

Addressing Questions on the NPRM

Glenna Davis: Hello, hello, hello, everyone, and thank you so much for joining us today. We're going to be having the OHS webcast, Supporting the Head Start Workforce and Consistent Quality Programing, Answering Questions on the NPRM. It is now my pleasure to turn the floor over to our director, Khari Garvin. Khari, the floor is yours.

Director Khari Garvin: Well, thank you so much and good afternoon to you and good morning to others of you. Thank you so much for being here today. We are really thrilled to be speaking with all of you again about our recently published Notice of Proposed Rulemaking, sometimes referred to as an NPRM. And I do want to thank everyone who has already attended our other webinars on the NPRM, as well as either the virtual or in-person roundtable discussions that we've been recently having with grant recipients around the country.

And for those of you who may have missed our prior two informational webinars where we went over the policies in detail, we do want you to know that there are available for viewing on the ECLKC website. We have learned so much from everyone already, and it's been wonderful to hear from people all around the country about your thoughts on our proposed regulations. Today, we are going to be talking through some questions that we have received so far related to the NPRM and some areas where we know folks have requested clarification.

I need to emphasize right now that these are proposed policy changes. Again, I say these are proposed policy changes. They are not final. We are currently soliciting comments which are due by January 19th of next year. That is to say, January 19th of 2024. And after ACF reviews all of those comments, we will issue a Final Rule sometime in 2024.

I have with me here, the very talented Lindsey Hutchison, who is our senior policy analyst on our Office of Head Start policy team. And she and I will tag team this effort today, and we will answer some questions that you have submitted already, either again through our webinars or in our email box. And as with previous webinars, this webinar Q&A feature will ... Pardon me. As with previous webinars that we've had, the webinar Q&A feature will be available to you, but we will likely not have time to answer those individual questions today. But with that, Lindsay, please take it away.

Lindsey Hutchison: Thank you so much, Khari . Good afternoon, everyone. Thank you so much for joining us today. Before we dive in, I want to just briefly go over how the webinar will work today, so you can use the chat function to communicate with presenters and the Q&A function to submit questions. Live Spanish interpretation is also available for this webinar, and we'd love to hear your questions, but we may not have time to address them directly today. We'll talk more about resources for more information at the end of the webinar.

All right. I'm going to dive into the questions. First we are going to go over some questions related to funding and enrollment as it relates to our NPR app. The first question that we have for you, Khari , is would additional funding come with the proposed regulations?

Khari: I know that that one is always top of mind. Let me just say, first of all, that the Biden-Harris administration continues to prioritize funding for Head Start. And we will also continue to

call on Congress to fund Head Start at a level that allows us to provide the quality of services that we desire, as well as to provide wages and to retain and recruit qualified staff. But no additional funding is specifically attached to these proposed regulations. That said, what we are proposing is using the resources that we have right now to best serve children and families. I've said this before, but we really are at a critical moment for Head Start, and we have to recognize what it really costs to provide high quality early education services to the most vulnerable children and families in our country, including competitive compensation for staff. Now, we fully recognize that the Office of Head Start is proposing this set of changes that may require programs to make some difficult tradeoffs in program structure. And we also must acknowledge that most of our programs are under-enrolled. And finding qualified staff who will accept positions at current wages remains our biggest challenge.

But we strongly believe these steps are necessary to stabilize the Head Start program for the long term, and to really regroup ourselves in what we do best for children and families. In the absence of additional funding, the proposed rule may come with some hard tradeoffs that could include restructuring budgets to serve fewer children, essentially focusing on how we strengthen services for currently enrolled children, even if that might eliminate the flexibility to serve more children in the future. We know that none of our programs wants to cut slots, even those slots that are currently vacant. Especially when we know that many children and families need our services, and when many of our programs have waiting lists. But Head Start has never really been funded to serve all eligible children and families, to be fair.

