship program. Grants to support apprenticeship programs are often available from the U.S. Department of Labor.

Programs can also create partnerships with high schools, community colleges, and other higher education institutions that are available to multiple staff and designed to promote successful completion of degree or credential requirements (e.g., courses offered at times that accommodate full-time workers or taught in non-English languages). Further, creating cohorts of staff enrolled in the same education or credentialing program can facilitate shared support systems.

Costs associated with supporting educational attainment and development of career pathways for staff, such as tuition and fees for obtaining a degree or credential or costs associated with developing an apprenticeship program, can be paid for using Head Start base grant, ARP, or other COVID-19 relief funds. If a program uses funds from the Coronavirus Relief and Response Supplemental Appropriations or Coronavirus Aid, Relief, and Economic Security Acts, they must document and justify that the expense is directly supporting their response to the COVID-19 pandemic.

Qualification Waiver for Head Start Preschool Teachers

A program that has attempted unsuccessfully to recruit a qualified teacher for a Head Start preschool classroom may submit to their Regional Office a request for a waiver of up to three years for the position's qualification requirements (Sec. 648A(a)(4)(B)). To be considered for the waiver, the program must demonstrate that the Head Start preschool teacher is 1) enrolled in a program that grants a qualifying degree and such degree will be completed in a reasonable time not to exceed three years; and 2) has at least a current center-based preschool Child Development Associate® (CDA) credential or a state-awarded certificate that meets or exceeds the CDA credential.

As outlined in the Head Start Act, a qualifying degree includes an associate or bachelor's degree in early childhood education, or in a related field with coursework equivalent to an early childhood education major along with experience teaching preschool-age children. A waiver request must also adequately describe how the program's attempts to recruit qualified individuals were unsuccessful. The Regional Office will review each waiver request and determine whether to grant the waiver. Programs could consider using the waiver process to promote a strong assistant teacher to a lead teacher role, ensuring that teacher will receive the necessary degree in a reasonable timeframe as described above.

OHS will continue to work with programs as they support a strong, qualified workforce that is highly valued, healthy, and committed to the Head Start mission. Please direct any questions about the content of this IM to your OHS Regional Office.

Thank you for all you do on behalf of children and families.

Sincerely,

/ Katie Hamm /

Katie Hamm
Acting Director
Office of Head Start