

## More on How the NPRM Supports the Workforce

Director Khari Garvin: Hello! Warm greetings to everyone and thank you so much for joining us today for this webinar. My name is Khari Garvin, and I am the director of the Office of Head Start. I am thrilled to be here with my colleague Shawna Pinckney, who is the Associate Deputy Director of the Office of Head Start.

We will share a deeper dive into our recently proposed changes to the Head Start Program Performance Standards. I know many of you tuned in to our webinar last week where we announced that the Notice of Proposed Rulemaking, which is also known as an NPRM, was available to preview on the Federal Register. Starting today, you can submit your feedback about the NPRM on the Federal Register. The public comment period officially opens today and will remain open for the next 60 days. This means that the last day to submit your comments is January 19th, 2024.

Now, for today, Shawna and I are excited to build on our previous webinar and dive deeper into how our proposed changes would support the Head Start workforce. If you missed the webinar last week, it is currently available on the ECLKC website. It has more information on additional proposed policies that will not be covered in today's webinar.

All sounds good. The Head Start workforce is an essential part of what makes the Head Start program the gold standard early childhood program. Each and every person who works in a Head Start program contributes to Head Start delivery of high-quality services in important ways, helping to deliver on Head Start's mission to serve children and partner with families. Education staff support early learning and relationships that help children grow. Family services staff play the critical role of engaging and supporting families' goals for economic stability. Bus drivers, custodians, and kitchen staff are critical for providing safe transportation, clean learning environments, and nutritious foods for the children and families in our programs. Of course, none of this is possible without capable, consistent leadership that help build an engaging and positive work environment for all staff.

Over the years, Head Start children and families have benefited from staff earning better credentials and bringing more experience to program services, yet the compensation Head Start staff receive has simply not kept pace. Head Start programs share with us that they're losing staff to other employers, the food service and retail industries, as well as other education programs, for example, because these industries pay better or offer better benefits. Many staff who leave would rather stay in the Head Start program, but they just can't stay with the current levels of compensation. This is at the heart of why we have proposed changes to our standards, really to stabilize the Head Start workforce.

That starts with providing adequate compensation for the rewarding yet sometimes challenging work that they do. We have to make decisive action. We have to take decisive action right now to disrupt the status quo. Shawna?

Shawna Pinckney: We hear frequently from the field about the need to make meaningful structural changes to the Head Start program. So many of you have also emphasized the critical need to better support our Head Start workforce. Our proposals were informed by these

conversations. In addition, they were informed by program data, research, and policy experts in this field.

Here is just some of what we learned. Research tells us that strong, positive, and consistent relationships between young children and their educators provide a critical foundation for positive learning experiences and child development. We've heard from Head Start families just how disruptive it can be when a trusted staff member they've developed a strong relationship with leaves the program. Program staff also tell us that compensation is a big part of helping them feel valued in their work environment. We know compensation is far more than just wages. It's also about benefits and wellness and workplace culture. All of this comes together to support a robust and stable work environment.

Khari: This is all absolutely right, Shawna. Even if we just look at wages without any of the other parts of compensation, we can still see that Head Start teachers' wages in particular are just not up to par with their high qualifications and the high demands of their job. Our Head Start education staff are well qualified – make no mistake about that. For example, about 70% of our Head Start preschool teachers actually have a bachelor's degree, but the average wages these staff earn do not reflect those qualifications.

As you can see on this slide, our Head Start preschool teachers earn just under \$39,000 annually. This is far below the average salaries earned by kindergarten teachers and public-school preschool teachers. You want to know what's even more alarming? Head Start teacher salaries have barely kept up with the rising cost of living. Yet, for years, Head Start services have expanded and expectations of teachers have increased. Head Start cannot continue to make progress at the expense of fair pay for teachers. Let me say that again: We cannot continue to make progress at the expense of fair pay for teachers.

Altogether, this leads us to another concerning historical trend. Our data show that staff turnover at Head Start programs has steadily increased for a decade, and it is currently at the highest point in 20 years. Research tells us that low compensation and inadequate benefits are a major reason why teachers are leaving the field for higher-paying industries. Of course, teachers are not the only ones experiencing challenges. These types of trends of low pay and high turnover also apply to many other staff that help fill our programs with love and care. These alarming patterns are just not sustainable, and we need to take decisive action so that the next 10 years can look different.