Ultimately, we are not in control of what funding increases come from Congress, but we are in control of the quality of services that we deliver to children and families. Again, I say this administration will continue to work with Congress to be very clear about the service level we can provide with our current appropriation, as well as the amount needed in future years, to ensure that we can continue to provide the highest quality early childhood program.

Lindsey: Thank you. Khari, I know that that's an important set of points to go over, that is top of mind for folks when they think about this NPRM and implementation. The next question I want to ask relates still to this same topic. How would these proposed policies be implemented if there were no additional congressional appropriations related to this NPRM. Would Head Start programs have to serve fewer children?

Khari: Again, a very important question. Repeating myself, we hope that we get the additional funding from Congress to support the proposals in the NPRM. We really do. But again, in the absence of additional appropriations, it is possible that some programs may need to make some trade offs here by progressively offering fewer spots to children in future years. Now, on a national level, we have estimated that most of the proposals in the entire NPRM – I can't get it out today – can be paid for by reducing our funding enrollment to match the number of children we are actually serving right now. Let me repeat that again. We have estimated that most of our proposals in the NPRM can be paid for by reducing our funded enrollment to match our actual enrollment.

Our funded enrollment right now is approximately 755,000 slots nationally. But our actual enrollment is about 650,000 of those 755,000 slots. And we further describe these estimates in the Regulatory Impact analysis section of the NPRM document that's on the Federal Register.

Now, what's most important about all of this is that we would be able to serve Head Start children and families better with healthier and more consistent staff with the same outstanding credentials. Thanks for the question.

Lindsey: Thank you, Khari . We have also been hearing that small programs and our fully enrolled programs are struggling to determine the best way they would implement these proposed changes if they are published in a Final Rule. Would these types of programs have to cut even more slots, or would they have to un-enroll children who are currently enrolled? How would they remain a viable business without additional funding to support these changes?

Khari: Yeah, we've heard this one a lot. Again, I appreciate the question. For those that have raised that so often. Look, I recognize again, the serious trade offs that we have been discussing are particularly tough for small programs or particularly tough for programs that are currently fully enrolled. And for this reason, this is why, at least in part, that we are proposing a phased in timeline for our proposed changes that have significant costs, including the staff wages and benefits and the staff breaks and the family service worker caseload, parts of the of the proposal. And this is really to give programs more time to thoughtfully plan for changes that they would need to make to their programs. But it also gives more time for Congress to appropriate the funding that that is really needed to support the proposals.

If this proposed rule is finalized, we would begin working with programs right away so that they can plan for changes in enrollment levels over time without cutting children who are currently enrolled in the program. But without additional funding, we would expect these programs would need to reduce their total slots offer. But to do that in future program years. We expect no child who is currently served in the program would lose their services because of this changes, even if we don't get additional funding to support these changes. But I want to be clear, we would not want programs to cut currently enrolled children to make these changes. Instead, with careful planning, we would expect that programs would offer fewer slots in the future, progressively, and future program years.

As we will discuss later in this webinar, we have proposed different implementation timelines for the proposed policies. Some would be sooner and others would come later. These really are good and important questions, and we strongly encourage you to submit your thoughts on these issues as part of your public comments through the Federal Register. Thanks for that question, Lindsay.

Lindsey: Thanks, Khari . Next, I want to ask you another related question. We have heard some feedback about this as well. What about programs that are submitting a change in scope request to reduce enrollment right now, where programs are thinking about doing that soon, should those programs be implementing the proposed changes to the workforce standards or some of these other proposed changes in the NPRM?

Khari: Yeah, again, another great question. Once again, we do recognize that many programs are currently in the midst of the change in scope process, or there are programs that are really seriously thinking about starting the change in scope process, and they are already requesting enrollment reductions or conversions with the goal of reinvesting those funds in their workforce or to implement other quality initiatives in their programs. We understand that

these are already underway for some programs or that programs are really giving thought here. For those programs that are deciding such structural and budgetary changes or necessary for their programs now, we encourage those programs to continue on with the change in scope, process and alignment with the prior information memoranda, and other guidance released by the Office of Head Start.

