

## BRIEF POINTS FROM THE FINAL RULE ON RECOMPETITION

1. There will **NOT be a quota of 25%** of grantees competed each year
  2. The official date for the identification of programs to be recompeted is **June 12, 2009** – “where data collected **may** be considered for all of the conditions except for school readiness goals”... *Apparently if any one of the seven triggers listed below occurred with a grantee after 6/12/09, that grantee MAY be put into recompetition in the first round. (the operative word MAY is found on page 9 of the preamble to the rule)*
  3. The seven triggers listed in the NPRM will stand for putting a program into recomplete status. They are:
    - a. One or more deficiencies in a single review conducted under section 641A of the ACT (*section 641A outlines details for the on-site review process*)
    - b. A program that does NOT have established program goals for improving the school readiness of children in accordance with the requirements of 641A(g)(2) and demonstrated such goals (*this requirement will not be retroactive to 2009 and has a lengthy description of the activities necessary to establish school readiness goals and the steps necessary to determine if they are met*)
    - c. To have an average score across all classrooms below the following minimum thresholds on any of the three CLASS: Pre-K domains from the most recent CLASS: Pre-K observation
      - i. Emotional Support domain - minimum threshold is 4
      - ii. Classroom Organization domain – minimum threshold is 3
      - iii. Instructional Support domain – minimum threshold is 2

AND/OR (*I think – read it, it IS confusing*)

    - iv. Have an average CLASS score across all classrooms observed that is in the lowest 10 percent on any of the three CLASS : Pre-K domains from the most recent CLASS observation  
*There is considerable language around the class requirements and a somewhat convoluted scoring process which allows for an average score of 6 across all three domains (considered to be the standard of excellence) to trump being in the lowest 10% on the Emotional Support domain. Read it – it's confusing!!!! It is also noted that the additional requirement under the CLASS assessments has been added in response to the objections for the 25% quota and the potential additional triggers listed in the NRFP*
  - d. The revocation of a license to operate a Head Start or Early Head Start center by the state or local licensing agency, and the revocation has not been overturned or withdrawn before the recompetition period has been announced
  - e. Suspension of the Head Start or Early Head Start program by ACF, and the suspension has not been overturned or withdrawn
  - f. An agency has been debarred from receiving Federal or State funds from any Federal or State department or agency, or has been disqualified from the Child and Adult Care Food Program (CACFP)
  - g. An agency has been determined within the 12 months prior to the HHS review (for the purposes of Redesignation) to be at risk of failing to continue functioning as a going concern
4. There is considerable language written about how the initial period for Redesignation will begin and how programs will be identified in that initial period (to begin within 30 days of the announcement)
5. There is an estimate that roughly 1/3 of all grantees will be identified for recompetition. In any given year that would amount to roughly 187 programs per year.
6. There is an assumption that in the event grantees are replaced, that the replacement process will go smoothly and not disrupt services to children and families, and only in exceptional circumstances would ACF identify an interim grantee
7. There is an assumption that this process for recompetition will not cost any grantee more than \$1,500
8. There is no concession given for Agencies with delegates where a single act by one delegate will throw the entire program into recompetition