

Final Rule on Head Start Eligibility Webcast

Colleen Rathgeb: So, let's get started. So, if we turn to the first slide. We start the Powerpoint, please? So, the final on eligibility, as folks know, was published in the Federal Register on February 10th and so, on the next line you'll see that the effective -- that means that the rule was effective thirty days after it was published. So, it was effective as of March 12th -- so about a week from now it will mean that for children for whom you determine eligibility after March 12th, you will need to follow the rule that we lay out in this rule. I want to clarify that you do not need to redetermine any children's eligibility that you have already determined children that you have already enrolled. or that you have already made those eligibility determinations; they're already on their waitlist; they've been enrolled in the future.

So, this again is for children that you determined their eligibility after March 12th. We will not -- I know some programs are having their ERSI reviews coming up in the near future. We will not be looking at the way you're determining eligibility in being in compliance with this regulation until next fiscal year -- so the 2016 fiscal year. So, what does this rule do? This rule essentially gives a clear -- we hope and we've had in the past -- roadmap for program for how you determine Head Start eligibility.

In the past, there were parts of the eligibility process that were in the Act, there were parts that were in our regulations; and there were some places that we had to clarify more in policy guidance and in other pieces. And so we were hoping that by redoing this on part of the regulations this one part of the current 1305 we could give programs a clear view of all the different pieces on eligibility.

So, it talks about the process they have to go through the documents that the programs can accept, so that families can show that they're eligible; and newly required programs to retain records about that eligibility; and to make sure that staff are adequately trained to make sure they're doing those eligibility determination processes correctly. So, we'll talk next about what the new provisions in this new rule are. So if you move to the next line?

I want to start by reiterating most of the provisions that are listed in this new rule that you see that we have laid out -- the whole new 1305.4 -- most of them reiterate current requirements that are already in the Head Start Program Performance Standards, or that are already in the Head Start Act and have been in effect since the Head Start Act was passed in 2007.

There are a few new provisions in this final rule and we'll focus more on those. But we also want to take this opportunity to just walk through the full eligibility requirements. 'Cause sometimes there in the act of change or things that are confusing. And so, I guess the bottom line is: This rule doesn't change a lot, but it does change some important things. So, as we'll talk through we'll make clear that if an in-person interview is impossible, programs can do interviews with families over the phone. We lay out what needs to be in an eligibility determination record. We make it clear that certain homeless children -- they're categorically eligible, and you need to be able to serve those children without creating barriers that they might lack documentation on things like immunization.

We allow for some written declarations for families that cannot document through the more standard pieces of verification paperwork. And on the next slide, we also talk about how you can verify things through third party, if that is something parents consent to which is very important and that makes sense, given the circumstances. That we make sure that programs have policies and procedures when there are either actions by staff that knowingly or actively try to violate the regulations, and that there's training adequate training for staff and governing bodies in what's required around eligibility and the eligibility verification process.

The next slide will talk about some of the new definitions that were added. Both in the proposed rule and in response to the many comments we've received, we added some definitions to make it clearer for programs what exactly our terminology means. So, both the difference between being accepted and actually enrolled. So, we have a new definition on enrollment being tied more to actually the provision of services. We add a definition of foster care. We've already gotten some questions about that and we'll talk about that a little bit. We put in the regulations the definition of homeless children. And I want to be very clear around the importance there.

So, in 2007 the Head Start Act said for the first time that homeless children are categorically eligible, which means they are eligible, regardless of any other family circumstances, income, anything; they are eligible for Head Start services. And they require that Head Start use the definition of "homeless children" that is in the McKinney-Vento Homeless Assistance Act which is around the education of homeless children.

So I want to make sure -- we have up on the ECLKC a number of training and technical assistance opportunities for eligibility for staff that work with families or determine eligibility to make sure people really understand the McKinney-Vento definition of "homeless." Because it's broader than what people may think of when they think of "what does it mean to be homeless."

