New Standards for Vaccination and Masking to Reduce Transmission of COVID-19

The U.S. Department of Health and Human Services (HHS) is issuing new Head Start Program Performance Standards (HSPPS) to outline the masking and COVID-19 vaccination requirements for grant recipient staff, and the timelines, exceptions, and exemptions for each. Consistent with other HSPPS, these standards will apply to Head Start, Early Head Start, Early Head Start-Child Care Partnership, and American Indian and Alaska Native, and Migrant and Seasonal Head Start programs. The Interim Final Rule with Comment Period (IFC) is now posted in the Federal Register.

As the Head Start community navigates implementation of this rule, the Office of Head Start (OHS) is dedicated to supporting programs. While a fully vaccinated workforce brings hope of reaching more children and families, I know it does not come without challenges. Let us begin with a shared understanding of why these new HSPPS are necessary.

Many programs have shared firsthand experience on how intermittent closures disrupt children’s opportunities for learning, socialization, nutrition, continuity, and routine. Program closures also impact the ability of Head Start families to work, which ultimately creates instability and adds to their stress. As a Head Start graduate, I know my life would be impacted for every day my Head Start program was not open, or if the bus simply did not show up one day. Vaccination against COVID-19 and wearing face masks are safe, effective tools to reduce program closures and support the continuity of in-person comprehensive services for children and families.

The new HSPPS are essential for protecting the living environments of our Head Start families. Many children and staff return home to family members who may have underlying medical conditions, which put them at greater risk for COVID-19-related illness or even death. It is also important to recognize that families who are Black, Indigenous, or Hispanic and earning below the federal poverty line have been more severely impacted by COVID-19 than the general population.

Requiring all Head Start staff, some contractors, and volunteers to be vaccinated against COVID-19 and universal masking for all individuals 2 years of age and older is critical as we work together to move toward fully in-person comprehensive services by providing healthy and safe environments for everyone.

The HSPPS require the use of face masks for everyone in a Head Start program 2 years of age and older, with some exceptions. The requirement on masking is effective immediately.
The new HSPPS also require vaccination against COVID-19 for all staff, contractors working directly with children, and volunteers. The HSPPS require these individuals to be vaccinated by January 31, 2022. This means staff, certain contractors, and volunteers must have their second dose in a two-dose series or first in a single-dose series by January 31, 2022. Head Start programs may allow exemptions to the vaccination requirement for those who cannot be vaccinated due to medical conditions or sincerely held religious beliefs, practices, or observances. For those granted a vaccine exemption, there will be a weekly testing requirement. Without an approved vaccine exemption, there is no option for testing in lieu of receiving the vaccine.

Consistent with other HSPPS, these new standards focus on outcomes over processes and plans. As the experts most familiar with the unique needs of each Head Start community, local programs are responsible for establishing a process for implementing these standards. This includes reviewing and granting the exemptions for medical conditions or religious beliefs. These new standards will be monitored through the OHS Monitoring System like other health and safety standards.

Many staff and program leaders are concerned about the impact of these new requirements on programs that may already have a difficult time recruiting and retaining staff. I appreciate Head Start staff are incredibly dedicated to the children they serve, and also under stress from many directions. I am worried about the waitlist of children who cannot attend a program because of the long-standing workforce shortages that have been exacerbated since the onset of COVID-19. As we work to ensure a healthy and vaccinated staff, we are also committed to supporting wellness and improving compensation for the Head Start workforce. I encourage programs to use available funds, including American Rescue Plan (ARP) supplemental funds, to recruit and retain staff. I also encourage you to talk with staff about the vaccine and support them in speaking to a health care professional about their vaccination decision.

I know that navigating this road has not been easy, but we’re in this together! OHS has published a fact sheet, as well as responses to the questions we know you have. For more details about the research and data that supported our decisions, read the Preamble to the rule. You are invited to join our webinar to hear more about the new requirements. The Office of Head Start’s Early Childhood Learning and Knowledge Center (ECLKC) website has information and resources about implementing masking and staff vaccination requirements.

During these uncertain times, it is also helpful to hear from others who have been successful in implementing similar requirements. The Strategies for Staff Vaccination series presents stories of programs across the country who supported their staff through COVID-19 vaccination requirements. The MyPeers Health, Safety, and Wellness community is a great place to find out how other Head Start programs are making policies and to share ideas and resources with each other. The OHS technical assistance system will continue to support grant recipients in implementing these new requirements.
I am grateful that my Head Start program was open when I was a child, and I am thankful for the many programs that are open for in-person services today. The Head Start community is a model for the country in addressing the comprehensive needs of children and families. I am so proud to work with staff who continue to answer the call to lead their communities as we get back to what Head Start programs do best: engage, nurture, teach, and support children and families face-to-face.

Sleeve up and mask up, Head Start family, as it’s the best way we can care for and protect each other.

/ Dr. Bernadine Futrell /

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