

Memorandum

To: WNCSource Board of Directors

From: David White, CEO

Date: January 8, 2024

Re: The Office of Head Start's Notice of Proposed Rulemaking and My Response to the Federal Register

In late November of 2023 the Office of Head Start (OHS) announced a Notice of Proposed Rulemaking (NPRM). Here is a link to the OHS [NPRM](#). This started a sixty-day comment period. Comments on the NPRM must be submitted to the Federal Register by January 19, 2024. Since that time I have watched the Office of Head Starts three webinars on the NPRM, and attended an in person meeting in Atlanta with Khari Garvin, OHS Director.

I was also invited by Yasmina Vinci, Executive Director of the National Head Start Association (NHSA) to serve on an NPRM work group with fifty other Head Start leaders from across the country. The workgroup has assisted NHSA in drafting a response to the NPRM. The workgroup has met four times for a total of six hours.

Last Thursday, January 4th NHSA released a twenty-page draft of their response to the NPRM. A link to that draft is [here](#). I agree with most of their response, but being well-steeped in these issues for the last two months, and having supported OHS in its efforts to raise Head Start salaries and benefits, I do not want to add WNCSource as a co-signer on the NHSA response.

Below is how I would like to respond to the NPRM in the Federal Register:

As a member of the NHSA, NPRM Work Group I agree with and support most of their response. I do have the following additional thoughts on the NPRM:

1. Workforce Compensation, Benefits and Wellness

I support OHS's draft NPRM on setting goals and timelines for Head Start grantees to raise staff pay through enrollment reductions, if other resources are not available. Head Start for too long has required a better educated and highly trained work force. It has not fairly compensated this workforce, and this has led to a staffing crisis. Reaching pay parity with public school kindergarten through third grade teachers is essential for the future of Head Start programs and the families they serve.

I also support OHS's draft NPRM requirement for programs to update their pay scale for all staff to ensure that wages are competitive across positions. Grant recipients have been

required to complete wage comparability studies for decades. I believe this requirement will be needed to move programs towards pay parity.

Under staff benefits, I agree with the draft NPRM requirement for three to five outpatient visits per year for mental health concerns. This requirement can be easily attained through an Employee Assistance Network, or reduced copays for mental health visits. Improved mental health for Head Start staff has been an area of focus as programs seek to improve safety and reduce turnover.

Also under staff benefits, I agree with the draft NPRM on the requirement for some required match for retirement benefits. Even if it is just a 2.5% retirement 403b match, it would move all Head Start programs towards making sure that retirement planning is part of their benefits.

Thank you to OHS for taking these comments. I hope NHSA's response, and comments from others in the Head Start community, will lead to substantial changes in the final rule.

David White
CEO
WNCSource