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U.S. Department of Health &amp; Human Services



Administration for Children &amp; Families



OFFICE OF HEAD START

## Full Enrollment Policy Questions and Answers (Q&As)

The Office of Head Start (OHS) issues the following general guidance on enrollment inquiries related to coronavirus disease 2019 (COVID-19) program closures, as well as specific guidance and flexibilities related to grantees participating in the Full Enrollment Initiative. Given the various stages within the Full Enrollment Initiative, OHS has categorized enrollment inquiries and flexibilities according to each stage of the process. Grantees participating in the Full Enrollment Initiative can reference these questions and flexibilities below.

### General Guidance for All Grantees

#### **Q1. Should grantees continue to report monthly enrollment?**

**A1.** Yes, OHS expects programs to continue reporting monthly enrollment in the Head Start Enterprise System (HSES). During program closures, programs should continue to provide services to enrolled children and families using technology and other creative means, to the extent possible. Even if the program has not been able to engage a family during this time, OHS expects that programs would consider that slot enrolled, unless the family has told the program they will not return. When reporting monthly enrollment, grantees should continue to enter the number of children enrolled on the last operating day of the month.

#### **Q2. Should grantees continue to report their monthly enrollment if services and engagement activities are significantly limited in some areas?**

**A2.** Yes, although centers may be closed, grantees are expected to think creatively and provide innovative solutions for maintaining services to enrolled and eligible children and families, to the extent possible. OHS understands that this becomes increasingly difficult in service areas with limited resources. Grantees who are struggling to find ways to maintain contact and engagement with families should reach out to their Regional Office program specialists for support, and strongly consider becoming part of the [MyPeers](#) community to learn about creative solutions being implemented by other grantees.

#### **Q3. Should programs continue to actively recruit families?**

**A3.** OHS understands the challenges associated with recruiting eligible children and families at this time. Programs are using technology and other creative methods to reach families and continue recruitment activities while prioritizing the staff and community's health and safety. Identifying eligible families now will support reaching full enrollment when operations resume.

#### **Q4. During program closures, can a program enroll eligible children from waitlists, if there are vacancies, even if they haven't been physically present at the center or received one home visit?**

**A4.** Yes, if there is adequate documentation on file to verify a child's eligibility and there are services your program can provide to benefit the eligible child and family. Programs should provide and document these services until operations resume and the enrollment process can be completed.

#### **Q5. What enrollment reporting flexibilities is OHS providing during this time?**

**A5.** During this uncertain time, reported enrollment figures will not be considered in determining a grantee's enrollment status. OHS will continue to monitor monthly enrollment, but will pause its evaluation of under- or fully enrolled grantees until operations resume.

### Guidance for Grantees in the Full Enrollment Initiative

*Questions for Grantees That Have Reported Four Consecutive Months of Under-enrollment*

**Summary:** Any month in which a grantee reports enrollment below 97% is considered to be one month of under-enrollment. Four consecutive months of under-enrollment triggers the Full Enrollment Initiative.

**Q6. If grantees report four consecutive months of under-enrollment, will OHS initiate the Full Enrollment Initiative?**

**A6.** No, OHS will suspend issuance of all initial under-enrollment notifications, effective March 2020, until further notice. Any grantees that have four consecutive months of under-enrollment after March 2020 will not enter into the Full Enrollment process at this time. OHS will reset the counter of consecutive months of under-enrollment in HSES when we reinstate this portion of the Full Enrollment process.

**Q7. When will OHS begin initiating the full enrollment process again?**

**A7.** OHS will resume evaluating which programs enter into the Full Enrollment corrective action period during the next program year, when programs are back in operation. OHS will provide grantees with reasonable notice prior to restarting the count of consecutive months of under-enrollment.

*Questions for Grantees Within Their 12-Month Corrective Action Period*

**Summary:** A grantee begins their 12-month corrective action period after reporting four consecutive months of under-enrollment and receiving an initial under-enrollment letter from their Regional Office.

**Q8. How will OHS monitor and evaluate grantees currently within their 12-month corrective action periods?**

**A8.** During this time, and to the extent reasonable, OHS will continue to provide timely and ongoing technical assistance and collaborate with grantees on their plan and timetable for eliminating under-enrollment.