So, just a moment here on it. The McKinney-Vento Act says homeless children, defines homeless children as "children that lack a fixed, regular and adequate nighttime residence." And includes children who share housing with other persons -- Like if there're two families doubling up due to loss of housing, economic hardship or similar reason; they're living in motels, hotels -- could be trailers or camping grounds -- due to the lack of alternative accommodations; or living in emergency or transitional shelters or abandoned hospitals; or awaiting foster care placement; they have a primary nighttime residence that is a public or private place not designated or ordinarily used for regular sleeping accommodations.

Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations or similar settings, and migratory children who are living in circumstances described above. So, it is something that we want programs to make sure that they are both understanding the category eligibility of any children that meet this definition and also -- which is not the subject of today's webinar -- but thinking about how do they really make sure that they are actively recruiting and making clear the availability for Head Start programs for those kids.

We also add a definition of Migrant and Seasonal Head Start programs. and a number of more technical participants, the time period and verify. We also have revised the definition of enrollment -- again, talking about making it clearer that they've actually begun to receive services; revised the definition of family and Head Start eligible. On the definition of family, I want to make it clear that the definition of family as related to a child, really has not changed. And, we did try to, in this regulation, clarify that a pregnant woman can also make up a family in and of herself. And in doing that we have gotten a number of questions, since the reg came out, about whether we had changed the requirements around of how we verify the income for teen mothers. And we have not.

There is nothing in this rule that is changing the way that we look at income or family for teen mothers. And so, to the degree that we have a longstanding practice around teen parents, looking at the income of the teen as opposed to the broader family unit, that was not changed in this rule.

So, let's go on to the next section on the process overview. We want to spend of few minutes here, going through just outlining the steps that staff must take to determine whether a family is eligible for Head Start services. Again, some of this, most of this is not new. some of this is new because of what's in the regulations. And we'll start with the in-person interview.

So, we lay out in the rules that the staff must conduct an in-person interview with each family, unless -- on the next slide -- we make it clear that we've heard clearly that this is not always something that families are able to do or that programs are able to do. Whether it's because they're in very rural areas. Whether it's difficult to get families in. And so, we've made it clear in the regulation that you can do this over the phone or through another method if a family isn't able to come in. The next step is making it very clear that -- not that programs haven't done this before or folks haven't expected this before -- that you must verify the information that families give you.

So, you -- we need to make sure that people are giving us information. Again, we're not expecting programs here to be able to be detectives, to figure out if there is something; but, we want programs to make -- the staff is responsible for verifying that you're getting information that is accurate from programs. The next big step I think that is different here is that we're making it clear -- and again many programs have already followed these processes -- but that we have an eligibility determination record.

So, we have it clear that we understand why the staff believes this family is eligible. What is the documentation that they looked at and verify to determine that they are eligible and that they keep that documentation, so that we're able to understand, again, the process of how was this family determined to be eligible and we were able to look at that after the fact.

So, in the next slide we talk about what the eligibility determination record includes. So, it includes copies of that documents you use to determine eligibility, and this is one of the key changes in the reg. in the past, we have said that programs have to look at documents but did not have to keep those documents. we are now saying that programs must -- if you looked at a W-2, if you looked at paystubs, if you have a self-declaration or a declaration on a third-party verification -- you need to have that, so that it can be looked at in monitoring; it can be looked at if other folks were to question that eligibility determination decision.

So, again staff must make a reasonable effort to verify that information, and they must identify: How did they determine that they were eligible? Were they categorically eligible? Were they income eligible? And the next slide shows a form that many, many programs I hope, many folks looking at this -- it looks a little small on my screen and it may on yours as well -- but, we had Head Start Eligibility Verification form that we have not required, but we suggested that programs use in the past. It is in the government-speak an OMB approved form that programs can use to show how: Were the child eligible because they were in public assistance; they were in foster care; they're homeless; they were below the income threshold.

