

Flexibility for Head Start Grantees in Disaster-Affected Areas

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The Office of Head Start (OHS) recently issued [Information Memorandum \(IM\) ACF-IM-HS-19-01](#) addressing Head Start grantees in areas affected by significant natural disasters, such as hurricanes, wildfires, and tornadoes. The IM offers Head Start programs flexibility in a number of operational areas when resuming or modifying their services to meet the needs of affected children and families, particularly those left homeless by the disaster.

A few of the flexibilities include:

- **Eligibility, Recruitment, Selection, and Enrollment:** Grantees may use their overall funded enrollment to serve affected eligible children ages birth through 5 within their overall funded enrollment through Early Head Start or Head Start — grantees are not restricted to their current funded enrollment slots assigned to each program. Any age-eligible child from a family that has had to abandon their home because of the disaster should be considered homeless and therefore categorically eligible. Grantees may also accept signed statements to make eligibility determinations for displaced families that may not have the necessary documentation in hand.
- **Program Options and Duration:** In the event of a disaster, OHS will allow grantees in or near the affected area to serve impacted children in any program option for the remainder of the school year without obtaining prior approval. Grantees significantly impacted by a disaster may also add or reduce hours or days of program operations without obtaining prior approval, as long as the changes can be justified. However, grantees are required to notify their Regional Office of these changes through the Head Start Enterprise System (HSES) as soon as it is practical to do so.
- **Space, Class Size, and Ratios:** Grantees may exceed the Head Start class size and group size requirements found in [45 C.F.R. §§ 1302.21\(b\)](#) (for center-based programs) and [1302.23\(b\)](#) (for family child care programs), and the IM constitutes waiver approval to do so. Grantees must continue to

maintain appropriate adult-to-child ratios and comply with state and local licensing requirements (unless waived by the applicable agency). Grantees may also comply with a state or local square footage requirement that is less stringent than the Head Start requirement during a temporary disaster recovery period. Grantees must notify their Regional Office through HSES as soon as it is practical to do so.

- **Temporary Additional Classrooms:** Grantees may temporarily open additional classrooms to serve displaced children considered homeless due to the disaster or whose Head Start programs have closed due to disaster damage.
- **Recovery Costs:** If necessary, grantees may use funds already awarded for program operations and training and technical assistance to support needed recovery efforts.
- **Budget Modifications:** Grantees may, within a fiscal year, re-budget up to the lesser of \$250,000 or 25 percent of their annual funding between budget categories without prior written approval.
- **Staffing:** Grantees may allow employees to work temporarily from home during the disaster recovery period (for tasks that can be performed off-site). Employees who take on new job responsibilities, such as contacting parents or cleaning up centers, during the disaster recovery period may be paid their regular wages for that work. (Staff or volunteers performing on-site recovery activities should be properly supervised and wear appropriate protective gear.) Grantees impacted by natural disasters may also pay reasonable amounts of overtime to support recovery activities. To allow grantees to retain and recall employees laid off on account of the disaster, OHS will permit grantees to pay employees their regular wages from Head Start funds for up to two weeks if they are unable to engage in their regular employment activities or those related to disaster recovery. Grantees are encouraged to prioritize staff displaced from other programs when hiring new classroom staff.
- **Procurement:** Grantees must continue to follow procurement requirements described in the Uniform Guidance, [45 C.F.R. §§ 75.329-75.335](#), but may use non-competitive proposals (i.e., sole source procurement) for vehicle replacement, equipment, furnishing, materials, supplies, and minor repairs and renovations related to the disaster for up to 12 months following the March 6, 2019 date of the IM. Note that purchases of equipment (i.e., personal property with a useful life of more than one year and a per-unit acquisition cost of more than \$5,000) require prior written approval.
- **Compliance with other Head Start Standards:** OHS will consider waiving a Head Start standard to the extent allowable by law if a grantee is unable to comply as a direct result of a disaster. However, OHS will not waive a standard if doing so would endanger the health and safety of children or constitute fraud or misuse of federal funds.