Without a workforce at all levels that is stable, well compensated, and supported, Head Start is not able to fully meet its mission of preparing young children for school and for life. The proposals we are talking about today would reflect the extensive experience and qualifications and the value and importance of the critical work of Head Start staff. We must take this opportunity to make changes that will recruit and retain qualified staff at all levels of the program, allow children and families to form stable and consistent relationships with the staff they trust, and provide the highest quality services. Shawna?

Shawna: I completely agree. I want to make sure that everyone knows that the proposals we'll discuss today are just our best efforts to update the standards, but they are still proposals. Over the next 60 days, we will be relying on your feedback to help us get it right. After taking

additional time to review and consider your feedback, we'll put forth the final changes to our performance standards. In the meantime, our current Head Start performance standards absolutely remain in effect. Now, let's go through each of the proposed changes to support the workforce in more detail.

Khari: All right, let's get after it. If you joined us for our overview webinar last week, you already know that we are proposing four interrelated standards on staff wages, all of which are proposed to go into effect August of 2031 – again, August of 2031.

During our webinar today, we will go through each of these proposed standards for staff wages in more detail. We will begin with the proposed standard for the program's pay structure, or what we sometimes refer to as the wage ladder. The goal of this proposed standard is to promote competitive wages across all staff positions in the program. Shawna, can you give us a little bit more specifics about what we're proposing here?

Shawna: Certainly. The proposed wage standard requires programs to establish or update a pay structure for all staff, again as Khari stated, by August 2031. We certainly assume that most programs already have a pay structure and a wage salary and a salary scale – already have those things in place.

This proposed standard will require programs to take a look at that pay structure and ensure it considers staff responsibilities, qualification, experience, and hours worked when determining salaries for those positions. In other words, programs should review the salaries and wages they are paying to each position and how that compares with wages for similar jobs in the surrounding community. Programs should also consider the qualifications and experience of staff.

Some of you have heard the phrase, “A rising tide lifts all boats.” That's just what this standard is intended to do. We expect that updating the wage ladder will improve wages for a variety of staff positions that are also experiencing difficulties with recruitment and retention – for example, family service workers, bus drivers, custodians, kitchen staff, mid-level managers, and center directors. We want to avoid the unintended consequence of wage compression. So as programs consider how to restructure their wage ladders to improve significantly higher raises for education staff – and we're going to talk more about that in a moment – we expect that wages for all other staff positions will need to be lifted as well.

Khari: Appreciate that, Shawna. Look, we've discussed previously that these wage standards are proposed to go into effect – again, August of 2031. I know we've emphasized that several times, but we want to make sure we manage expectations around this proposed rule. Can you say just a little bit more about what we're proposing to ensure programs maintain competitive wages over time?

Shawna: Sure. Again, we propose that programs will review their pay structure, wage ladder, and that they'll do that at least once every five years to ensure it continues to promote competitive wages for staff. Our intention is for our grant recipients to be able to align this review with their pay structure and other planning and strategic activities that are also aligned with the five-year grant cycle.

Khari: Exciting, Shawna. Thanks again for that. I'm going to move us now. I do want us to now begin discussing a standard, which I am actually personally very proud of in this NPRM. The goal of this next standard that we'll talk about is for programs to make what we refer to as significant, measurable progress to pay parity for Head Start education staff with kindergarten through third grade teachers. Teachers in these elementary grades have similar responsibilities in supporting young children's learning and development, as do Head Start educators. In other words, they provide comparable services.

Both Head Start teachers and kindergarten through third grade teachers are providing education to children during their early childhood developmental stage, which happens from birth through age 8. Despite this fact, as we've already talked about at length, there is a substantial wage gap between our Head Start educators and elementary educators. Shawna, can you give just a little bit more about how we want programs to make progress to pay parity for Head Start education staff with kindergarten through third grade teachers?

Shawna: To achieve progress to parity, we propose that programs must – again, by August 2031 – that programs must ensure each member of their education staff is paid an annual salary that is at least comparable to the annual salary paid to public preschool teachers, and that those teachers be comparable in their local or neighboring school district. This standard serves as a progress marker towards ultimately achieving full pay parity for Head Start teachers with kindergarten through third grade teachers.

We believe the benchmark for annual salaries for public-school preschool teachers represents about 90% of the amount paid annually to kindergarten teachers for those with comparable qualifications. In this proposed standard, when we refer to education staff, what we mean is those staff who work directly with children in classrooms or homes as part of their daily responsibilities. This includes Head Start teachers, assistant teachers, home visitors, and family child care providers.