Review the three scenarios below to understand where OHS is providing flexibilities:

1. If a grantee's 12-month corrective action period ends between February and April 2020 and the grantee reported enrollment at or above 97% in February 2020, they will receive an end-of-12-month letter from their Regional Office. The additional six-month evaluation period will begin at a later date when programs are back in operation.
2. If a grantee's 12-month corrective action period ends between February and April 2020 and the grantee reported less than 97% enrollment in February 2020, OHS will pause the 12-month period and extend each grantee's corrective action period end date when operations resume.
3. If a grantee's 12-month corrective action period ends in or after May 2020, OHS will pause the 12-month period and extend each grantee's corrective action period end date when operations resume.

**Q9. How will OHS address grantees that completed their 12-month period prior to COVID-19?**

**A9.** If a grantee's 12-month corrective action period ended in or before January 2020 and the grantee reported less than 97% in February 2020, they may be designated chronically under-enrolled by OHS.

*Questions for Grantees Within Their Six-Month Evaluation Period*

**Summary:** A grantee enters into a six-month evaluation period after completing their 12-month corrective action period, if they are reporting enrollment at or above 97% and have received an end-of-12-month letter from their Regional Office. OHS continues to evaluate enrollment to ensure the grantee maintains enrollment at or above 97% for six consecutive months. If this is achieved, a completion letter is issued. Inability to maintain at least 97% enrollment may result in the program being designated chronically under-enrolled.

**Q10. How will OHS monitor and evaluate grantees that have received end-of-12-month letters?**

**A10.** During this uncertain time, reported enrollment figures will not be considered in determining a grantee's enrollment status, effective with March enrollment reports. OHS will continue to monitor monthly enrollment, but will not count under- or full enrollment toward the six-month evaluation period at this time.

Review the three scenarios below to understand where OHS is providing additional flexibilities:

1. If a grantee received an end-of-12-month letter in or before December 2019 and reported three consecutive months of enrollment at or above 97% (December, January, and February 2020), they will receive a completion letter from their Regional Office. This completion letter will serve as formal recognition of completion of the under-enrollment improvement process.
2. If a grantee received an end-of-12-month letter in or before December 2019 and has not reported three consecutive months of enrollment at or above 97% (December, January, and February 2020), OHS will pause the evaluation period until operations resume. OHS will continue to monitor monthly enrollment, but will not count under- or full enrollment toward the six-month evaluation period at this time.
3. If a grantee received an end-of-12-month letter after December 2019, OHS will pause the evaluation period until operations resume. OHS will continue to monitor monthly enrollment, but will not count under- or full enrollment toward the six-month evaluation period at this time.

*Questions for Grantees Designated Chronically Under-enrolled (DCU)*

**Summary:** A grantee is designated chronically under-enrolled after reporting enrollment below 97% in either the first operational month following the conclusion of their 12-month corrective action period or at any time during their six-month evaluation period.

**Q11. Will OHS continue to designate agencies chronically under-enrolled?**

**A11.** Yes, if a program completed their 12-month corrective action period in or before January 2020 and reported less than 97% in February 2020, OHS will designate agencies chronically under-enrolled, where appropriate. These programs developed and implemented their plan for 12 months; therefore, OHS will continue implementing the latter stages of the Full Enrollment Initiative.

**Q12. If an agency is currently DCU, will OHS continue monitoring monthly enrollment?**

**A12.** Typically, to receive a DCU removal letter, grantees must report six consecutive months at or above 97% enrollment. Until further notice, reporting full enrollment or under-enrollment will not count toward or against this six consecutive month count. For instance, if a DCU grantee reports under-enrollment or full enrollment beginning in March or onward, neither scenario will impact their consecutive count.

*Questions for DCU Grantees Within the Appeal Process*

**Summary:** If OHS designates a grantee chronically under-enrolled and recaptures slots and funds, the grantee has an opportunity to appeal this decision to the Administration for Children and Families (ACF) within 30 days of delivery of the notice.

**Q13. Will OHS continue with the appeal process at this time?**

**A13.** Yes, if OHS designates a grantee chronically under-enrolled and recaptures slots and funds, the grantee will have an opportunity to appeal the decision. Should the grantee request a hearing as part of their appeal, OHS will schedule the hearing within 60 days following receipt of the written appeal and request for hearing.

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