

New HSE for Children in Agricultural Programs

Glenna Davis: Hello and welcome to the New Head Start Eligibility for Migrant and Seasonal Head Start Program webcast. It is now my pleasure to turn the floor over to our Head Start director, Khari Garvin. Director Garvin, the floor is yours.

Director Khari Garvin: Well, Glenna, thank you so much for that. And hello, everyone. Thank you for joining us today.

I am Khari Garvin, and I'm the Director of the Office of Head Start. And I am pleased to be here with you today to discuss Migrant and Seasonal Head Start eligibility. For many years, Migrant Seasonal Head Start program leaders have advocated for changes to the law to permit more children of migrant and seasonal farm worker families to participate in Migrant and Seasonal Head Start programs.

Our nation's rich agricultural history has always featured the incredible resilience of farm workers and their families. I think we all understand that Migrant and Seasonal Head Start programs take great pride in supporting the legacy of these families and offering new opportunities for future generations.

This new eligibility provision maintains agricultural work as the strong foundation of Migrant Seasonal Head Start programs and provides additional flexibility for programs. The Administration for Children and Families (ACF) recognizes the advocacy of Migrant and Seasonal Head Start leaders, programs, parents, and communities to remove barriers to enrollment in Migrant and Seasonal Head Start programs.

Together we've allowed and supported the Migrant and Seasonal Head Start program in evolving along with the changing nature of agricultural work. This new policy will assist with income eligibility challenges. It will remove some barriers for families and provide programs with more flexibility to serve children that they were designed to serve.

Pardon me. Because you told us your challenges and needs, ACF, that is the Administration for Children and Families, advanced a proposal in the president's budget that now has resulted in expanded Migrant and Seasonal Head Start eligibility. We celebrate this important legislative change with you and want to support you through the implementation of these changes.

We will do our best to answer any questions you may have, and we will do our best to answer those questions today, but please continue to send us your questions and we will make sure that they get answered. I want to pause here, and I want to just take a moment to invite my Head Start colleagues who are with us today to introduce themselves. I'm going to start with you, Tala.

Tala Hooban: Hi, everyone. Good afternoon. Good morning. I'm glad to be here. I am here and listen only today. I'm going to punt to Jess.

Jessica Bialecki: I'm really excited to be here with all of you today. My name is Jess Bialecki. I'm the Policy and Planning Division Director here at the Office of Head Start, and I'm very excited to pass it over to Sandra.

Sandra Carton: Good morning or good afternoon. I am Sandra Carton, and I am the Regional Program Manager for Region 12. I'm thrilled to be here. The day has come when we talk about this, great flexibility.

Khari: Colleagues, thank you for introducing yourselves. Let's talk a little bit about our agenda for today. There are four areas that we're going to cover for the time that we will spend together.

We're going to provide an overview, first of all, of new eligibility provisions for Migrant and Seasonal Head Start programs. We're also going to discuss the implications of new eligibility provisions on Head Start requirements and processes. We're going to share answers to questions that we have received about the new eligibility provisions.

We have 20 questions and answers to go over with you today. And we're going to answer additional questions if we have, remaining time. That's how we're going to spend our time, together today for this webinar. But let me just give a little bit of background. OK. First of all, on March 23rd of this year, President Biden signed what we refer to as the Further Consolidated Appropriations Act of 2024, which provides fiscal year 2024 appropriations for several federal departments and agencies.

And as part of that act, there are changes to eligibility criteria for Region 12 Migrant and Seasonal Head Start programs. This provision in Section 239 specifies that in fiscal year 2024, and every year thereafter, Migrant Seasonal Head Start programs can serve any age eligible child who has one family member whose income comes primarily from agricultural employment as defined in section three of the Migrant and Seasonal Agricultural Work Protection Act, regardless of total family income.

Migrant Seasonal Head Start programs are still required to prioritize migrant families who move multiple times within a two-year period for enrollment. Migrant CISO Head Start programs are still required to annually establish selection criteria to enroll children in their service area who would benefit most from Head Start services.

