Crosswalk of Standards and Policies on Full-Day Head Start

Current Head Start Performance Standards
http://eclkc.ohs.acf.hhs.gov/hslc/standards/

Notice of Proposed Rulemaking on Standards
http://eclkc.ohs.acf.hhs.gov/hslc/standards/hpps/nprm

NHSA Comments on the NPRM
http://www.nhsa.org/performance-standards-nprm

Program Instruction
April 2016
http://eclkc.ohs.acf.hhs.gov/hslc/grants/duration

Final Rule on Standards
Expected Summer 2016

§ 1306.32 Center-based program option.
(b) Class- or program option requirements.
(1) Classes must operate for four or five days per week or some combination of four and five days per week.
(2) Classes must operate for a minimum of three and one-half to a maximum of six hours per day with four hours being optimal.
(3) The annual number of required days of planned class operations (days when children are scheduled to attend) is determined by the number of days per week each program operates. Programs that operate for four days per week must provide at least 128 days per year of planned class operations. Programs that operate for five days per week must provide at least 160 days per year of planned class operations. All center-based program options must provide a minimum of 32 weeks of scheduled days of class operations over an eight or nine month period.
(6) Head Start grantees operating migrant programs are not subject to the requirement for a minimum number of planned days, but must make every effort to provide as many days of service as possible to each migrant child and family.
(d) Full day variation.
(1) A Head Start grantee implementing a center-based program option may operate a full day variation and provide more than six hours of class operations per day using Head Start funds.
(2) Programs are encouraged to meet the needs of Head Start families for full day services by securing funds from other agencies. Before implementing a full day variation of a center-based option, a Head Start grantee should demonstrate that alternative enrollment opportunities or funding from non-Head Start sources are not available for Head Start families needing full-day services.
(3) Head Start grantees may provide full day services only to those children and families with special needs that justify full day services or to those children whose parents are employed or in job training with no caregiver present in the home. The records of each child receiving services for more than six hours per day must show how each child meets the criteria stated above.

§ 1302.20 In general.
...The program option(s) chosen must meet the needs of children and families based on the community assessment described in §1302.11(b). Existing programs must annually consider whether they would better meet local needs through conversion of existing part-day slots to full-day or full-working day slots, extending services to a full calendar year, or conversion of existing preschool slots to Early Head Start slots as described in paragraph (c) of this section.

§ 1302.21 Center-based option.
(a) Setting. The center-based option provides education and early childhood development services to children primarily in classroom settings.
(c) Service—(1) Days per year. At a minimum, a program that serves preschool age children must offer no less than 180 days of planned operation per year, and Early Head Start programs must offer no less than 230 days of planned operation per year. A program must:
(i) Plan their year using a reasonable estimate of the number of days during a year that classes may be closed due to problems such as inclement weather, based on their experience in previous years; and,
(ii) Make every effort to schedule makeup days using existing resources if days of planned operation fall below the number required per year.
(2) Exemption for Migrant or Seasonal Head Start programs. A Migrant or Seasonal program is not subject to the requirement for a minimum number of days of planned operation per year, but must make every effort to provide as many days of service as possible to each child and family.
(3) Hours per day. A program must offer a minimum of six hours of operation per day but is encouraged to offer longer service days if it meets the needs of children and families.

Without additional funding and flexibility, expanding access to full-day, full-school-year preschool will be unduly disruptive to many communities...Without additional funding, the NPRM estimates the total cost of implementing all changes would lead to 126,448 less children being served and 9,432 teachers' jobs being lost; most of these losses would be driven by the cost of expanding access to full-day, full-school-year services.

NHSA appreciates the early childhood research described in the NPRM that shows that children benefit from increased learning opportunities and strength of programming for offering extensive services to all vulnerable children. However, the new limitations on program design in the NPRM would cause significant disruption to many communities, eliminating access for over one hundred thousand families and reducing the ability of communities to design services based on local resources and needs.

Many programs already blend funding streams with pre-K or child care so that some slots are six or more hours – and these blended options should be clearly allowable in the Standards – but in other communities, pre-K partnerships involve a mix of Head Start and pre-K funded children in the same part-day classroom. All of these partnerships would be immediately disrupted by the full-day requirement, potentially forcing Head Start to lose access to facilities and reducing mixed-income settings. Additionally, relationships with child care providers are also jeopardized by this proposal, as lengthening the Head Start day limits the hours child care providers can offer for before- and after-care, and in turn affects their willingness and ability to serve Head Start families.

While expanding access to full-day Head Start is an important goal, resources are critical and the NPRM changes will do lasting damage to relationships and quality of programming across the country.

Recommendation: NHSA recommends that full-day be one option that programs are encouraged to consider as they make local decisions about program design. NHSA further recommends that programs be allowed to align their calendars with partner LEAs or offer a minimum of 1,020 hours for Head Start, distributed across days as best meets local need.

The purpose of this funding is to provide access to full school year and full school day programming in all Head Start communities, and continuous services for all Early Head Start families, by supporting grantees in extending the program day and/or year for more children.

These funds can be used to support a myriad of center-based program models with varying hours per day and days per year, as long as the program provides services for 1,020 hours of planned class operations over the course of a minimum of eight months per year for Head Start and 1,380 hours of planned class operations per year for Early Head Start...

The goal of these funds is to increase the proportion of a grantee’s Head Start center-based slots operating for 1,020 annual hours, Early Head Start center-based slots operating for 1,380 annual hours, and Head Start and Early Head Start family child care slots operating for 1,380 annual hours. Head Start grantees may apply for funding to increase the share of Head Start center-based slots that meet the 1,020 hours annual threshold to up to 40 percent of their center-based slots, though available funding may mean that the grantee will be awarded funding to increase service duration for a somewhat smaller share...

Head Start grantees that operate less than 40 percent of their center-based funded enrollment for a full school day and full school year schedule (1,020 hours of planned class operations over the course of a minimum of eight months per year) are eligible to apply. Applicants must propose to provide 1,020 annual hours of planned class operations for up to the number of slots needed to operate 40 percent of their Head Start center-based funded enrollment for this service duration... These funds may be used to convert Head Start slots from combination or locally designed program options to a center-based option and a full school day and full school year schedule.