Khari: Love it. We think of this standard as one rung or one part of that wage ladder that we mentioned earlier today in this broadcast. Now, we fully expect that as programs make decisions about lifting wages for these education staff, the wages of other staff will also need to shift up as a result of that. We don't want to leave anyone out. We are asking programs to really think about and consider the salaries of public-school preschool teachers in the program's local or neighboring school district. We recognize that teachers and public schools that serve a high proportion of children living in poverty are often paid significantly lower, on average, compared to teachers in low poverty schools. In case teachers in the local school district are underpaid, we propose flexibility for programs to look at the salaries of preschool teachers in neighboring school districts as well and to use those as their salary marker for their Head Start educators if those neighboring school district salaries are higher than a program's local school district. Shawna?

Shawna: That's right. When determining the salaries for these staff we want programs to consider staff roles, responsibilities, qualifications, and experience. In general, we recognize that a staff member in a given position with a more advanced degree or credential is likely to be compensated more than someone in the same position with a lower degree or credential, all other factors if they were remaining equal.

However, we also recognize that other things besides qualifications also matter when it comes to high-quality services for children and families. Some of these things include experience. In early childhood education, many high-quality educators have many years of experience but may not have a bachelor's degree. In our proposed standards, they elevate the importance of considering experience in addition to qualifications when determining wages.

Khari: As we said earlier, I really do love – I love the entire NPRM – but I really do love this idea about pay parity and making sure that people are getting paid their worth as valued by the marketplace.

Now I'm channeling, I can sense there's some questions out there Shawna, so I'm going to put one on the table that I know that comes up quite often: What happens if a program is in an area where they don't have public preschool in their local – or even their neighboring – school district? What should those programs do to determine that anchor for staff salaries? What should they be benchmarking against?

Shawna: It's a really good question. If there's no public preschool in a program's local area, then we are proposing a standard that allows flexibility for programs to use an alternate method to determine comparable preschool salaries. But there's a caveat: This method must be approved by the Office of Head Start. An example of this method could be that a program might consider looking at salaries of a of public preschool teachers in a different area that is geographically or socioeconomically similar to their own service area. Or another example, a program could consider anchoring their education staff salaries to a specified percentage of kindergarten-to-third-grade teacher salaries in their school district – and again, if that alternative method has been approved by the Office of Head Start.

Khari: All right. That sounds good. I think that's pretty clear. Again, just ... We've said this, but I just want to make sure that we are all sharing the same understanding. Our proposed standard talks about measurable progress towards pay parity. Shawna, can you say just a bit more about that concept of measurable progress and what we mean by that?

Shawna: Sure. We propose to require programs to examine their progress to pay parity over time by regularly tracking data on how the salaries paid to their education staff compare to those paid to preschool to third grade teachers – again, in the local or neighboring school district. Our intention here is for programs to really be able to understand and demonstrate how they are closing these pay gaps over time. We want programs to capitalize on existing data sources as you track this and that. That could include strong relationships that many already have with their public schools.

Khari: Sounds good. I think there's a lot of positive reaction to all the emoticons that are being produced here as we're talking. That lets me know that people are understanding as we're describing and explaining the different aspects of the NPRM.

I want to shift us now to just ... We're still on wages, but I do want to emphasize the fact that our proposed wage standards address the minimum pay or the pay floor for staff in our programs. We think of this again as the first rung of the wage ladder. With this proposed standard, we are trying to lift the ladder from the bottom up. We're trying to move the entire

ladder and not just pieces of it. Can you share a little bit more detail about this specific one, Shawna?

Shawna: Reminding folks again about that target date of August 2031, the minimum pay for all staff must be at least sufficient to cover basic cost of living in the program's local geographic area. In most areas of the country, we assume that would be at least \$15 an hour. But we do recognize that in some areas of the country, \$15 per hour may not be sufficient and may need to be adjusted up to reflect higher cost of living.

When we refer to basic cost of living, we're referring to expenses, such as housing, food, utilities, medical costs, transportation, and taxes for the staff person. It's our intention with this standard that it would target those staff who currently receive the lowest wages in the program. These staff would include your aides, your floaters, office staff, custodial staff, cooks, bus monitors, etc.

Khari: All right, not leaving anybody out. This is good. Our final wage standard is wage comparability. Our intention – pardon me – here is to reflect the importance of the work that Early Head Start staff do and to ensure that pay increases are not only for preschool teachers, but for infant-toddler teachers as well as home visitors. Shawna, I know that came up in the chat here as one of the questions. We're not leaving anybody out, but what else can you tell us about this idea?