Now on May 13th of this year, just a month ago, a program instruction, which we sometimes refer to by its acronym PI, a program instruction was published to support programs and the implementation of the new provision. Today we will go over the content of that PI and we will drop the link to this PI in the chat box as well as the registration link for the webinar.

We're going to do that shortly, but more detail will follow in this presentation and FAQs in later slides. OK, this law will increase the number of children of migrant and seasonal farm worker families who are eligible to participate in Migrant and Seasonal Head Start programs. However, it does not increase the number of slots for Migrant Seasonal Head Start programs.

This new law is effective immediately, however, no child who is currently served in a Migrant Seasonal Head Start program should have their enrollment disrupted to accommodate new enrollees who may qualify based on this change. In other words, no children who are currently being served in a Migrant Seasonal Head Start program should be kicked out of the program to make room for new children and families who would qualify based on this change.

Sandra has a lot more to share with us. I'm going to invite her back into the conversation. Sandra, all yours.

Sandra: We're going to talk a little bit about selection criteria. Migrant and seasonal programs are still required to annually establish the selection criteria to enroll children in their service area, who will benefit most from Head Start service. The selection criteria must weigh the prioritization of participants based on needs identified in the community assessment.

You are all familiar with selection criteria. This is just some of the highlights about that selection criteria and how you can use it for, your advantage and the advantage of the families. Taking advantage of this, new flexibility.

Continue, with the subject of selection criteria programs are not required to update their selection criteria, but if they opt to change they must engage in consultation and obtain approval from, their board on the policy council. We already know about many programs are going through the process of, looking at their, selection criteria and, think about what are the changes that they may need.

But as we said, it's not required, you know, that you change your selection criteria. Programs need to continue to include their selection criteria in their annual funding applications. We want to, we will continue seeing what those selection criteria's look like, when you submit your applications.

And migrant and seasonal programs only need to collect income information from that one family member, but may choose to use the total of the family income in selection criteria to prioritize children most in need of services.

It's not a must. You don't need to include all the family income, but you may, if that's going to help you to decide which families should be prioritized and how those prioritizations will play out in your selection criteria.

Jessica: Great. Thank you, Sandra. Wanted to start with that in those important pieces of information on selection criteria, and I'm now going to walk us through a little more of an overview about some of the other implications for coming from these important changes. The Head Start program performance standards on eligibility, we recognize now reflect some outdated requirements.

Because to update the standards, OHS, the Office of Head Start must engage in a formal rulemaking process. In the interim, where there is misalignment or a mismatch between the changes in the statute that were just made in the Further Consolidated Appropriations Act and existing HSPPS, existing standards on eligibility, Migrant Seasonal Head Start programs should follow the new statutory provisions that are in this section 239 of the new law.

There are some areas that have remained the same. Programs must still adhere to age eligibility requirements. Income eligibility requirements have changed, the age eligibility requirements of course have not changed. Per 1302. 13, one of the standards, programs must develop and implement a recruitment process that's designed to actively inform all families within the recruitment area of the availability of program services and to encourage and assist them in applying for admission.

That is a part of the program. ERSI of Eligibility, Recruitment, Selection, Enrollment, and Attendance that has not changed. And then existing enrollment and attendance regulations also remain in place. Some has changed, a lot has remained the same.

The program instruction, and we put a link in the chat to the program instruction, that you can, I'm sure you already have, but that you can read it in detail. It provides details about definitions that are related to these new Migrant Seasonal Head Start eligibility provisions. And we'll also discuss these definitions a bit later when we get to the frequently asked questions but wanted to give a preview to start.

One question that we get a lot is what counts as agricultural employment. And this is a definition that comes from another act. What we mean by agricultural employment is employment in any service or activity included with in the provisions of Section 3 F of the Fair Labor Standards Act of 1938.