These policies are proposed. That is to say, the policies in the NPRM are proposed and programs are not required to comply with the specific policies in the proposed NPRM right now. Restructuring a program to align with the proposed changes of the NPRM would be just a little bit premature right now, since we don't have the final version of that rule published or issued yet. The current Head Start Program Performance Standards remain in effect until a Final Rule is issued. Really hoping that that's clear.

Now, we have covered some important content already just in a few minutes that we've been spending together related to the funding and the enrollment aspects of this. But I do want Lindsay, for us to shift gears just a little bit now to some questions that we received on workforce proposals. Why don't we do that?

Here's a question, Lindsay, that I know that lots of folks would like an answer to. And the question is, why is it that OHS is proposing the implementation window of August 2031, which is approximately seven years after we get a Final Rule for the proposed wage standards to go into effect? We've heard from many programs that the workforce crisis is urgent and that they're wondering why we would propose such a long implementation timeline. Can you speak to that?

Lindsey: Yes, I'm happy to. Thanks, Khari. We think our proposal would give Head Start programs the time they need to plan and to work out a sustainable program model that does not ask our Head Start staff, who are often women of color, to work at poverty level wages. We intentionally proposed in implementation timelines for the biggest policy changes, both to give programs time to plan and allow Congress the opportunity to act. We want to be thoughtful so that each child who enters a Head Start program remains there until they start kindergarten. If the proposed requirements become final, we would expect programs to begin phasing in wage increases over time so that they are in compliance by August 2031.

Furthermore, not all of the proposed policies in the NPRM are on this extended timeline until 2031. Many of the proposed policy changes, such as those focused on mental health, determining barriers to enrollment, and revise community assessment procedures, would need to be implemented about one year after publication of a Final Rule. And others like the proposed benefits policies for staff, proposed family service worker caseloads, and proposed staff breaks policies would be effective 2 to 3 years after publication of a Final Rule. And still others, particularly those focused on child safety and those that are more minor clarifications and updates would be effective 60 days after publication of a Final Rule.

Finally, programs always have the option to implement any parts of the Final Rule sooner than the effective date, if desired. This includes those proposals that would address wage standards. We do want to hear your thoughts about our proposed implementation timeline, and we will be addressing this more later in the webinar.

Khari: Oh, that's great, Lindsay. Thank you for that. I got another one for you, of course. Would the proposed wages policies apply to all programs, including Early Head Start programs?

Lindsey: Yes, I remember we received this one multiple times on our past webinars. The proposed wage policies, as well as the rest of the proposed policies in the NPRM, would apply to all Head Start programs as we are proposing them, including Early Head Start and including our American Indian and Alaska Native programs and our migrant and seasonal programs. The requirements would also apply to Early Head Start-Child Care partnerships. Furthermore, the proposed standard on staff wages would require a program to consider responsibilities, qualifications, and experience of teachers when thinking about salaries.

Khari: All right. Thank you for that. There have been a lot of questions, Lindsay, about wages. I have another one for you. What does the proposed minimum pay wage standard actually mean? How would a program calculate that?

Lindsey: Thanks, Khari. Yeah, I remember we have received this question multiple times as well in the past webinars. We we've done on the NPRM. We are, as you are talking about, they're proposing a new standard that would require programs to establish a salary floor or minimum pay for all staff that is sufficient to cover basic cost of living in the program's geographic area. This standard is really intended to ensure that all staff in the program earn a wage sufficient to cover their basic living needs. This proposed standard includes specific examples of the types of living expenses programs should consider as part of that basic cost of living, such as food, housing, utilities, medical costs, transportation, and taxes. In the preamble, there are a few examples that we give of existing publicly available resources that could help programs calculate basic cost of living.

For example, one such tool that we talk about in the NPRM preamble is a publicly available tool called the Living Wage Calculator, developed by experts at MIT. Another helpful tool that we also discuss in the preamble is the Self Sufficiency Standard, developed by experts at the Center for Women's Welfare of the University of Washington. These types of publicly available calculators take into account a variety of costs for basic needs and how these costs vary by geographic area. Our proposed policy in the NPRM would allow programs to choose to calculate their own minimum pay estimate. We're not requiring that they use one of these tools. Those are just examples of available programs. Programs could consider looking into other data sources to determine expected costs for their geographic area.