What kind of documentation did you use to determine that? And, who was the staff that looked at it and how, and again were they eligible? So, this is a form that's still good; it meets the requirements of the regulation if programs use this this can be a key part of their eligibility record that lays out: How did they determine that a child was eligible and then you would now also have to keep the documentation. after the fact to show that this is what you looked at and here it is. the next slide just lays out the eligibility requirements. So, again these are not new.

We try to be clearer in the reg of what -- putting it all in one place for Early Head Start and Head Start and then, Migrant and Seasonal, which can serve across the age spans. So, Early Head Start -- they must be an infant-toddler and younger than 3. Head Start -- you want children to be 3 or to turn 3, by the date they are eligible in public school and not be of compulsory school age. when we get to some Q-and A's at the end -- we've gotten a number of questions here when we laid this out. "Does this mean that if a state had they're compulsory school-age not until 6 or till first grade that we would be having lots of children in Head Start and not in kindergarten?" And, again this is not change and absolutely not. Like we have left -- we have very unusual circumstances when a third year in Head Start perhaps, or Head Start placement, when the child would normally be in kindergarten makes the most sense. You often, if a child is not on an IEP, and that is what the determination of the agency that runs IDA as well as the Head Start program that believes that there could be the best placement here.

We allow for that possibility; it is absolutely an extremely rare occurrence. But, again this is just codifying what has been the practice -- not anything new here or in any way changing the expectation that the vast majority -- nearly all children -- would be in Head Start only until kindergarten eligibility in the state.

So, the next slide we lay out again -- so you have to be age-eligible. I guess let me flip back to the slide for one minute. I do want to say one thing around the age-eligibility. We do say you need to verify that the child's age is eligible. We do not require that children have a birth certificate; nor do we require that people keep birth certificates in the files. So, we do not think that it is a major problem in the Head Start program that children are trying to get in at a younger or an older age. And so, we very much want to make sure that any verification of age eligibility does not create a barrier to programs, to parents and to families, particularly to families who may be more vulnerable and less likely to have the documentation of the child's birth certificate to bring in -- so very clear that that's not a requirement.

So, then if we do income eligibility -- a family is eligible based on income. The way we kind of group the eligibility, the way you can get eligible in this reg is that you are -- your income is equal to or below the poverty line or your family is on public assistance. And we're not changing anything about the public assistance being something that automatically gets you eligible. It is just grouping it with income, the way the Act, the statutory requirements group the income and the public assistance into one category. So we assume that anyone eligible for public assistance is also essentially poor and then, and so we consider them income-eligible. What do we mean by public assistance? We do not define in the rule public assistance, but we do make it very clear in the preamble of the regulation -- which we encourage folks to read, if they have not -- that longstanding practice in Head Start and consistent with the guidance we put out: Public assistance. we mean TANF or SSI.

We do not mean food stamps or what's now called SNAP or medicaid or other public benefit programs that have significantly higher income threshold than Head Start or TANF. and so again we mean TANF or SSI when we talk about being eligible for public assistance. The next slide makes it clear that programs longstanding have had the ability to enroll up to 10 percent of their from over-income families. so folks have always, this has been a longstanding allowance that there are programs that are needy and that meet your selection criteria whether that's because the child has a disability or the family has another very vulnerable circumstance that they -- while their income is above the threshold - they really are a needy family that would benefit from the service and as a longstanding practice of the program may enroll up to 10 percent of such families in their program.

We put and we show on the next slide that we have -- we codify here in the regulation what has been in the act since late 2007 -- that programs now have the ability to enroll an additional 35 percent above that 10 percent of families that fall between to 100 to 130 percent of poverty only if the program implements outreach and enrollment policies to insure they're meeting the needs of children, pregnant women and children otherwise eligible; so, that means poor children, homeless children, children in foster care -- if they really have shown that they are trying to reach those families and enroll those families and that they still have excess enrollment slots and they establish criteria that insures that those eligible pregnant women and children, homeless, foster care, poor are served first.