And you can see the citation there. Or section 3121 G of title 26, such as the handling, planting, drying, packing, packaging, processing, freezing, or grading prior to delivery for storage of any agricultural or horticultural commodity in its unmanufactured state. This is a new definition that is offered up with this statutory change.

Next slide.

We can go to the next slide.

I think we just need to catch up with the slides. There we go. Other definitions. The definition of family. Importantly, this definition has not changed from the definition that is currently in the performance standards. Family means all persons living in the same household who are supported by the child's parent or guardian income and are related to the child's parent or guardian by blood, marriage or adoption, or are the child's authorized caregiver or legally responsible party?

Do want to flag that the definition of migrant family is now outdated the definition in the standards in part. With this change in the law, now more than 50% of one family member's income, as Sandra said, and Khari said, must come from agricultural employment rather than being defined as more than 50% of the entire family's income coming from agricultural employment.

Looking at least one family member's income. And in this case, Migrant Seasonal Head Start programs must follow section 239, which is that the new law and not the outdated definition in the standards.

Data and reporting. Now, this is a hot topic. For this program year 2023-2024, for the PIR, Program Information Report, that you must complete annually. For question number A13, children who are enrolled in Migrant Seasonal Head Start programs after the passage of the new eligibility law, which was again on March 23rd this year, 2024, those children who are enrolled after March 23rd may be reported under A13E is the response category, and it's eligibility based on other type of need.

Now I know that often this is considered the over income category, but because the total family income piece of eligibility is now no longer part of the eligibility consideration, it is not the over income category. This is a way to report those children who are enrolled in migrant seasonal programs after the passage of the new law as we adjust our systems.

There's no limit on the number of children who are reported in this category, the A13E eligibility based on other type of need on the PIR form for this program year. And then we will update the

2024-2025 PIR to reflect and future PIR versions to reflect changes to migrant seasonal Head Start eligibility policy.

Another big question we get is around monitoring. Recipients who still have, FY 24 monitoring reviews and still have any this fiscal year, those will be monitored according to the changes to the migrant seasonal Head Start eligibility requirements. According to the new law, and then we also want to assure you that the monitoring protocols for fiscal year 25.

The year upcoming and future years will also reflect these changes. The changes, as Khari said, were effective as of the signing of the law on March 23rd, 2024. And our protocols, we have had to adjust as well at OHS and our protocols will reflect those changes.

There are no plans to change the full enrollment initiative, the FEI process for migrant seasonal Head Start programs at this time. As you may know, due to the nature of Migrant Seasonal Head Start programs, enrollment determinations are based on cumulative enrollment at the end of the budget period.

Any Migrant Seasonal Head Start program experiencing under enrollment at the conclusion of the budget period will receive the under-enrollment letter from the regional office, and that's what starts the FEI process. And begins that 12-month period of support of additional support. There are no plans to change that at this time.

Change in scope. Similarly, this new eligibility law, the provision will not impact change in scope applications if they've already been approved and implemented. And, if you have a pending change in scope, you'll work with your regional office to go through that process. We're going to get into some frequently asked questions here, and I'm going to pass it to Sandra, and we're going to do it so you don't hear just my voice.

We're going to, too much of my voice because no one needs that. We're going to do a little bit of back and forth to answer some of the big questions that come in. Excellent.

Sandra: Jess. Let me ask you one question, because I know that people are thinking about this. These questions are going to be published, soon enough in ECLKC. Is that right?

Jessica: Absolutely. Thanks so much for raising that, Sandra. Yes. We are putting together these FAQs, these frequently asked questions, in a single document that's easy to access, and that will be up on the website shortly. And then we also ask that if you have additional questions that you don't see answered here, you can put them in the Q& A or in the chat and we'll record those.

And if we aren't able to answer them live today, we'll make sure that we answer them and get that distributed as well.

Sandra: Excellent. Thank you for that. OK. Let's just start the questions. What are the eligibility requirements for children and families in migrant and seasonal start programs?