For example – we also discussed this in the preamble – fair market rent estimates are published annually by the U.S. Department for Housing and Urban Development, and those could be used to estimate housing costs. Our goal with this proposed policy is to really lift the salaries of all staff in Head Start programs. Upon publication of a Final Rule, if this proposed standard is part of the Final Rule, ACF would anticipate providing grant recipients with TTA supports on this topic.

Khari: That's great. Excellent, excellent, excellent. I still got another one for you on wages. Keep that wage hat on if you don't mind. Another question that's come to us a lot, is would the

proposed wage policy cause wage compression for other positions like managers and supervisors? What do you think about that?

Lindsey: Thanks, Khari. Yeah, that is one we've heard that could be a possible unintended consequence if you're raising wages significantly for those education staff. One of the other proposed policies in our wage section is for programs to establish or update their overall pay structure for all staff positions by August 2031. We are assuming most programs already have a pay structure in place, whether they call it a wage ladder or a salary scale or something else. This proposed standard is really asking programs to take a look at that pay structure and ensure it considers staff responsibilities, qualifications, experience, and hours worked when determining salaries for positions. In other words, programs would need to review the salaries and wages they are paying to each staff position in their program and how that compares to wages paid for similar jobs in the surrounding community. Programs would also need to consider the qualifications and experience of staff when updating that pay scale.

As the saying goes, a rising tide lifts all boats. And that's really our hope here with this standard. That's what this proposed standard is trying to do. We would expect that updating a program's wage ladder would improve wages for a variety of staff positions that programs are also reporting difficulty with recruitment and retention for. We do recognize that if programs lift wages for education staff, they would by necessity have to lift wages for other positions. For instance, we know programs are having difficulty filling positions like family services staff, bus drivers, custodians, kitchen staff, mid-level managers, and also center directors and other leadership. While not all of these staff necessarily leave Head Start due to low wages, many do. As programs consider how to restructure their wage ladders to include the significantly higher raises for education staff, we would expect that raises for these other staff positions would need to lift as well.

Khari: Wow. OK, look. I've got like two more on wages, I hope we're not burning you out here, but there are a couple more questions that have that have come up frequently for us. The next one is what would the proposed wage standards mean that, for example, a Head Start preschool teacher with a CDA should earn the same salary as a public school preschool teacher with a bachelor's degree.

Lindsey: Thanks, Khari. I'm glad we're talking about this one. I know it's also been a point of confusion. The proposed standard is asking programs to take into account staff responsibilities, qualifications, and experience when determining wages for education staff. In general, we do recognize that a teacher with a bachelor's degree should likely earn a higher salary than a teacher with a CDA. However, experience is also very key to consider here. In your example, Khari, let's say that Head Start preschool teacher with the CDA has 20 years of experience, and let's say the public preschool teacher with the bachelor's degree is brand new to teaching. In this situation, it's really critically important for the program to be looking at that and taking into consideration those many years of experience of the teacher with the CDA, when determining what their salary should be kind of relative to that anchor of the public preschool teacher salaries.

In the proposed standards, we really do stress this importance of considering experience as well as responsibilities and qualifications when establishing a salary scale that set wages for staff.

And it's really up to programs to determine how they want to consider these things when they're updating their pay structure. We're not proposing that each Head Start educator would necessarily earn the exact same wage as a public preschool teacher no matter what. What we're proposing is that they earn a comparable wage once you have accounted for these things responsibilities, qualifications, experience. We would expect that an educator with more responsibilities than their public school counterpart would earn a higher wage, assuming all other things were equal. The same goes for those with higher qualifications and more experience.

Again, it would be up to programs to look at what a comparable wage would be for someone with those similar responsibilities, qualifications, and experience, and programs would decide how to adjust for these and that would guide the development of their salary scale.