Shawna: For the last part of our wage standards, we want programs to ensure that wages are comparable across Head Start preschool and Early Head Start staff, and that that be comparable for those staff with similar qualifications and experience. We do want to emphasize that compensation should match an individual's experience and qualifications or their credentials. Head Start Preschool and Early Head Start staff perform similar important roles and responsibilities to support the development of enrolled infants, toddlers, and preschoolers. Unfortunately, despite this, our Early Head Start teachers are currently earning less on average than Head Start preschool teachers, even when they hold the same degree. This proposed standard will help to reinforce the importance of the work of our early Head Start staff and the work that they do every day for our infants and toddlers.

Khari: Love it. I love it, Shawna. By the way, I'm just going to pause and say that you are doing an exceptional job walking through the complexities of these proposed changes, so much so that I'm going to publicly go on record, right now, and I am going to give you Thursday of this week off – the entire day, by the way, whole day.

Shawna: Your generosity is just overwhelming.

Khari: You get the whole day off today because of the great job you're doing. I want you to keep up the good work as I now move us. OK? I'm going to move us now.

We're still talking about compensation, but I want to shift us to what we're proposing as it relates to benefits and specifically health insurance. Thanks again for that great overview. When we talk about staff compensation – again, wages is just one piece of that – it's also important to provide Head Start staff with comprehensive benefits. We know that our staff sometimes are leaving our programs to take jobs in other industries, as I mentioned before.

Sometimes they're doing that because they can secure better benefits in those other industries. This next set of proposed standards really aims to address the second important aspect of compensation, with a variety of benefits proposed for staff. Let's begin by talking about what we're proposing as it relates to health insurance for staff. All yours, Shawna.

Shawna: For our full-time staff – we define full-time staff as those staff working 30 hours or more per week during a program year – we want programs to provide access to health insurance. This can happen in a couple of different ways. One option would be for the employer – or in this case, the program – to provide and contribute to employer-sponsored health insurance coverage. Another option could be to educate, connect, and facilitate enrollment of employees and health insurance options in the HealthCare.gov marketplace or through the appropriate state-specific health insurance marketplace. A final option could be to ensure that an employee is enrolled in Medicaid to the extent that they're eligible.

For our part-time staff, who ... At a minimum, we want programs to connect these staff with health insurance options through either enrollment in health insurance options. That enrollment could be also, again, at the HealthCare.gov marketplace or through the appropriate state-sponsored health insurance marketplace, or – as for our full-time staff – enrollment in Medicaid, again, to the extent that the employee is eligible. Programs can also choose to provide employer-sponsored health coverage for part-time staff as well, so something for full-time staff and our part-time staff.

Khari: That is again, another great overview. As we're still kind of thinking about this and talking about this, we do know that health insurance coverage through an employer-sponsored plan can still come with a considerable out-of-pocket cost for the staff who is the beneficiary of that.

If grant recipients choose to offer employer-sponsored coverage, we encourage employers to provide an insurance plan that offers coverage similar to that offered by the silver, gold, or platinum plans that you can find in the health care marketplace. If grant recipients choose to facilitate enrollment of employees in a health insurance plan through that marketplace, grant recipients could choose to administer flexible spending accounts, sometimes called FSAs, for employees to defray that out-of-pocket health care cost. I just wanted to mention that as well.

We're going to pivot here. Still talking about benefits, but I want to move us now to what we are proposing as it relates to programs offering access to behavioral health services for full-time staff. We know that support for staff, and staff's mental health in particular, is really key for promoting staff well-being and, in turn, high-quality interactions with children that facilitate positive child development. But even with health insurance, out-of-pocket expenses like high deductibles or co-pays likely make it very challenging for individuals who are seeking behavioral health services. Anything to share about that, Shawna?

Shawna: Yeah, that's right. We want these short-term services to be offered with minimal or no out-of-pocket costs for staff. More importantly, we propose that programs must offer approximately three to five outpatient visits per year for full-time staff. Programs could meet this requirement, again, in a variety of ways. For example, an employer could offer an employee-sponsored group health care plan that includes and provides short-term outpatient behavioral health care at low out-of-pocket costs. Another example: Programs could offer an

Employee Assistance Program, also commonly known as an EAP. That EAP could qualify as an accepted benefit and can refer and connect employees to behavioral health resources and providers.

Khari: It all sounds good. We're not done yet. We still have quite a bit as it relates to benefits. I want to now move us to paid leave, so we'll turn our attention there. We are proposing that full-time staff – again, those working 30 or more hours per week during the program year – receive paid sick leave, paid personal leave, and paid family leave. Let's just start with more details on the paid sick leave. Shawna?

