

ENROLLMENT REDUCTION AND HS/EHS SLOT 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 and HS/EHS Slot Conversion Considerations

Enrollment Reduction: Reduce funded enrollment slots without a reduction in program operations funding. (Sect. 640(g)(3) / ACF-IM-HS-22-09)

Conversion: 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. (Sect. 645(a)(5)/ 45 CFR §1302.20(c) / ACF-IM-HS-22-09)

The Office of Head Start (OHS) recognizes that community needs shift over time for various reasons. The Head Start Act includes several provisions for reducing or converting slots to better meet community needs. (Sec 640(g)(3), Sec 645(a)(5), and Sec 640(f)(2)). The Act also offers special provisions for AIAN grantees. Sec. 645(d)(3) of the Head Start Act states: Notwithstanding any other provision of this Act, an Indian tribe or tribes that operates both an Early Head Start program under section 645A and a Head Start program may, at its discretion, at any time during the grant period involved, reallocate funds between the Early Head Start program and the Head Start program in order to address fluctuations in client populations, including pregnant women and children from birth to compulsory school age. The reallocation of such funds between programs by an Indian tribe or tribes during a year shall not serve as the basis for the Secretary to reduce a base grant (as defined in section 640(a)(7)) for either program in succeeding years.

ACF-PI-HS-14-02 asks any AIAN grantee that exercises its discretion to reallocate funds to notify its OHS Regional Office prior to the effective date of such reallocation.

HOW TO SUBMIT A CHANGE IN SCOPE REQUEST

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, 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

Please use the questions below to assist in the planning and development of the request:

How will the proposed enrollment reduction or conversion impact non-program staff?

- 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?

- 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 slots to support newly born children?
- After the proposed conversion, will there be enough Head Start slots to support children aging out of EHS?
- 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 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 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 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 requirements and support school readiness goals?

Are EHS 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)?