Khari: That is a really, really great clarification. Like I said, I told you I had a couple more. I got one more for you, at least on wages, at least for right now. What if there are no comparable wages in the public school system, like no public preschool nearby, or for positions like home visitors that the local school district might not even have, how will that work?

Lindsey: Yep. Thank you. That's another good question. If there are no public preschool teachers in the programs local area, we do have another standard proposed that allows flexibility for programs to use an alternative method to determine comparable preschool salaries. This alternative method would need to be approved by the Office of Head Start. For instance, a program might consider looking at salaries of public preschool teachers in a different area that is geographically or socioeconomically similar to their own service area. Or as another example, a program might consider anchoring their education staff salaries to a specified percentage of kindergarten to third grade teacher salaries in their local school district, if that method was approved by the Office of Head Start.

To address that second question about home visitors and thinking about what would be a comparable position in public schools, let's take an example. Let's assume that a home visitor and a lead teacher could reasonably be considered to hold similar important responsibilities within the context of the Head Start program and the role that they play. Both play a primary role in supporting the development of the children being served by the program. Therefore, if a home visitor has a similar credentials and experience as a lead teacher in the program, then the program could consider compensating that home visitor at a similar level as a lead teacher. However, if a home visitor holds a lower credential or less experience than a lead teacher, the program could reasonably compensate the home visitor at an amount below that more experienced teacher.

And we are specifically asking for feedback from you all, from the public, on this approach discussed in the NPRM regarding home visitors and comparable positions in public schools, as well as other types of positions and what their comparable counterpart could be. We do appreciate and value your input through the public comment process on whether there are comparable roles that you've used and how that might look in your program.

We are now done with that section and ... Well, no, I'm sorry. I spoke too soon. We do have a couple of more on wages that are for you, Khari. The next one I'm going to put to you here, how would wage comparability work when some staff don't work in the summer?

Khari: Oh, I see. I've asked you so many questions about wages. Now you want to ask me a couple as well. That's fair. That is fair. OK. On this particular question, it really is a good one. Our intention here with that proposed wage policy for education staff is for the annual salary of these staff to be at least comparable to the annual salary of public school preschool teachers. And as you mentioned, but adjusted for responsibilities and qualifications and experience, regardless of whether this salary is paid out over 12 months or over nine months or over a different amount of time. For example, say the teachers in the Head Start program work nine months during the program year. And let's say this Head Start program chooses to compare salaries to local public school preschool teachers that work ten months. The policy goal is for the annual salary to be equivalent across these groups, and the salary would be paid out over nine months for Head Start staff versus ten months for the public school preschool teachers. Program pays their teachers hourly wages, then the proposal would require that the hourly rate reflect the equivalent annual salary level.

Lindsey: Thank you, Khari. I have another question for you. Do the proposed workforce standards include a requirement for programs to provide retirement benefits?

Khari: No. The proposed benefits policies in the NPRM do not include retirement as a requirement. However, we are specifically asking the public to give us comments on whether retirement benefits should be included in a Final Rule, and if the public thinks retirement should be required, we also are asking folks to tell us what type of retirement savings benefits should be required. For example, retirement savings benefits can range from employer assistance in establishing retirement accounts to more comprehensive benefits with employer matching contributions. These are just examples.

Lindsey: Thanks, Khari . OK, now we are going to shift gears. I know we've talked a lot about the proposals on the workforce, and we want to shift focus now because there have also been questions on other aspects of the NPRM. The next question I have for you is, again, kind of going back to that timeline, and we want to reiterate some of that in a little more detail. When is the Office of Head Start proposing that all of these proposed changes would go into effect? Does everything go into effect in 2031?

Khari: All right. Short answer is no. Many of the proposed changes would be on a different implementation timeline and would take effect before 2031. As you can see on this slide, the wage policies would have the longest implementation timeline of seven years, with a proposed effective date of somewhere around August of the year 2031. However, other policies are proposed to go into effect much sooner. For example, as you can see again on this slide, the proposed community assessment changes, evaluating barriers to enrollment and attendance, and changes to strengthen mental health supports are proposed to take effect approximately one year after publication of a Final Rule.