Shawna: For paid sick leave, we propose that programs offer an accrual system for sick leave that is based on hours worked, or by offering a set number of days. At a minimum, we're asking that the accrual must meet the standards set by state or local laws. We do not propose a specific required number of days per year for annual sick leave. But here is a particular place where we would love to hear feedback from you and the public about whether we should specify the actual number of sick leave days. Or as another option, should we specify a rate of accrual? A question for you.

Khari: All interesting. We also want programs who operate year-round to provide paid personal or vacation leave for full-time staff. We know many of our Head Start preschool programs operate similarly to a typical school year, and they closed during the summer months. But we also know that many of our early Head Start programs – and some of our preschool programs included – operate year-round, providing services to children during the summer months.

We're proposing that these programs offer full-time staff the accrual of paid vacation or personal leave that aligns with experience or time working at the program. We do not propose a specific required number of days per year of personal leave, but we would like to hear from you in the public about whether we should specify a minimum number of personal leave days or a specific rate of accrual. Again, another point where we definitely want to hear from you, Shawna?

Shawna: We're also proposing for programs to offer full-time staff job-protected periods of paid family leave that's consistent with eligibility for and protections included in the Family and Medical Leave Act. It's also commonly known as known as FMLA.

Here's just a little bit more about what that means. First, we propose for this policy to apply to all programs, even those that are not covered by FMLA due to employer size. In some cases, those are employers with fewer than 50 employees. Consistent with FMLA, we propose for eligible employees to receive up to 12 weeks of job-protected leave per every 12-month period. Also staying consistent with FMLA, we propose that the employee have at least 12 months of time with their employer prior to when they can start using this particular leave.

We propose that the reason for using leave must be a qualifying reason under FMLA. Some of those reasons include the birth, adoption, or foster care placement of a new child within one year of their birth, adoption, or placement. Another option is a serious health condition that makes the employee unable to perform the essential functions of their job. Another reason is the care for a spouse, child, or parent with serious health condition or qualifying urgent need



arising out of the fact that the employee's spouse, child, or parent is a covered military member on covered active duty.

Our family leave policy that we're proposing will require partial or full wage replacement for employees during the qualifying periods of leave. Programs that could meet this standard could do it in different ways. Those include providing short-term disability insurance that includes at least partial wages during these specific instances of leave. Again, here's another place ... We've already talked about a couple, but here's another place where we're really interested in hearing the public's thoughts on how we've structured this particular proposal on paid family leave.

Khari: There is just so much here. Again, thank you. You're doing, really, a great job of outlining this. I got a couple more questions for you as we think about the benefits that we're proposing in this NPRM. We do know that many of our staff members have children of their own who need care during the work day or after school as well. Child care costs can be prohibitively expensive, especially for very young children.

For those reasons, we are proposing that Head Start programs connect staff members who have children with affordable child care resources and information about affordable child care resources. This can include connections to child care resource and referral agencies or helping the staff member enroll in a child care subsidy program if they are eligible for it. Shawna, what else are we proposing as it relates to this idea?

Shawna: Yeah, I mean, we certainly know that some of our own Head Start staff have children that may be eligible for Head Start services. Being able to enroll your child in an early education program where you're also employed can be a great benefit for staff members. As part of our program selection criteria, we propose to clarify that programs can choose to prioritize enrollment of a staff member's child or staff member's children. Staff members' children would still need to be age-eligible, and they would still need to meet the eligibility category for services.

Khari: I hope it's clear. I mean, there really is a lot of thought that has gone into all of these proposals. It really is an attempt to be responsive to the feedback that we've been hearing for so long. In some cases, this is decades worth of data that we have received and have used to develop some proposed changes to the standards, to really be, again, to be responsive to the need out there.

As we continue thinking about benefits and proposed benefits for staff, we also recognize that, unfortunately, that student loan debt tends to be higher among the early education workforce than for the overall population. For eligible staff, we want programs to facilitate connections to Public Service Loan Forgiveness programs or another student loan debt relief program. This includes timely certification of employment for those staff members who are seeking Public Service Loan Forgiveness.

