

## Head Start Program Performance Standards 2017: Eligibility and Selection

(upbeat music)

Tanesha Canzater: Hi, I'm Tanesha Canzater.

Catherine Hildum: And I'm Catherine Hildum.

Tanesha: And we're here to talk more about the eligibility and selection sections in the Program Performance Standards. Like other sections in the standards, these sections were updated to reflect changes in the 2007 reauthorization of the Head Start Act. Some of the provisions have not changed.

However, we did streamline and simplify some of the sections to make them easier to follow. The overarching goals, however, do remain the same. Programs must ensure, based on their community needs assessment the most-vulnerable children and families are selected and served. Section 1302.12 is entitled Determining, verifying, and documenting eligibility. This section guides programs in determining who is eligible for Head Start services.

Catherine: Section 1302.14 is selection, the selection process. This helps programs determine how to select children for Head Start once they're determined to be eligible. We are gonna go a little bit deeper into these sections and also talk a little bit about some of the questions that we've been receiving as grantees have implemented this section. Is it true that some of these provisions are long-standing provisions and then some of them were updated to reflect the changes in the 2007 reauthorization of the Head Start Act?

Tanesha: That is true. The Head Start Act added some provisions to eligibility, and now, all of those provisions are in the final rule. Of course, programs have been following these requirements since the reauthorization, so there are no changes in practice. However, since most of the eligibility section is required by statute, it cannot be changed in the regulation. Such as income eligibility, age eligibility, and duration of eligibility.

Catherine: Okay, so in other words, the regulations are now caught up with where the provisions in the Head Start Act and everything is matching.

Tanesha: That's exactly right.

Catherine: Okay, great. So that means children are still eligible as they have been for a long time if their family income is at or below 100 percent of the poverty level, if they're homeless or in foster care, or if they're receiving public assistance. So is the eligibility section in the final performance standards the same as the final eligibility rule that was issued in 2015?

Tanesha: Yes it is, and we only made technical changes to the Performance Standards to clear up some confusion that we had in the 2015 final eligibility rule. For example, we removed separation between categorical and income eligibility just to eliminate any confusion. Because these are simply several ways that a person can be eligible, a family can be eligible for Head Start services.

Catherine: Oh, that makes a lot of sense. I think it really was easy for people to get stuck on that distinction. And it's not really meaningful. There's a new provision, I noticed on alternative eligibility. How does that work, and what does that entail?

Tanisha: So the alternative eligibility allowance is designed to promote innovation and flexibility for programs to ensure that the most vulnerable children in their communities are served.

Catherine: Okay, so programs can really, if they can justify it, can come up with a system that works for their community and the needs of their population.

Tanisha: That's right.

Catherine: Okay, great. And I noticed that in the public assistance provision of eligibility, that there's a new language about child-only TANF payments. How does that work, or what does that mean?

Tanisha: So this provision is intended to accept children who receive TANF only payments, or TANF payments. And these children are typically your most vulnerable children. They're in kinship care, but they're not a part of the state child welfare system, and they don't receive public assistance.

Catherine: Okay, so essentially, they're living with family members maybe, and the family isn't eligible for TANF, but the child would be eligible for child-only TANF payment.

Tanisha: Absolutely.

Catherine: So by virtue of that, they would be eligible for Head Start.

Tanisha: Absolutely, that is correct.

Catherine: Okay, and there's I know, a lot of questions and confusion at times about the provisions about over income families. Do the provisions about serving families over income change?

Tanisha: No, those provisions did not change. Programs are still allowed to have 10 percent of their enrollment be over the poverty line. A program can also serve an additional number of families who fall within the 100 and 130 percent of the poverty line as the Head Start Act allows. The Performance Standards clarifies that if programs use this 100 to 130 percent category, they must be able to report to the regional office that they have met all of the criteria for doing so.

Catherine: Oh, okay. So they don't need to ask permission to use that 100 to 130 percent category, but they're required if asked to be able to document and justify that they're using that. Now, let's talk a little bit more about selection. It's really, this is where our programs have to make important determinations when they look at their list of eligible applicants. The selection section requires that they set criteria to ensure that they're serving and prioritizing and enrolling the most vulnerable children first. And the selection process, like the rest of their program operations, must flow directly from the community assessment. What is needed in their community? Who are the most vulnerable children? And grantees have the flexibility to ensure that the unique needs of their community are met.

Tanesha: So Catherine, is it a new provision that programs must prioritize serving younger children if the Head Start eligible four-year olds could be served by high-quality pre-K full day services in the area?

Catherine: Yes, that is a new provision in the Head Start Performance Standards. Programs must prioritize serving younger children if high-quality, full day preschool is available for four-year olds in their area. Programs are still allowed and still can serve and enroll four year olds, but if there is another program in which the child could be served, then a program must allow more for three year olds to enroll so that we're serving the most vulnerable children for the longest period of time.

Tanesha: Now, the selection section also has provisions about children with disabilities. How do we define a child with disabilities?

Catherine: That's a really good question. I think that gets confusing for some programs. Children with disabilities in our regulations are defined as they are in the Head Start Act as meeting the definition in the Individuals with Disabilities Education Act. And that definition is in our regulations in 1305. In other words, children who qualify as part of the 10 percent of enrollment of children with disabilities must have an individualized education plan, an IEP, or an IFSP.

In addition, the section also clarifies that programs must have 10 percent of their total funded enrollment be children with disabilities. There was a lot of confusion previously about whether if they had Head Start and Early Head Start, just 10 percent of each. It's 10 percent of their total funded enrollment. That's 10 percent of the total funded for each grant. Tanesha: So can a grantee select children for any of its centers as long as the child resides within its service area? I'm thinking of the example of, could a grantee enroll a child at a center closer to a parent's work rather than closer to that family's home?

Catherine: Yes, programs do have that flexibility, and there's no residency requirement in our eligibility or selection, and programs should determine what works best for the families. And in order to ensure that they're meeting the needs of the community. So if a program has a family who would rather, or prefer to enroll their child in the center, they have the ability to do that as long as it meets all their criteria and works for all the other factors in their selection process.

Tanesha: Okay.

Catherine: Tanesha, I hope in this conversation, we've been able to really clarify some of the places in the Performance Standards where we've added some clarity and some streamlining and really simplified some of these provisions.

Tanesha: I think we did. We'd also like to encourage everyone to check out other videos in this showcase and our other video that talks about the entire OC section of the Performance Standards. Thanks for joining us.