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INFORMATION MEMORANDUM

TO: All Head Start and Early Head Start Agencies and Delegate Agencies in Areas Affected by the 2017 Hurricanes and Related Recovery Efforts

SUBJECT: Disaster Recovery from 2017 Hurricanes

INFORMATION:

The Administration for Children and Families (ACF) and the Office of Head Start (OHS) are very concerned about the devastation resulting from recent disasters affecting large numbers of Head Start programs, children, families, and staff. OHS is removing barriers to make it easier for Head Start agencies to meet the needs of those children and families affected by disasters, especially newly homeless children and families. Head Start programs serve a critical role in the recovery of impacted communities.

First, Head Start programs are urged to begin taking steps to resume services. Even if facilities are inoperable, program staff can support families in meeting their basic needs, including nutrition, health and mental health support, and alternative care for their children. Second, programs that have operable facilities are encouraged to allow displaced Head Start families supervised access to those facilities, including kitchens, rest/napping areas, computer labs, bathrooms, laundry, and power sources for re-charging phones and other communication devices. Grantees are encouraged to support families in accessing local, state, and federal relief and leveraging their community partnerships and resources to support other relief efforts.

Serving Other Eligible Head Start Families

Grantees near impacted areas are encouraged to assess how their services and resources might be used or shared to assist others affected by these disasters. Please consider your physical resources (e.g., facilities, equipment, supplies) and your human assets (e.g., staff, physicians, social workers, mental health personnel) that might be of assistance. In some cases, Head Start eligible children and their families might relocate to your community from other communities or close by states that were devastated by disasters. Finding creative ways to reach out and serve these families is encouraged.

Administrative Flexibility

OHS will rely on the judgment of governing bodies and program administrators at the community level to determine the most expeditious steps necessary to resume services. Individual states may waive some aspects of licensing requirements post-disaster, and programs are encouraged to contact their state licensing representative or Regional Office for guidance.

In some circumstances, if a grantee is unable to comply with a Head Start standard as a direct result of a disaster, OHS will consider waiver of that standard. However, no Head Start standard or requirement will be waived where failure to comply endangers the health and safety of children or constitutes fraud or misuse of federal funds. Grantees must, at all times, be able to assure the safety of children and financial accountability for funds and property.

Eligibility, Recruitment, Selection, and Enrollment

Grantees that offer both Head Start and Early Head Start may serve eligible impacted children ages birth to 5 within their overall funded enrollment and are not restricted to the current funded enrollment slots assigned to each program. Grantees that do not currently offer Early Head Start but that have appropriate space and staff qualified to serve infant and toddlers may contact their Regional Office about the potential to serve displaced infants and toddlers. Head Start programs that do not have qualified infant and toddler staff are encouraged to work with local programs that may have space for infants and toddlers or offer home visiting programs. As we work together to serve affected children and families, we must do so in ways that do not put children at risk.

Any age-eligible child from a family that has had to abandon their home because of the disaster should be considered homeless under the definition of "homeless children" in the McKinney-Vento Homeless Assistance Act. These children are eligible for Head Start services due to loss of housing or the fact they are living in emergency shelters or sharing housing with family or friends.

If a displaced family does not have the eligibility documentation in-hand, programs should be flexible in accepting signed statements from the family attesting to necessary eligibility information. Migrant and Seasonal Head Start programs can consider serving displaced children and families without regard to their income primarily coming from agricultural work if they have the space and resources to do so without diminishing services to children of agricultural workers.

Program Options and Hours of Program Operations

OHS will, for the remainder of the school year, allow any grantee to serve impacted or displaced children in any program option or options without obtaining advance approval. This applies to a conversion of a program segment, such as a center, to another program option so programs can accommodate as many children as possible. This time-limited exception to required procedures for obtaining OHS permission to convert services to a different program option as a "change to the scope or objectives of a program" under 45 CFR § 75.308(c)(1)(i) is based on the need for programs to act quickly in response to this large-scale and widespread emergency situation to ensure children's safety and well-being. Also for the remainder of this school year, affected programs may add or reduce hours or days of program operations without obtaining prior approval as long as these changes can be justified.