Jessica: Yeah, this might be a little repetitive of what Khari shared, but just to really make sure that we drive this point home. Following the passage of the Further Consolidated Appropriations Act 2024, that's the 2020 FY 2024 budget that was passed in March. Thank you very much. Migrant

Seasonal Head Start programs can serve any age eligible child who has at least one family member whose income comes primarily from agricultural employment, as defined, as we said in that section three of the Migrant and Seasonal Agricultural Worker Protection Act, regardless of their total family income.

Sandra: Good, second question. Is this new eligibility flexibility? Equal to categorical eligibility. What is happening right now, is this called also categorically eligible family?

Jessica: Yeah, that's a great question and we've heard that a lot. No, we would not say that this new provision provides for categorical eligibility.

And that's because this new law still requires at least one family member to have more than 50% of their income come from agricultural employment, and it is specific to our Migrant and Seasonal Head Start programs. A lot of other, the, the other, the, the forms of categorical eligibility that we consider like experiencing homelessness or, foster children, those would apply to any of, you know, the regions one through 10, the regional programs.

This law, this eligibility provision is specific for migrant and seasonal, and it does require that at least one family member has more than 50% of their income coming from agricultural employment. So, for that reason, we wouldn't consider it categorical eligibility.

Sandra: Great, because we had a lot of that question coming.

Third question, are programs still required to follow other Head Start performance standards requirements for eligibility, recruitment, selection, enrollment, and attendance, what we call the ERSI requirements? Meaning do we still have to follow ERSI.

Jessica: Yes, ERSI has not gone away. And while this new law, as we were saying, changes income eligibility requirements or some of them.

You still have to show that at least one parent or sorry at least one family members income comes primarily from agricultural employment. But while that has changed other standards for eligibility recruitment selection enrollment and attendance do remain in place. Another big one to read completely off the slides, but just to highlight a few still have to adhere to the age eligibility standard.

Programs must still develop and implement a recruitment process programs are still required and as Sandra pointed out and emphasize before to annually establish selection criteria to enroll children in their service area, who would most benefit from Head Start services. That selection criteria, very importantly, is still in place.

And existing enrollment and attendance regulations as listed on the screen also remain. Now I want to emphasize that if programs have any questions about whether an existing requirement in the performance standard still apply, please reach out to us, and we have the email address that is specific for Migrant and Seasonal Head Start policy on the screen.

It's MSHSHHeadStart@ACF.HHS.gov. Please take that down. There are real people who are on the other side of that email comes directly to my team. And we'll make sure that, to respond.

Sandra: Question number four. What if they, start performance standards are now in conflict with the statutory change in migrant and seasonal start?

Jessica: Great question. The way that sometimes our statutes and our regulations work is, our statute is law, but our regulations may need to catch up a little bit.

Due to the statutory change, the standards on eligibility do now reflect some outdated requirements. And to update them, we have to engage in a formal rulemaking process. In the interim, where there is misalignment between the new law, the Section 239 of the Further Consolidated Appropriations Act is the technical title and our existing performance standards on eligibility, Migrant Seasonal Head Start Program should follow the new law, the Section 2 39.

Again, as an example, migrant seasonal programs no longer need to adhere to all of the income eligibility requirements under 1302 0.12 C or to those eligibility requirements. However, programs are still required to verify eligibility, under 1302 0.12. F based on the income of at least one family member, coming primarily from agricultural employment.

Not the entire, not looking at the entire family income, but on at least one family member's income coming primarily from agricultural employment.

Sandra: Question number five, and this is a very important question because our programs, always have had this income piece that not necessarily happens with other regional programs. The income, anything that has to do with income is very important. Do migrant and seasonal programs still need to collect income information from families?

Jessica: Yes. This is a really great question. Yes. Migrant Seasonal Head Start programs, it's a yes and answer. Yes, Migrant Seasonal Head Start programs are still required to collect income information for one family member to verify that more than 50% of that family's family member's income comes from agricultural employment.