There are other possible benefits programs could offer to staff that could enhance a program's ability to recruit and retain a qualified workforce. It's important that programs regularly take a look at what types of benefits other employees, particularly public schools, are offering to their employees. We propose to require that programs examine their benefits package at least once every five years and consider if that package is competitive with that offered by local or

neighboring public schools. We encourage programs to offer additional benefits to staff, such as more enhanced health benefits; dental or vision benefits; retirement savings plans; flexible savings accounts; or life, disability, and long-term care insurance. Shawna, any thoughts on this one?

Shawna: Yeah. Here is, again, another place where we really are seeking input from each of you and other members of the public on whether or not we should require programs to provide full-time staff with retirement benefits. Really want to hear from you. We know that many public schools offer retirement benefits to staff. Programs have reported to us that even when they pay comparable wages, staff are sometimes leaving for public schools due to benefits, such as retirement plans.

We're specifically, again, interested in hearing from you about whether Head Start programs should require retirement savings benefits. Now, there's a range of options here, but this could range from employer assistance in establishing retirement accounts to a more comprehensive benefit that includes employer matching contributions. Just a couple of options.

Khari: This this is all good. I know that this is a lot of information that we're sharing, although some of you have heard versions of this before in previous webinars. Again, a lot of thought, time and attention given to supporting and stabilizing the Head Start and Early Head Start workforce across the spectrum. Again, teachers, family, service workers, custodians, and on and on and on and on it goes.

I'm going to shift us. We're still thinking about ... We're going to shift away from benefits. I want to talk about staff wellness supports. In addition to improving staff compensation, we recognize that there are other important aspects of supporting the workforce. We want to ensure that programs are a healthy, positive place for staff to work, a place where they can feel empowered and supported each day and really and truly give their best for children and families. In recognition of this, the next set of changes that we will discuss aim to support a positive work climate in programs. It also aims to support – or to promote rather – overall staff health, wellness, as well as to facilitate positive interactions between staff and children. What do we propose here in this regard, Shawna?

Shawna: First, we propose a requirement that programs should cultivate a programwide culture of wellness promotion that empowers staff as professionals and supports staff to effectively accomplish their job responsibilities. This could include addressing program management, such as implementing positive employee engagement practices, opportunities for training and professional development, and ongoing support from supervisors. We also know that the physical health of our staff is critically important to their overall well-being. Many Head Start classroom staff report physical pain related to their work. For us to help address this, we propose to require that programs ensure classroom staff have access to adult-sized furniture in their classrooms. By this we mean adult-sized chairs and desks. All of that can depend on what the classroom layout might allow.

Khari: Imagine that: adult-sized furniture. Well, I appreciate that though. Another important thing as we think about staff wellness. We also propose to require programs to provide regularly scheduled breaks for all staff during their workday, specifically for each staff member

who works a shift between four and six hours. We propose for these staff to have at least one 15-minute break per shift. For each staff member working a shift lasting six hours or more, we propose for these staff to have at least one 30-minute break per shift. These are minimums, and programs could choose to provide staff with longer or more frequent breaks, depending on the needs of their staff and children in programs. But these are the minimum durations, if you will, of breaks that we are proposing.

Programs must, of course, comply with state laws or regulations that are more stringent for staff breaks, if applicable. During these regular break times for classroom staff, programs must ensure that they maintain required staff-to-child ratios during those breaks. However, in order to facilitate staff breaks, one teaching staff member may be replaced during that break time by one staff member who does not meet the required teaching qualifications as long as this staff member has training and experience to ensure safety of children and minimal disruption to the quality of services.

It is really our intention that for classroom staff, these regular breaks should be scheduled for times that are least disruptive for classroom instruction or for routines. Good examples include during nap times or meals or outside play periods, etc. Of course, any staff member providing coverage in a classroom for a teaching staff member's break must have completed the appropriate background checks. Shawna, anything else on this?

Shawna: I mean, we certainly know – I think, for all of us – but certainly we know that for our classroom staff, they have moments where they're just feeling overwhelmed and just need a moment to gather themselves. We also propose for classroom staff to have access to brief, unscheduled wellness breaks, and that they're able to take those as needed.

We envision that these wellness breaks be a brief opportunity for staff to just step away, take a breath, and regroup before returning to children. These breaks could be, I don't know, about five minutes or so in length. It's our intention for programs to design and implement an approach that both provides for these brief wellness breaks for classroom staff and also continues to ensure continual child safety. We think programs will be able to support staff members who feel temporarily overwhelmed or stressed by the challenges of their position and certainly their work in classrooms and others that just might need a very brief break.