So, we go to the next slide we show what they actually have to do. So, if a program wants to enroll an extra 35 percent of children in this 100 to 130 range they have to be able to report how they're meeting the needs of the eligible families; that's the homeless families, the children in foster care, the children in public assistance that are poor -- how they're enrollment and outreach policies and procedures: What they are, that they've made efforts to be fully enrolled with the otherwise eligible families, that their selection criteria gives priority for those families; they show their enrollment before -- that they also show the number of pregnant women and children are served. And they are able to document the eligibility criteria for all the children on their waitlist.

So, in this regulation we don't prescribe how programs must report on that, but we do that maybe think that we request in refunding application and maybe think that we request on monitoring. But again if a program wants to use this flexibility, they really have to be able to document how they have shown that they're doing everything to meet the needs of otherwise eligible families first.

The next slide talks about an additional allowance that has longstanding been in the Act. and again where somewhere where this regulation is not making new policy, but really trying to codify everything that is already been out there -- that tribes and actually tribes and other very rural isolated communities have the ability in the Act to fill more than the either 10 percent or the additional new flexibility with families that exceed the income guidelines, if a majority of their enrollment -- which we've always defined as at least more than 50 percent, so 51 percent -- is income or categorically eligible. and this generally [inaudible] for both tribes and for very rural isolated communities where you may not have enough families that are in the -- actually meet the low income to fill a classroom.

And so, wouldn't you -- if you already have the teachers there -- wouldn't you want to be serving more children that could benefit from the services, even if they are technically slightly above the income categorizations. So, this again isn't new policy; it's just putting what been a longstanding allowance in the ACT into our regulation. The next slide starts talking about the categorical eligibility requirements

So, we have both income which is again actual income, the above income requirements and children eligible for public assistance. And then we also have categorically eligible regardless of the income. If a child is homeless or a child is in foster care, they are eligible for Head Start.

So we have definitions both of homeless; again, we talked about this at the beginning of the webinar: This McKinney-Vento definition of homeless which is slightly broader, than some other definitions of homeless might be and that a child is in foster care. and so both -- given the particularly vulnerable populations that both are [inaudible] in foster care, we think it's incredibly important that Head Start programs are able to serve both, without the documentation needed to prove the income eligibility or even the income itself.

And then, the next slide talks about the -- and again this is not new, but we're codifying here in the regulation -- that a child's only eligible for Migrant and Seasonal Head Start if they are either income or categorically eligible, and then, also that they can show that the family's income comes primarily -- again, meaning from more than half -- from agricultural work.

So, the next slide begins to outline how you have to verify; so again there is -- we have had an existing regulation that they must look at W-2s, pay stubs, pay envelope, other information that's relevant for the family. We make it very clear. We've had a policy of accepting written declarations, when that is not something -- they can't document in any of those forms; we make it clear in the regulation that you can accept written declarations, particularly when the family said they have no income to report.

So, that is something -- or again from third parties. So we try to be clearer than we are on the current regulation that there are alternate methods to be able to make those verifications. Similarly, from the next slide we talk about verifying categorical eligibility and we lay out the type of documentation it can be. So, you may be able to produce a court order or another legal document such as a payment for foster care or a written statement from a provider from school personnel, from another official, or quite frankly, some other document that can prove that someone is categorically eligible.

Particularly, on the next slide we talk about the verification of homeless families, and we want to be clear that there be no legal document or provider to document that. And again given the broad definition of homeless that we are -- have in the Act [inaudible] we want to make it clear that a family can declare that it is homeless in a written statement and the staff would just need to describe that they talked to the family, that they describe the living situation: They're living with their family member at this time -- explain the situation.