However, migrant seasonal programs are no longer required to collect the family's total income for the purposes of eligibility. To determine who is eligible in that, I think of it like an eligibility pool of eligible families and they do not need to collect the total income. Now, if a migrant seasonal program decides at its discretion to use family income as part of its selection criteria to support making determinations regarding families most in need.

To prioritize enrollment, then, you know, it should, in order to do that, collect and maintain family information, income information only for the purposes of its own selection criteria that the program has determined. Total family income will not be required for eligibility determination, verification, or record keeping.

It is not the total family income is not required for eligibility. It could be required for selection criteria if the program makes that part of its selection criteria.

Sandra: Excellent. OK, question six. Following this new statute, are migrant and seasonal programs required to update their selection criteria?

Jessica: No, they're not required to update their selection criteria in response to this new law. Programs may choose to update their selection criteria. We know programs know their communities best and develop selection criteria alongside their policy council and governing body to make local decisions on enrollment priorities so they can continue to serve families who would benefit most for Migrant Seasonal Head Start services.

Now, important to note that Migrant Seasonal Head Start programs are still required, to prioritize migrant families who move multiple times within a two-year period for enrollment. That piece is still in place.

Sandra: We have the next slide. Waiting for question number seven.

Very good. OK. If a program chooses to update their selection criteria, because they do have a choice. If they choose to update the selection criteria, do they need to get approval from the regional office to make the change?

Jessica: No, it is not required for programs to get approval from the office of Head Start regional office to make a change to the selection criteria.

However, it is absolutely critical that programs must engage in consultation with and obtain approval from their governing body and policy council, as you would anytime you make a change. Once those approvals are obtained, the program can begin using the updated criteria. And now I do want to say programs are highly encouraged to reach out to their program specialists to help support the process and answer questions they may have.

And very importantly, all programs must include their selection criteria in their annual refunding application. It doesn't have to be done in response to this change. Selection criteria and updates must be included in the annual refunding application.

Sandra: Very good, Jess. OK, question number eight. How does this new provision impact the over income eligibility allowances for migrant and seasonal programs?

Jessica: Great. The over income eligibility allowances for migrant seasonal programs are no longer a consideration. Since Family income level is no longer or any income level is no longer a factor in eligibility.

With this change in the law, income level is no longer a consideration for eligibility, and a child is eligible for Migrant Seasonal Head Start if at least one family member has more than 50% of their income coming from agricultural employment, regardless of the income level. For eligibility, the over income eligible, the over income allowance no longer apply.

Sandra: And that's what makes this new law so awesome. Agreed. Question number nine. How does this new provision impact categorical eligibility? Which are the families who receive public assistance or are homeless or have children in the foster care system?

Jessica: This is a great question. Migrant Seasonal Head Start programs, as we said, can now serve any age eligible child who has at least one family member whose income comes primarily from agricultural employment.

Regardless of their total family income, or of the income level of that, that one family member, and this couldn't this could and should include families who receive public assistance, are experiencing homelessness, have children in foster care, but it's important to note that in all circumstances, one family member must have more than 50% of their income coming from agricultural work to be eligible for Migrant Seasonal Head Start program specifically.

That is what this, this program, this part of Head Start, the intent behind it. And as we've said, programs are still required to annually establish selection criteria for enrollment purposes to prioritize which families and children to enroll and look at those children and families who would benefit most from Head Start services.

And when they're making when you're making those selection criteria decisions, you very well may, include prioritizing families who receive public assistance are experiencing homelessness or have children in foster care. And then I also do want to mention that it is still required to report data on those groups of families in section C of the PIR form.

Because we, you know, collecting data on those groups of, of children and families can help inform other parts of the Head Start program and the services we provide, it is still very important to gather that information and to report that data, on those groups, of children and families.