Grantees are required to notify their Regional Office of the action(s) taken as soon as it is practical to do so, using Head Start Enterprise System (HSES) correspondence.

Space, Class Size, and Ratios

Adequate classroom space may be a challenge post-disaster as programs strive to serve children displaced by the disaster. To allow grantees to be as responsive as possible to these children and their families, this communication constitutes waiver approval, for grantees in areas affected by large-scale disasters, as described under 45 CFR § 1302.24(c)(1) and (2) to exceed the class size/group size requirements of 45 CFR § 1302.21(b) and 1302.23(b) as long as grantees maintain appropriate adult to child ratios and comply with state and local licensing requirements, except when the state or local licensing agency waives these requirements, in which case grantees would not need to comply with the waived requirements. In cases where grantees cannot comply with square footage requirements for centers in 45 CFR Part § 1302.21(d)(2) during a temporary recovery period, compliance with a less stringent state or local standard will be regarded by OHS as evidence of a good faith effort to comply with the Head Start standard to the degree possible.

Grantees are required to notify their Regional Office of the action(s) taken as soon as it is practical to do so, using HSES correspondence.

Additional Classroom Staffing and Teacher Credentials

Using funds from existing operating budgets, programs may temporarily open additional classrooms to serve displaced children now considered homeless under the McKinney-Vento Act or children whose Head Start programs have closed due to damage. In addition, programs are encouraged to give priority to hiring staff displaced from other programs when hiring new classroom staff to cover classrooms. All staff working directly with children must be eligible for employment under applicable criminal background check requirements under the Head Start Act and state child care licensing requirements.

Safe Environments

Floodwater carries a wide variety of contaminants that can cause illness to young children. Contaminants can also aggravate existing medical conditions and accelerate the progress and severity of infections. Grantees are cautioned to be sure services are resumed only when children can be safely served in their centers and outdoor play areas. If centers or playgrounds were flooded, grantees should test indoor air quality and playground soil to be sure that contaminant levels are safe for children birth through age 5. Porous objects (e.g., wood, paper, bedding, books, etc.) should be carefully cleaned and inspected to assure they do not harbor contaminants that pose a danger to children. All state child care licensing requirements related to re-opening centers post-disaster must also be met before service in centers is resumed. Consult local and state health authorities for further information and be aware of flood recovery information available from the Centers for Disease Control and Prevention, which includes information and helpful links to other resources: <https://www.cdc.gov/features/flood-safety/index.html>.

Health and Mental Health Services

Addressing the health and mental health of children, families, and staff impacted by a disaster is critical to the recovery process. Children, families, and Head Start staff may experience stress and even trauma related to a hurricane or other disaster. These effects can be short-term or long-term and responses may vary across individuals. Grantees are encouraged to work with local agencies and partners to assure that all affected children receive needed health and mental health services as quickly as possible. When enrolling newly homeless children, programs must make best efforts to ascertain children's health status and immediate needs. Programs are also encouraged to work cooperatively to share children's records with health care providers locally and those who may be serving displaced children in other locations.

The following resources are available to assist programs in responding to a disaster as well as preparing for any future emergencies.

[The Head Start Emergency Preparedness Manual](#) addresses response and recovery as well as preparation. The Head Start Emergency Preparedness Manual addresses response and recovery as well preparation.

[Psychological First Aid](#) is an evidence-informed approach for assisting children, adolescents, adults, and families in the aftermath of disaster. The field manual includes handouts for parents, caregivers, as well as children birth to 5.

[Children's Responses to Crises and Tragic Events](#) is a tip sheet identifying what behaviors young children may display after a tragic event. Knowing what to look for can help programs determine when to get children the support they need.