The staff benefits policies would take effect approximately two years after publication of a Final Rule, and the proposed policies for staff breaks and family service worker caseloads could take

effect approximately three years after publication of a Final Rule. Any proposed policy that is not listed here, such as, for example, the Housing Adjustment policy, the Head Start terminology changes, and the lead testing policies, among many others, would take effect 60 days after publication of a Final Rule.

And please remember that these effective dates are also proposed. This means that you can submit comments if you want related to these proposed implementation timelines as well. For example, if you think that a proposed policy should take effect on a faster timeline or a shorter timeline, you can tell us that in your comments as well.

Lindsey: Thank you, Khari . We propose several changes in the NPRM that, if enacted, would hopefully build and support stronger mental health supports and programs. And we have heard some questions related to the multidisciplinary mental health team that we are proposing. Specifically, how would that propose multidisciplinary mental health team be staffed?

Khari: Good question. The intent of our proposed policy for this is for programs to have flexibility in determining the appropriate composition of that multidisciplinary team. Multidisciplinary means the involvement of two or more separate disciplines or professions that actively work in tandem with parents to provide support for children and families. Many Head Start programs already have this practice in place in the form of case conferencing, or teams comprised of multiple individuals that may work with children, families, or staff in different capacities. As an example, staffing of the multidisciplinary mental health team could be including a family service worker, a teacher, mental health manager, disability service coordinator and health specialist. But this list of roles is not required, nor is it exhaustive.

Because we anticipate that this element of the proposed rule would result in additional work for a variety of program staff, we did include potential costs related to this proposal in the overall cost estimates that we described earlier. And in general, if the idea of the multidisciplinary team is not clear to you as we describe it in the preamble, please just tell us that in your public comments as well as that's important feedback for us to hear.

Lindsey: Thanks, Khari. I have another question for you related to our proposed changes for mental health services. Does the NPRM propose to require, when it comes to mental health consultation, that mental health consultants must be licensed providers?

Khari: No. Consistent with the current standards, the mental health consultant can be a licensed provider, but the proposed policy would also allow programs to secure mental health consultants who are working under the supervision of another licensed individual. The intention of this proposal is to open a larger pool of mental health consultants to choose from, and provide opportunities to build the mental health workforce in the early childhood education field. In this vein, the preamble of the NPRM also discusses that if a mental health consultant cannot be on site, teleconsultation services can be utilized. We recognize that hiring a mental health consultant can be a challenge, especially in rural communities, and public comment is a great way to let us know how these and other mental health consultation proposals would impact your program.

All right, Lindsay, I think I've answered enough. I got a couple for you. All right. The NPRM proposes many other policy changes that are geared toward improving the quality of Head Start

programming. And I want to make sure we share what we are hearing with respect to these proposals, beginning with transportation. All right. Here's the question. Does the NPRM propose to require that Head Start programs offer transportation to enroll families?

Lindsey: Thanks, Khari . Our proposed policies do not require programs to offer transportation, but rather, programs would need to consider potential barriers to enrollment and attendance. And transportation could very well be an identified barrier. We are proposing that as part of the community assessment process, programs would need to identify transportation resources, or lack thereof, in their community as they consider what kinds of barriers children and families in their community may face regarding engagement in the Head Start program. And then programs would be asked to consider why children who are selected for the program don't end up enrolling or enroll, but do not attend regularly. Lack of transportation is one possible barrier that we do encourage programs to consider here. Finally, where possible, we ask programs to address these barriers that could mean that a program decides to provide or facilitate access to transportation if feasible.

Khari: Yeah, thank you for that. Another question here. This has come up a lot. Can you go over one more time, please, the proposed adjustment to family income for excessive housing costs?