Sandra: Very good. And you mentioned this before, but I think it's worth going through this question again because it's different of what we have been doing in the last few years in the last performance standards, which we allowed programs to find their own definition or make their own definition choose from different sources.

This speaks to, what is the definition of agricultural employment that now is part of this, law.

Jessica: Yeah, very important point, Sandra. This is specifically spelled out in the statute. There are some areas where, you know, you have some detail in the statute and then we offer our own interpretation.

This was very specifically included in the new law. The definition of agricultural employment is quite specific here. And it is, employment in any service or activity included within the provisions of section 3 F of the Fair Labor Standards Act of 1938. Or section 3121 G of title 26, and that includes the handling, planting, drying, packing, packaging, processing, freezing, or grading prior to delivery for storage of any agricultural or horticultural commodity in its manufactured state.

I really want to specify that we have links in the PI to, to that definition as well, but that is included in the legal definition as stated in the statute. Now in accordance with current practice, programs should apply this definition consistent with their community needs assessment and their selection criteria.

Sandra: Question 11. How does the new statute define one family member?

Jessica: At least one family member must meet the definition of family as defined in the performance standards. That, definition will not be changed by this new law. Family means all persons living in the same household who are supported by the child, parent, or guardian's income.

And are related to the child's parent or guardians by blood, marriage or adoption, or are the child's authorized caregiver or legally responsible party. And it's important to note this definition of family applies across all of the Head Start programs. It's what's used by all regions. And again, this definition has not been changed by the new law.

Sandra: Question number 12. Are migrant families still prioritized in the new statute?

Jessica: Yes. As emphasized, it was actually emphasized in the new law, but it is not new. But as emphasized in the new law, a Migrant Seasonal Head Start program is still required to prioritize migrant families who move multiple times within a two-year period for enrollment.

Now, the definition of migrant family is now outdated. In, at least in part in our standards. As we said, a migrant family no longer needs to have a family income as a whole that comes primarily from agricultural employment. Rather, they must have at least one family member whose income comes primarily from agricultural employment.

And it's important to note that we operationalize that, like what that means in, in kind of real talk, is more than one, more than 50% of one family member's income comes from agricultural employment.

Sandra: Question number 13. Does this mean families newly, newly eligible for migrant and seasonal programs are guaranteed placement in a Head Start program?

Jessica: No, eligible applicants, everyone in that pool of eligible families and children are not guaranteed enrollment at a, at a program. In accordance with our, our current, our regulations, and as we've said, Migrant Seasonal Head Start programs are still required to annually establish selection criteria that takes that eligible pool and enrolls children in the service area who would benefit most from Head Start services.

Weighing the prioritization of participants, again, really based on the community needs assessment, which will be different for each program.

Sandra: Question 14. This new law is significantly increasing the number of children who are eligible in our community. Will we receive more funding to serve additional slots?

Jessica: We offered a lot of the good news about the change. I will have to say no to this one. There's no additional funding attached to this legislative change.

This was a legislative change without additional funding attached to it. We do hope that by providing the option of expanding eligibility to more families, that it gives flexibility to Migrant Seasonal Head Start programs based on their community assessment to better meet the unique needs of children and families in their service area.

Because programs are required to fill any vacancy within 30 days, programs need to have an active and maintain an active waiting list to serve families as soon as possible if a slot becomes available.

Sandra: Question 15, how will programs report children's eligibility in number A13 in the PIR?

Jessica: As we said earlier, but just to really reinforce this because I know it's PIR season, for the 2023-2024 program year that we're currently in, for question A13, Children who are enrolled in migrant seasonal programs after the passage of the new eligibility law on March 23rd of this year, they, sorry, there's a typo on there, but they, may report it, there's a couple of typos, but may be reported under A13E, which is eligibility based on other type of need.

There's a category, often referred in the past as over income. We're not referring to it that way anymore. Right now, we're saying it's a category that can be used for Children enrolled after the change in the law, a 13 E and there is no limit on the number of Children who can be reported in this category on the PIR form.