[Helping Your Child Cope After a Disaster](#) is a tip sheet that provides families and staff with tools to help a child after a disaster or crisis. Children benefit when adults assure them that they are safe and help them learn how to cope effectively.

Nutrition

The U.S. Department of Agriculture (USDA) Food and Nutrition Services (FNS) has provided additional flexibilities for Child Nutrition Programs, including the Child and Adult Care Food Program (CACFP). For example, on August 29, 2017, FNS approved a request from Texas for waivers or program flexibilities for CACFP that will allow all schools and child care institutions and facilities in declared disaster counties to waive meal pattern requirements through September 30, 2017. Additionally, on September 3, 2017, FNS approved a request from Texas to substitute certain Women, Infants, and Children (WIC) approved food items (e.g., fluid milk, bread, and eggs) through September 24, 2017, due to regional demand and supply chain disruptions caused by Hurricane Harvey. For the latest information on disaster-related flexibilities in your service area, please visit <https://www.fns.usda.gov/disaster/>.

Children with Disabilities

When serving displaced children, programs should, where possible, acquire the Individualized Education Plans (IEPs) or Individual Family Service Plans (IFSPs) to assure the least possible disruption of these critical services.

Fiscal Management

Recovery Costs: Grantees are expected to seek out and apply for all available national, state, and local disaster recovery funding. Insurance policies should be carefully reviewed to determine the extent to which losses may be covered. Insurance claims should be submitted promptly with regular follow-up on claims status. Insurance proceeds received on account of losses related to Head Start-funded property are related program income which must be spent on allowable program and recovery expenses.

If necessary, affected grantees may use funds already awarded for program operations and training and technical assistance (T/TA) to support needed recovery efforts (see Budget Modifications below). If OHS receives disaster relief funding, that funding may be used to replace program operation and T/TA funds re-directed to post-disaster recovery and resumption of services. Grantees should be mindful of budget consequences when using program and T/TA funds for recovery activities to assure that sufficient program operations and T/TA funding remains available for ongoing provision of services.

Budget Modifications: It is anticipated that funds awarded for program operations may need to be re-directed to different budget categories to address post-disaster clean-up, repairs, health and safety issues, replacement of damaged equipment, furnishing and supplies, and other costs associated with resumption of services. Within a fiscal year, grantees may re-budget up to the lesser of \$250,000 or 25 percent of their annual funding between budget categories without prior written approval. In the event that re-budgeting in excess of the noted amount is needed, a revised SF-424 and prior written approval is required per 45 CFR § 75.308(b)(v).

Staffing and Wages: Program staff and volunteers may have suffered personal and property losses on account of the disaster. Employees may not be able to reach their work locations and centers may be closed for extended periods of time. Grantees should consider federal and state labor laws to determine whether they are required to compensate staff unable to work on account of inclement weather. The U.S. Department of Labor website provides helpful information about disaster related benefits and support: <https://www.dol.gov/general/hurricane-recovery>.

Laid-off employees should be encouraged to apply for unemployment compensation benefits and any other financial assistance available to support dislocated workers. If there are tasks that can be performed offsite, employees may be allowed to temporarily work from home during the disaster recovery period. Employees who take on new job responsibilities during the disaster recovery period, such as contacting parents or cleaning up centers, can be paid their regular wages for such work. Reasonable amounts of overtime may be paid if necessary to support recovery activities. Employees and volunteers should engage in clean-up and other onsite recovery activities only with appropriate

supervision and safety gear.

To facilitate the retention and availability for recall of employees when services resume, employees laid off on account of the disaster may be paid their regular wages (allocated for shared employees) from Head Start funds for up to two weeks (80 hours for hourly employees, one half of the regular monthly salary for salaried employees) if they are unable to engage in other employment activities, such as those noted above.