And so, that we will not always have -- in many cases we will not have a more formal document to be able to prove that. So, that finishes the verification procedure. And then, we want to clarify, because it was in a section of the regulation before, we clarify a child is eligible -- that once a child is declared eligible, they're eligible through the succeeding program year for Head Start. For Early Head Start, we already had in another section of our regulation, not 1305.4 -- that for Early Head Start that you eligible for the duration of the program. But it's clear here for Head Start that you're eligible for the following program year.

And so, again, these eligibility determinations are only new for programs that are newly eligible. We do not want families to determine eligibility between a 3-year old and a 4-year old in a year at Head Start. This is only for determinations made after March 12 of 2015. Another new requirement is that there must be training of staff to include information on how to collect, methods to collect information, strategies, and explaining program policies and procedures. We need staff understand that verifying eligibility is serious, is important. To the degree that we have uneligible children enrolled in Head Start, it means that children that are eligible and that should be benefiting from the program are not.

And so, we think that it's important that staff understand the seriousness of this process of verifying eligibility. And the next slide talks about the timeline we need to do that training in. So, for management and staff that training needs to be done within three months. and, for government body and training council that training needs to be done within six months.

The next slide is also about a new requirement that programs must have policies and procedures that include what actions the program would take against staff who intentionally enroll ineligible families. We think this is rare. We think programs do not want to be enrolling ineligible families, because most programs have long waitlists of eligible families waiting to enroll. So, this is not that we think that this is a common occurrence.

But, we do unfortunately know that it has happened and it is a problem. So we want to make sure that staff and programs understand that the seriousness of this and so that they have policies in place, if there are programs that unfortunately violate those basic premises.

So, basically as kind of a recap here -- we have that adorable telephone child on the screen there -- we really think this regulation reinforces Head Start's mission that we are supposed to be serving the children that need Head Start services most-- and the most vulnerable and needy children and we really think that making sure that we are doing a good job of making sure that kids are eligible is extremely important; we hope that this both streamlines and also strengthens the procedures we use for that and makes it easier that programs can see it all in one place, and better aligns Head Start programs with the practices that are in the field. So, again, we think that most programs are really, actually already doing this -- most of these things, both because of the form that has been longstanding out and because most of what is in the final rule is really what was laid out in this proposed rule that came out a number of years ago.

So, I think we're going to go on now. And I would just like to pull just a couple of questions that we heard from the field. We've gotten a lot of questions since the rule came out. We're really glad to hear that. It's always never as clear as we hope things are, when we put out something like this. And so, we're glad that get so many questions. We're also collecting questions right now during the webinar. And so questions we will be able to put out comments and questions back for those within the next couple of weeks. I don't know exactly timing on that, but if you send your questions in, we will put those out on the ECLKC, so people have a clear understanding of what is going on.

So, I'm going to do a couple of questions that we already have gotten. We got a question that asks that they thought in this regulation, under 1305.4 K, that a children's Head Start eligibility continues for the - for next program, until the next program year. But how does that conflict with what they had rightly seen in another part of the regulation around Early Head Start eligibility continuing for the program year. And we want to be clear that what's here is just about -- on the eligibility duration -- is just about Head Start. So, for Head Start is just one program year; for Early Head Start it is for the duration of the program. But that you do need to make a re-eligibility determination in between Head Start and Early Head Start.

We've gotten a lot of questions about whether the definition of family for pregnant women changes the way we think about eligibility for teen parents. And we want to be clear that there isn't anything in this rule that [inaudible] specific about teen parent and this does not change that.

So, we were trying to be clear that pregnant women can be a family of themselves. That they don't have to have a parent apply for them. But I think there's been a lot of confusion about whether we are now saying that for teen parents you need to include their parent income as well and that is not what this regulation is saying. So, nothing has changed with regard to teen parents.

We've gotten again, questions about the compulsory school age. For those states where the compulsory school age is not until first grade, does that mean that we would have Head Start children in Head Start when they would normally be in kindergarten. And that is absolutely not the expectation. It is again in very unusual circumstances, maybe the best placements as determined by the [inaudible] IDA and in conjunction with the Head Start program, so that it's not completely forbidden, but it is not the expectation that that is at all the usual practice.