Sandra: Question. 16 How will these new provision impact programs in the full enrollment initiative?

Jessica: I know that we covered this before, too, I'm not going to read the full thing, I'm hoping we can get to answer a few of your questions live that have been put in the Q& A. But at a high level, there are no plans to change the full enrollment initiative or the FEI process for Migrant seasonal Head Start programs at this time.

Sandra: And this question referred to another of our initiatives. In this case, change in scope. Will this new provision, in fact, change our scopes applications?

Jessica: No, this new eligibility provision will not impact change in scope applications that have already been approved and implemented. If you have questions about one that's currently pending, of course, reach out to the wonderful team that Sandra leads in the regional office.

Sandra: Question 18 we're going through to see if we have some time to, you know, give you opportunity to talk about some other questions that may have been in the chat. How will these new provision impact monitoring, which is very dear to everybody in the audience.

Jessica: We are going to update our monitoring processes and protocols.

If you have an upcoming monitoring review, whether that's in fiscal year 24 or for next year or beyond, those monitoring reviews will be monitored according to the changes in this eligibility law.

Sandra: Very good. Number 19. How long does this new income eligibility provision last?

Jessica: This one I get to give good news on, which is that it applies this fiscal year and for all future years, as was specified in, in the law that was passed.

Sandra: Very good. Yay. I see some celebration, celebratory, things coming up.

And the last question, does this new eligibility provision apply to non-Migrant and Seasonal Head Start programs who serve migrant and seasonal farm workers families? 50% of our programs are also regional programs. This is a very good question, especially if you are handling more than, one Head Start programming in, in our case, Migrant Head Start plus, may be Regional Head Start.

Jessica: Yeah, excellent question. Know that many of our agencies have both. This law is specific to Migrant Seasonal Head Start programs in region 12. If there is a migrant or seasonal farm worker family who's seeking to be served in a non-migrant seasonal Head Start program, whether that's in the same agency as Sandra said, you know, an agency that may have, a, migrant seasonal and a non-migrant seasonal program, if they are seeking to be served in the non Migrant Seasonal Head Start program, Regions 1 through 10, they must adhere to kind of the standard eligibility requirements, which are those outlined in the regulation at 1302. 12.

Sandra: Thank you, Jess.

Jessica: Yeah, I'm looking we have a few minutes left, and I see that there's been some additional questions raised in the Q& A and I appreciate those please keep them coming. I love answering questions, I'm going to look at some of those now and try to pull out some that I think maybe we haven't answered already or that feel, easier to answer, and broadly applicable in this, in this setting.

But please do trust that if we aren't able to answer a question live, we are recording this and we will, we will make sure your questions get answered. But I'm going to kind of start up at the top, and actually before I do that I do want to point out, there was a typo on one of the slides around the email address.

And I actually then said it wrong. The email address to contact us is MSHeadStart@ACF.HHS.gov. And it's in the chat now, but please use that one MSHeadStart. I'm seeing, let's see. Would income coming primarily from agricultural employment, does the yearly amount matter? I think that's a really good question.

And the person, said if a mother works two months picking cherries and made 3000 yearly, is this enough to qualify where it is 100% agriculture? I hope I'm interpreting this correctly, but the level of the family member who's working in agricultural, the level of their income does not matter.

It is the percent that is coming from agriculture. If they are working two months picking cherries and what they earn during that time is more than 50% of that family members total income, then that would make the child eligible so it is about that 50%, more than 50% coming from agricultural employment, not the level or the amount of the income.

There are some questions about who qualifies as family member. I do want to return back to that. We are using and Catherine, if it's not too hard to pull that definition back up on the screen, that'd be great. Otherwise, I can certainly read it. But the definition of family member has not changed.

The definition of family member is still about one, all persons living in the same household who are supported by the child's parent or guardian's income. And are related to the child's parent or guardian by blood marriage or adoption or are the child's authorized caregiver or legally responsible party, and you do need to use that I know there's a lot of scenarios that come from that and we've gotten a bunch of them.