The number of unscheduled breaks could vary every day. In some days, an individual could need more of these unscheduled breaks, and on other days they might not need any, so it could really vary. This standard is intended to complement one of our existing standards that already specifies that a program must maintain ratios during all hours of program operations, except for brief absence absences of teaching staff for no more than five minutes. Again, here's another place where we're really interested in the public comment. For example, is the length or frequency of what we're proposing for these brief wellness breaks ... Is what we're proposing really ideal?

Khari: This is good. Again, we really are hoping to hear from you on this. Not just this, but on all the things that we are sharing with you today. I hope that you'll spend more time with these proposed changes and then and then share with us your feedback as appropriate. We're getting close here.

Finally, our proposed changes require a management style that encourages employee engagement, No. 1, but that also promotes and values open communication between managers and staff, that also identifies and addresses barriers to high-quality job performance for staff. How this looks will vary across programs, and we do understand that. Examples could include, though, recognition for high-quality work or open communication between management and staff, responding to feedback from staff, identifying and addressing barriers such as workload issues, and opportunities for discussions related to job satisfaction and performance. We also want employees to have a say in their professional development opportunities. Again, this kind of rounds out what we're thinking in this regard. Shawna?

Shawna: Now I'd like to pivot us to talk about our final proposed policy. Here, we'd like to discuss with you more about the number of families or as we call them caseloads assigned to work with family service workers. Our current standards do not include a requirement for a maximum or average caseload for our family service workers.

These staff, as we all know, play a critical role in providing individualized supports to our Head Start families, many of whom – many of our Head Start families have a very unique constellation of needs. Yet some of our family service workers, in some cases, have over 100 families on their caseload. So we're proposing to implement a maximum caseload of 40 families per family service worker. If a program can demonstrate that a higher caseload still allows for responsive, individualized services and is manageable for the family service worker, we will allow for that flexibility. Likewise, if some family service workers already have caseloads less than 40 families, perhaps they work with families who have particularly high needs, for example. We would encourage our programs to maintain that caseload level as well.

Khari: Yeah, this is actually one I really love too. The former social services coordinator from a Head Start program, this one is also really important to me and near and dear to my heart. I don't know if you were paying attention. Again, the emoticons were coming in pretty heavily as we walk through this one, so I know that this is resonating well. Thank you again for that overview, Shawna. Again, we're getting close.

I do want to now take us to kind of an overview of the timeline, because over and over again, Shawna and I have asked you please review the information and respond. Please respond with your own comments. Let's just take a minute to go over the bigger picture timeline that we have proposed for these workforce standards to go into effect after publication of a final rule. OK.

First of all, just today, we officially published the NPRM for public comment. So today, that 60-day clock, that that timer begins today. That public comment period will close 60 days from now, which will be on January 19th of 2024. We've got two full months for you all to review and then to share your comments and respond. After that, we in the Office of Head Start will need to consider those public comments, everything that you share with us. We will consider all the comments that we receive, and we will use those comments to inform the development of a final, revised set of Head Start Program Performance Standards through what we call a final rule.

The timing on publication of a final rule is tentative because we want to take as much time as needed to go through and consider every single comment that comes our way. In general, we tentatively anticipate that sometime in 2024, we will be able to go ahead and publish that final rule, but we're not exactly sure when that final rule will be published after the 60-day public comment period. Shawna, anything to add here?

Shawna: Yeah, just a little bit more detail on the timeline. Many of the changes that we've talked about in today's webinar and the webinars of last week ... Many of those changes would go into effect 60 days after the publication of the final rule. However, and particularly as we've talked about today, we know that some of the changes will require more time for programs to plan and prepare. So that's why for some, we've proposed a longer implementation timeline. That particularly pertains to some of these workforce standards that we've talked about.

Specifically, we propose that all of the standards related to staff benefits, that those would go into effect August of 2026. We propose for the standards for family service worker caseloads and staff breaks, that those would go into effect August of 2027. Then, finally, the proposed staff wages standards. Those would go into effect August of 2031. We think you'll see that there's a slow ramp up here of some of these proposed changes. Khari, let's talk a little bit more about the public comment period.

Khari: Yeah, we'll do it. I'm happy to do that. Thank you again and appreciate your overview. Listen, everyone out here in virtual land, you're going to hear me repeat something now probably for the fourth time on this webinar, so that probably signals how important it is. We absolutely want your feedback. What we're doing now is this is just sort of ... This webinar is just kind of giving you an introduction and an overview of what is being proposed. Many of you have elected to put comments in the chat box, and we appreciate that. But the comments in the chat box don't count as your feedback, all right? We want your feedback on all of the proposed workforce changes as well as many of the other quality improvements that we are proposing.