Equipment: Replacement of equipment needed for classroom operations, transportation and nutrition services is critical to resumption of services in affected areas. Grantees in the affected areas are hereby given ACF approval under 45 CFR § 75.308(c)(1)(xi) to purchase equipment needed to replace damaged or destroyed items at a per-unit cost of up to \$25,000. As soon as possible following purchase, grantees are required to inform their Regional Office of the equipment purchased, the equipment it replaced, and the cost of the purchased items. Prior written approval is required for replacement of equipment with a per-unit cost of more than \$25,000.

Procurement: Programs may experience post-disaster scarcity of materials and labor needed for recovery, particularly construction services. Grantees are encouraged to seek out reputable, licensed, local contractors to assist in recovery efforts. In consideration of the emergency and the pressing need to move forward with recovery activities, vehicle replacement, equipment, furnishing, materials, supplies and minor repairs and renovations related to these disasters which do not require compliance with 45 CFR § 1303-Subpart E may be undertaken by noncompetitive proposals as allowed in 45 CFR § 75.329(f)(2) for up to 12 months following the date of this Information Memorandum (IM). Procurement requirement as noted in 45 CFR §§ 75.329–75.335 must be followed and a complete application using SF-429 and Attachment B in compliance with 45 CFR § 1303-Subpart D must be submitted for purchase, construction, or major renovations as defined in 45 CFR § 1305.2. Grantees are reminded of the need to retain adequate documentation of all disaster recovery expenses noting their relationship to post-disaster recovery.

Davis-Bacon Act: Unless waived in disaster relief legislation passed by Congress, the Davis-Bacon Act applies to covered construction activities in excess of \$2,000. Davis-Bacon Act compliance information may be found at: <https://www.dol.gov/whd/govcontracts/dbra.htm>.

Information on Damage and Recovery

Collecting accurate data on damages and recovery costs is critical. Head Start facilities that have been damaged should be inspected as soon as it is safe to do so. Grantees should prioritize those repairs that must be completed before the facilities can reopen. Your Regional Office will be in close communication with you about your recovery efforts and it is very important that you submit accurate data as soon as you have determined the scope and projected costs of these repairs. The following information will be particularly helpful:

- Did the center experience flooding or other damage?
- Was the structure of the center damaged (e.g., windows blown out, serious roof damage, exterior walls damaged, foundation settled, floodwater more than 2 feet in depth at highest point)?
- What non-structural damage did the center experience (e.g., playground flooded, soaked flooring, minor roof damage, floodwater less than 2 feet in depth at highest point, some windows broken)?
- Were supplies and furnishings damaged at the center?
- Were buses or other vehicles at the center damaged directly or submerged over wheel depth in water? How many?

While we do not have information on the potential recovery funds for Head Start, having accurate information as soon as possible will help to inform federal recovery efforts. Given the extensive power outages, OHS will also grant extensions to those grantees affected by the recent disaster and recovery efforts in submitting SF-425s, SF-429s, End of Month Enrollment Data, and refunding applications due October 1, 2017. As soon as practical, please notify your Regional Office of the need for such an extension.

Next Steps

OHS recognizes the incredible commitment and strength of program staff across the country, even as we know many staff are themselves personally affected when a disaster strikes a community. ACF and OHS will assist and support you in every way possible. National and Regional ACF staff will be available to help coordinate services among the Head Start programs in neighboring communities and in your state, as well as the federal, state, and local entities with which you partner. If programs encounter other barriers to responding to children and families in need or to partnering with local education agencies or child care agencies, aside from those included in this IM, please let your Regional Office know so we can work together to resolve those barriers. Additionally, fiscal year 2018 monitoring schedules will be adjusted, as necessary, for programs impacted by the disaster.

Lastly, this IM focuses on what you can do now with the funding you have or can leverage through other sources. If Congress appropriates recovery funds for Head Start, OHS is committed to work as expeditiously as possible to communicate the process for applying for relief funding.

Thank you so much for doing all you can to help children, families, and staff who have experienced such disruption and loss.

/ Ann Linehan /

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