And really want you to turn back to that definition. When you have a question, when there is a question about, especially a non-parent, and whether that constitutes a family member for purposes of eligibility, they need to be living in the household, and supported by the child's parent or guardians' income and be related.

We've gotten a question around a two-parent family. I see Sarah had, and the mother works and non-agriculture, but the father works in agriculture and moves for work. Our interpretation I will answer that one. We interpret that to be, they don't have to be in the household 100% of the time.

If the father is moving but working in agriculture, but still considered part of that household and is obviously the child's, related to the child, by blood, or marriage, or adoption, or is the child's authorized caregiver, that father, that parent would count as working in agriculture and thus, count for the purposes of, of eligibility.

I see a great question from Claudia, for PIR purposes, are we still going to report over income? And they asked about, like, between, 101 and 130% of the federal poverty line. For the purposes of eligibility on the PIR, you, for children enrolled after the change in, in the law, those children may be reported as other in for that A 13 E category as, other eligibility, meaning other eligibility, criteria.

You do not need to, or sorry, eligibility based on other type of need. You do not need to report the number that are specifically in that 100 to 130% because the overall family income level, no longer, matters for the purposes of eligibility.

That's related to the PIR now separate from the PIR and eligibility, like we talked about for your selection criteria, programs may choose to prioritize children who are at certain levels of family income and that is at your discretion. With alongside your governing body and your policy counsel, but that is different than, you know, requirements that are eligibility requirements and data collected by the Office of Head Start.

Now I do want to make a point again about the PIR that there are groups such as families receiving public assistance, families experiencing homelessness, foster children, who you are still required to collect information on the number of those families that you serve, that you can share that data back with us, and most critically, use that to inform the services your program provides. Let's see. I think there are other questions. I know we won't have time to do all of them and we're coming up on time. OK. I think we may have to close it there for now. I just want to acknowledge that I do see other questions in the chat. And I'm one who always likes to answer all the questions, but I promise you we will read them, and we will respond. I do see questions about best practices for documenting income if someone's doing so for selection criteria and I think that's a great area that we've heard programs asking for TA around, and would be very interested in, you know, having programs share best practices around as you work to implement these new requirements, and, you know, some may make changes to selection criteria.

And I see some specific kind of scenario-based questions around family members. Again, I just I do want to point you back to the definition of family in the performance standards that has not changed.

With that, I'm going to go to the next slide to help close us out. We have the correct email address up on that slide. If you have more questions, if you put them in the chat or in the Q& A, trust that we will, we do have those. We've grabbed those. You don't necessarily need to send those to us again, though you're always welcome to.

But if you have other questions that you haven't brought up, and that you're thinking about later, please do feel free to reach out to us. Real people, my team is on the other end of this email, and I'll

pass it over to maybe Khari and Sandra, whoever wants to close this out. Go for it. Heard enough of my voice.

Khari: I think Sandra is more than capable. Sandra, please close us out.

Sandra: Thank you so much for all of you. We know programs right now, are very busy. This is agricultural season. They're trying to get their heads around all these new things, new law. And interpretations that were given them on and we really appreciate the time that you spend with us today and before today.

Many of you that participated in the let's talk about it session. These are kind of things that we need to talk more. We don't learn everything with one conversation. We encourage you to talk among yourselves to talk with your directors and ERSI. People within your programs and continue reading these, pieces of information.

You have to read them. If you're like me, you have to read them more than once to make sense of things and make the connections that you have to make in order to make the right decisions for your program and your families. Thank you so much for sending questions or being active, trying to figure out how this is going to help you, this new law and for celebrating with us.

This great, statue that is going to definitely help all of us and all your programs to, you know, to find more families to serve. Thank you for the time. Thank you to the Office of Head Start, Jess, Carrie, and all the people involved in developing these materials. And until the next time, have a great day.