We got another question about pregnant asking are goods and resources included as well as financial support or are you just talking about more kind of cash, cash options, cash income. So, that is -- we have never had goods or resources as part of the income definition And again we have not in this regulation changed the definition of income. So, there is nothing that is changed here. We got a question saying: "Did I hear I correctly, that we do not need a copy of a birth certificate to prove age?" And that is not -- we know that some programs do require or do ask for that. It is not that you cannot ask for that. But we very much do not want a situation where what we asked to verify, something like age, creates a barrier for programs to enroll.

Particularly, we are required to be looking at -- to be removing barriers to homeless family to enroll. We may not -- we may have families that do not have birth certificates. May not maybe have easy access to them, may have to go through a process to obtain copies of that and pay for those. That is something that we do not require in current regulations, nor are we requiring here.

We want them to, the programs to do a reasonable job assessing that a child is age-eligible, but we do not think this is a major problem, that people are misrepresenting age to get into Head Start programs. And we certainly do not want to create barriers to families to enroll. And that is our biggest concern here.

They also asked -- someone asked whether it's standard practice to maintain a copy of a child's birth certificate. Again, birth certificates are not required. You are not required to retain them. With any documents that you do retain, programs do need to make sure that they have adequate protections for the safety and confidentiality of those files. So, we want to make sure that is an important consideration as well.

We got a question about the categorically eligible due to foster care. Would this make a child placed in kinship care also categorically eligible. So, I want folks to look at the definitions that we have. So we have the definitions around foster care in the regulation. And it makes it clear that for that there in the act again of placement. So it is where the state is involved and the child is placed in a 24-hour out of home placement that can be in kinship care and then they would be categorically eligible. There could also be cases in kinship care where the state is not involved at all -- That a child is with their grandparent or with a family member because of situations that are going on with the parent, but where there is no actual involvement of the state foster agency or anything else. That would not have a child being categorically eligible, but they would still could be eligible through any of the other categories and that family which is another question, those grandparents or family members would certainly be able to apply to Head Start for those children, but the foster care categorically eligible definition has a specific definition that is quite broad, but again not any circumstances.

We got a question about whether the, when the ECLKC would have these changes up to date. And I think now if you look there, I think the regulations are all up to date. A question someone asked is do copies of income statements -- currently copies of income statements are not kept. Are we not required to keep proof of income. And the answer is "Yes." So, that is one of the key changes in this rule -- that you do currently we know many programs look at the income, fill out the form and then either the form, and then [inaudible] the income, what you looked at back to families and don't keep those in the records. We are now saying that it needs to be kept as part of the records.

A question came in about whether for the third year -- if we say here again that for a third year in Head Start you need to have the income verified again, and that it's not the case for Early Head Start. Just Head Start you are eligible the year you are determined to be eligible and the next year for Early Head Start it is the full breadth of the Early Head Start program. That has not changed in this reg. So, if a child is staying for a third year of Early Head Start -- which we think is wonderful and we want to really support continuity of care -- that you are eligible for the full time you are in Early Head Start.

Also getting a question about, can a three year old be enrolled, when they leave Early Head Start, if they're 36 months, can they be enrolled even if they're not going to be eligible for preschool and in kindergarten the following year. So, if they were 3 but wouldn't be eligible. Yes, they can still be enrolled in Head Start.

And the question what is a form that you can accept, what is an acceptable document to verify the age, if the parents don't have a certified birth certificate. You really have broad latitude on the verification of age. You do a birth certificate, if they do not have a birth certificate. You can essentially accept the parents' statement of the age.