Lindsey: Sure. I am happy to. And I think this is best done by walking through an example of our proposed housing deduction policy. Let's take, for example, a family of five that makes 40,000 per year. To determine eligibility, we would look at the 2023 federal poverty level, which is 35,140, in annual income for a family of five. According to our current standards, this family, then, is not below 100% of the federal poverty line and therefore would not be eligible for Head Start services under this particular eligibility criterion. But let's say that this family spends 20,000 on housing costs per year, which is 50% of their total gross income. Under our proposed rule, a program could consider deducting any amount of housing expenses over 30% of a family's income.

For this example, 30% of the family's income would be \$12,000. To determine this total deduction, programs would take the total the family spends on housing, 20,000, minus 12,000, which is the 30% of their total income, for a total deduction of 8000. This means the program would be able to deduct 8000 from the family's total income to determine their new adjusted income for eligibility purposes. This family that made 40,000 per year and was originally above the federal poverty line, would now have an adjusted gross income of 32,000. And because the adjusted income is now below 100% of the federal poverty level for a family of this size, the family would now be eligible for Head Start services using an income based determination.

Khari: I think that is a really clear thanks for that. I'm going to shift gears here. Another question is coming a lot. Would Head Start programs have to purchase all new furniture to meet the proposed requirement for adult size furniture and classrooms.

Lindsey: Thank you for that question. Our proposed policy would require programs to make adult size furniture available to staff, but it would be up to programs to decide the best way to accomplish this. For example, this could be through adding 1 or 2 chairs or a desk to each classroom. Some programs may already have this type of furniture available to move around in the classrooms, where others may need to purchase more.

OK. Now we're going to turn to a few questions we've received related to public comment. It's your turn again to answer here, Khari. Are all proposed policies included in the NPRM open for public comment?

Khari: Yes, that is a short answer. The Office of Head Start invites comment on all of the proposed policies in the NPRM. Individuals and groups are encouraged to submit comments on anything written in the NPRM, including proposed changes to Head Start terminology and definitions. I want to emphasize this point. We have proposed new definitions as well as changes to many existing definitions. You can submit comments on the proposed definitions, and these definitions are proposed and not final until we issue a Final Rule. Thanks for the question.

Lindsey: Thank you. Khari . We are running tight on time. We have about four minutes left. I am going to ask you one more question, and then I think we'll be just about ready to wrap up. Will OHS actually consider the comments submitted by the public as part of the development of the Final Rule?

Khari: Absolutely, yes. The short answer is yes. We will absolutely consider the comments that are submitted. And by the way, everyone who is logged in, your comments really do matter. We will absolutely be considering these comments as we write the Final Rule. This is a requirement, by the way. By law, the Office of Head Start cannot issue a Final Rule until we consider and respond to all comments that we receive. We encourage the public to send us comments through the Federal Register. We can only consider comments that we receive in writing through the Federal Register, and we want to hear your thoughts. The most helpful comments provide constructive, detailed feedback, whether positive or negative. If something is confusing in the NPRM, please tell us that in your comments, and we'll work to make it more clear by the time that we're ready to issue that Final Rule.

But now is the time to let us know what you think you have until January 19th, 2024, no later than that to send us your thoughts. We will not be extending this comment period, and we absolutely want to hear from you. And I think that we have made it now to essentially the end of our webinar with about two minutes to spare. Please let me just use these two minutes to let you know that we absolutely want to hear from you. Want to thank you for carving out time to join us today for this webinar, and we hope that the webinar answers some of your questions about the NPRM. These were frequently asked questions that we've been receiving. We did our level best to really answer those questions.

We have a collection of resources on the ECLKC website to help you. The QR code that you see on the screen now, please scan that to visit that web page and you can find summaries. You can find fact sheets. You can find a document with the proposed changes to the Head Start performance standards shown in track changes. There are some short videos that explain an overview of our proposals, but please be sure to go to the Federal Register and tell us what you think of these proposed policy changes. Thank you so much, and we hope that you see this as an opportunity to be a part of the process. Thanks, everyone. So long and have a great weekend.