As you think about these proposed changes, we want you to think about it using this lens: How would any proposed change impact you and your program? Do you think that they would be good for the children that you serve or not? How do you foresee them impacting your community overall? Head Start staff and parents and families really and truly are the cornerstone of our program. Staff and parent and family engagement and policy making is an important part of what makes Head Start. Head Start. It's an important part of what makes Head Start program successful.

We hope that you will read the areas of the proposed standards where you have the greatest experience and the most expertise. We hope that you will make specific comments, whether positive or negative, so that we will know whether we got it right or we'll know what needs to be adjusted. But again, I know that many of you are making comments through the chat right now, and we appreciate that, but we really need you to share your feedback with us on the Federal Register platform, and we need you to do that by or before January 19th of 2024. Shawna?

Shawna: Khari, I really appreciate those questions. They're kind of helping me think differently about the types of comment that a program might submit in response to our NPRM. I join Khari in saying that we absolutely hope today's webinar gave you a clearer understanding of our proposed workforce standards. In particular, as a reminder, we have a collection of resources on the ECLKC website. Our hope is that these resources will help you understand both what we've talked about today as well as all of the other proposed changes in the notice of proposed rulemaking. On this slide, you'll see a handy QR code. We ask you to use this to visit that webpage.

When you go there, when you visit this page on the ECLKC, you'll see a couple of things so early in this week. A little bit later from today, we will release a tracked-changes document so that you can see exactly how these proposed changes compare with our current performance standards. I think that's an incredibly exciting and useful tool.

Here, you'll also find brief summaries of the different areas of changes as well as a bigger picture overview of our NPRM. Then, my personal favorite, you'll also find a few short videos from our director, Khari Garvin. One of those videos is targeted to parents and families, and the other video is targeted to you, our program staff. We encourage you to not keep those videos for yourself, but to share them. Share them with other staff and the families that we serve. We really, truly are hoping to hear, particularly from families and staff, on these proposed changes.

Finally, we have established an email inbox to collect questions that you might have more broadly on our CRM. You can see that email address up here on the slide. The email address is [OHS NPRM@acf.hhs.gov](mailto:OHS_NPRM@acf.hhs.gov). If you have questions about the process or proposed changes, we would encourage you to send those questions only to this email address. But again, to echo what Khari shared earlier, do not send your comments, your formal comments, on our NPRM. Do not send those to that email address. We can only consider your formal comments if they are submitted through the Federal Register or in writing to the mailing address.

Again, with this handy QR code, you can find more information about how to submit your comment. Oh, and one more reminder: Our current Head Start performance standards, as I mentioned earlier in our time together, they absolutely remain in effect until our final rule is issued. Now, Khari, I think we've covered it all. Have we covered everything?

Khari: I think we are we are nearly there, so I'm just going to close this out with just a final thought, if I may. Before I do that, for all of you in virtual land and there are almost – I don't know – 13, 1400 of you. Would you please give a virtual round of applause to my co-host, Shawna Pinckney, who is a walking Head Start encyclopedia and has shared, I believe, in fine fashion, a tremendous overview of all that we propose there. Lighting you up, Shawna. Lighting you up right now. Thanks for thanks for doing that, guys. She really has led us, walked us through this very well. Shawna, publicly, I want to thank you for the comprehensive way that you have walked us through all of this. My offer to give you Thursday off still stands. OK, I'll give you the whole day.

Shawna: Looking forward to it.

Khari: We do seriously hope that this webinar has clarified many of the proposals related to supporting the workforce. Anyone who has interacted with a Head Start program, even for a

short time, has witnessed the commitment of program staff. Here at the Office of Head Start, we deeply value the vital contributions of each and every role. Staff deserve to be supported. They deserve to be safe. They deserve to have healthy workplaces and to be healthy in their workplaces. Period. That's it. They deserve that.

We have to take this opportunity to help stabilize this tremendous workforce and sustain our programs moving forward. We anticipate that our proposed changes for increased compensation and other supports will accomplish exactly that. Please be sure to go to the Federal Register and tell us what you think of these proposed policy changes – good, bad, or otherwise. I want to thank you so much for joining us today for this webinar. For those of you who celebrate Thanksgiving, if you celebrate it, I hope that it is that this holiday is exactly what you want it to be. If you don't celebrate it, I just hope that you'll find time for yourself in whatever way feels good to you. Thank you for your time and attention today. So long everyone. Bye-bye.