



## Stand Up Call Reference Sheet

At the April 4 Stand Up Call, NHSA hosted Heather Wanderski, director of program operations at the Office of Head Start. The content below provides informal guidance in response to questions posed during this meeting.

*Please Note: The Office of Head Start is the authoritative source for questions about all matters related to Head Start grants. NHSA encourages you to communicate frequently and regularly with your regional office.*

## Question and Answer

**Q1.1. If we need to reduce enrollment due to serving more three year olds, do we just need to show reallocation of funds so that the award is not reduced?**

**Q1.2. Right now our program gives priority to four year olds. Due to a lack of adequate space, can we reduce the number of children served and give priority to three year olds? Could we then reallocate the funds to hire other positions needed, such as family service workers?**

A1. Anytime a grant recipient wants to reduce enrollment they must submit a written request referred to as a “Change of Scope” to their regional office. This applies both to grant recipients who are asking for a reduction and requesting to maintain their current funding level and for grant recipients who are requesting to reduce their funded enrollment as well as their current level of funding.

**Q2. Is it better to begin a Change of Scope request sooner rather than later or is it best to place in your continuation grant?**

A2. Begin talking to the regional office as soon as your program begins contemplating a Change of Scope. We have heard from many programs that it can take several months for the review and approval process to be completed. If you are planning to request an enrollment reduction, conversion, or combination of both for the 2022-23 program year—which is only six months away—we encourage you to initiate contact with your regional office immediately.

Based on your conversation with the regional office, you should decide whether to submit the Change of Scope within your upcoming annual (continuation) funding application or if it is in your best interest to submit



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the request as an amendment application to your current grant. Whatever you decide, remember to document, document, document!

**Q3: If you received a reduction in enrollment in the past, can you request another reduction in enrollment if data supports it?**

A3. Yes, programs can request additional reductions on the same grant.

**Q4. Has the requirement to be considered year round for Early Head Start changed from 1,380 hours to 240 days per year?**

A4. The regulation states that an Early Head Start program must provide 1,380 annual hours of planned classroom operations for all enrolled children. The intent of this requirement is to provide ongoing care throughout the year because continuity of care is especially important for infants and toddlers.

However, a program designed to meet the needs of young parents enrolled in school settings may meet the service duration requirements if it operates a center-based schedule during the school year and provides regular home-based services during the summer break.

**Q5. Is there a template or guidance document for a Change in Scope like the one available for continuation or baseline grant applications?**

A5. No, we do not believe a standalone template or guidance document exists for Change of Scope at this time.

**Q6. Can a request be made to extend a grant for more than one year beyond the Project Period? For example, for startup funds that were delayed approval through the 1303 approval process and escalating building costs?**

A6. On the April 4 call, Heather Wanderski, OHS director of program operations, provided the following information: Generally, an extension request cannot be approved, if the request extends beyond one year after the end of the Project Period. There may be some exceptions, if the funds were awarded toward the latter part of the Project Period. You should contact your regional office to discuss if you are in this situation because you do not want to lose funding necessary to complete a task that was approved in your current Project Period.



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**Q7. Can COVID monies that programs were given two years to spend be used for facilities?**

A7. Yes, COVID funds can be used for facilities. Coronavirus Aid, Relief and Economic Security (CARES) and Coronavirus Response and Relief Supplemental Act (CRRSA) funds must be used to prevent, prepare for, and respond to activities related to the coronavirus. Should a recipient seek to utilize these funds for facilities, it must be in connection with prevention, preparation, and response activities around the coronavirus. American Rescue Plan (ARP) funds do not have the same limitations and can be applied to activities carried out under the Head Start Act (as referenced in ACF-PI-21-03).

Depending on the breadth and scope of the project, the requirements of 45 CFR 1303.44 may also apply, which would require a separate application for purchase, construction or major renovation of a facility. At a minimum, if the project was not in the initial application, and the funds were not originally allotted for facilities, a budget revision will be necessary to adjust funding levels to the appropriate object class categories (i.e., Construction and/or Equipment). Additionally, recipients are strongly encouraged to engage with the regional office early in project planning to discuss process, impact on program, and other possible considerations unique to the request.