A question of whether there are still additional allowances for American Indian and Alaskan Native Head Start programs to serve 49 percent of children above income. Yes, that is a longstanding provision. We've codified it in the regulation here. As long as they are primarily or 51 percent serving under poverty line families they are able to serve up to 49 percent that are above income.

Let's see if we've got any other big questions. Here's a question that asks: Must a program serve all income-eligible children, before enrolling an over-income disabled child who is needed to meet the 10 percent. So no. Programs have always had the ability to serve 10 percent of children over income. That has no restrictions on it. It is not -- you're [inaudible] disabilities but it's certainly a way for a child that has a disability, where a Head Start program is the best placement.

And again, you have the requirement to serve 10 percent of children with disabilities -- absolutely makes sense. You do not need to serve poor children first. You do not need to do -- meet any bar for that 10 percent. You do need to be on that 10 percent to serve an additional 35 percent of children that are from 100 to 130 percent. You do need to show that you are serving the income-eligible people - the income or categorically eligible populations first. But to serve any over income children up to that 10 percent -- absolutely. Based on your selection criteria, so that you are enrolling the neediest children first, but that doesn't necessarily mean income. You do not -- there is no new requirements here -- And you do not to change anything there.

Someone asked to clarify that SSI and public assistance were different categories on the eligibility verification form. That's correct. There's different check boxes. We actually talked in the office whether we should be changing that form to conform the organizational structure a little bit more, on things like that -- on public assistance and SSI really being the same. We opted that it was more confusing to the field to change the form -- that it essentially still worked. And so, we are seeing SSI and public assistance as the same thing. But you can think of that form as essentially meaning you're checking TANF or SSI. I think we're -- so people asked the definition of foster care. The definition is laid out. I would encourage folks to look at the definition that is on -- I can read it to you, but it's a little bit long.

So, foster care means 24-hour substitute care for children placed away from their parents or guardian, and for whom the state agency has placement and care responsibility. So, that's the key we talked about before. That it's really that the state agency is involved. This includes but is not limited to: Placement in foster family homes, foster homes of relatives -- so kindred care, can be in the definition when the state is involved -- group homes, emergency shelters, residential facilities, child care institutions and pre-adoptive homes. A child is in foster care in accordance with this definition, whether the foster care facility is licensed and payments are made by the state and local agency, for the care of the child, whether the adoption subsidies are being made prior to the finalization of the adoption, or whether there is federal matching of any payments that are made.

So, that is a definition that we worked in collaboration with the Children's Bureau which is the agency responsible -- one of our sister agencies for working with states around child welfare and foster care. So that is our official definition. Again, just to clarify: That is what gets children to be categorically eligible. Folks that are in more informal kinship relationships can still be eligible based on income eligible for public assistance, homeless or other categories. There's a question of where we should describe our efforts if there's no income. Again, you can write that on the form. You can put another note in the file. But you really have discretion about how you would document that. I think we at this point will...

So the last question they talked about is whether, if a child is unable to go to kindergarten because folks have changed the date of -- you now have to be eligible, you have to be [inaudible] to five, by September as opposed to December. Can those children stay in Head Start. Absolutely. So, as states have changed their determination of when children are eligible to go to kindergarten, that shifts the pre-school year or the Head Start year, and we encourage programs to stay in line with those changes. And if a child is not eligible for kindergarten in your state, then they should absolutely be eligible for Head Start; if they have already been in Head Start for two years, they would need to have their eligibility re-verified for that final year.

But if they've only been in Head Start for one year or if they are coming in new to the program they would not need to have that verified again. But again, just if they've already been in two years.

So, I appreciate everybody staying on the phone today. And helping us with all the questions you sent in. And that I'm sure you'll continue to send in, which we appreciate. We will work on getting questions out on the ECLKC, to the questions that came in today. And we will have this PowerPoint and the webinar up for folks to access as well. So for everybody else that is getting snow I hope you stay safe and dry. And for those that are not I hope you enjoy that you're not. So, thanks everybody, very much, Bye -Bye.