



FY 2011
Office of Head Start
Monitoring Protocol
September 16, 2010



Table of Contents

Introduction to the FY2011 Office of Head Start Monitoring Guides.....	ii
Health Services.....	1
Nutrition Services.....	16
Safe Environments.....	28
Transportation Services.....	52
Disabilities Services.....	68
Mental Health Services.....	83
Family and Community Partnerships.....	90
Education and Early Childhood Development (ECD)	103
Fiscal Management.....	132
Program Design and Management.....	171
Eligibility, Recruitment, Selection, Enrollment, and Attendance.....	211



Introduction to the FY 2011 Office of Head Start Monitoring Protocol

Overview

The Office of Head Start (OHS) presents the FY 2011 Monitoring Protocol, which is the tool that guides the on-site monitoring review. The Protocol identifies the key requirements (Performance Standards and regulations) against which to monitor grantee performance. Grantee data gathered through the monitoring process provides OHS with information on performance, thereby informing determinations regarding program quality and compliance.

The Protocol has been revised for FY 2011 to place a greater emphasis on the quality of the delivery and management of program services. The focus of the Protocol is on making connections between program systems and collecting data on critical indicators of success in promoting school readiness. The Protocol organizes elements of program performance standards, the Head Start Act, and other regulations into 11 sections against which compliance will be monitored:

1. Health Services
2. Nutrition Services
3. Safe Environments
4. Transportation Services
5. Disabilities Services
6. Mental Health Services
7. Family and Community Partnerships
8. Education and Early Childhood Development (ECD)
9. Fiscal Management
10. Program Design and Management
11. Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)

In FY 2011, the Monitoring Protocol includes a subset of questions used to monitor the performance of ARRA grantees; this subset is called the ARRA Protocol. ARRA Protocol questions are a subset of the 11 Protocol sections and are integrated into the Guides where appropriate. These questions can be found in the *FY2011 OHS ARRA Monitoring Protocol and Guides*.

Organization of the Protocol

The FY 2011 Monitoring Protocol introduces a new organizing framework designed to reorient review teams to better synthesize information about discrete program requirements into a richer understanding of grantee performance. The Protocol now includes **Compliance Framework** statements. Each Compliance Framework groups together related program requirements to make it easier to observe how the information connects and to stimulate analysis of how the program's systems support the delivery of services. The Compliance Framework statements focus attention on the "big picture" – they highlight key objectives that programs should achieve in their service delivery and management system design and implementation.



Protocol sections that monitor each of the primary areas of service delivery (i.e., Health, Nutrition, Mental Health, Disabilities, Family and Community Partnership), Education and Early Childhood Development, and the Program Design and Management section have been organized under Compliance Frameworks. Protocol sections that are not organized around Frameworks are organized around Compliance Indicators (discussed below).

Each Compliance Framework statement contains a series of **Compliance Indicators** (CI) (formerly referred to as Compliance Questions) that serve as the markers to assess whether the grantee is meeting the objectives outlined within the Compliance Framework statement. Compliance Indicators facilitate integration of information to gain a deeper understanding of grantee performance and focus on one or more performance standards and/or citations of the Head Start Act. Compliance Indicators are the specific statements that collectively serve as makers to measure grantee performance. All protocol sections contain Compliance Indicators.

Targeted Questions (TQ) connect to the overall Framework and Compliance Indicators to facilitate the monitoring process for each content area. Review teams must respond to Targeted Questions using the prompts that outline the minimum “evidence gathering” requirements for measuring Compliance Indicators. The Targeted Questions indicate the people to interview, questions to ask, information to retrieve from documents, observations to conduct, and management systems to analyze and summarize in developing an understanding of grantee compliance with each Compliance Indicator.

Emphasis for FY 2011

Head Start monitoring focuses on assessing grantee performance in terms of the quality of the services programs deliver to enrolled children and families, and the quality and sustainability of the management systems established to support these services. To ensure transparency and consistency in the monitoring process, the Protocol guides review teams to collect information in a systematic manner to provide a clear, comprehensive picture of grantee performance in relation to these requirements. In FY 2011, OHS monitoring focuses on the big picture, telling each grantee’s story by synthesizing information collected during the on-site review into descriptions of how each program delivers services to Head Start children and families.



Introduction: Health Services

Promoting the well-being of children is a vital component of the Head Start program. Head Start's goal in this service area is to help ensure that children are getting the health services they need and that programs are working with parents to ensure that they are active participants in the well-being and ongoing health and development of their children. In order to assess whether programs are adequately advocating for children's health and wellness, reviewers should be prepared to conduct a thorough analysis of the qualifications and training of staff, tracking and monitoring of screenings/assessments, identification and planning for children's health/safety needs, and the methods for providing assistance to families in accessing health and dental care for their child. Their analysis will also include examining the program's policies and procedures designed to provide health services.

The **Health Services** section of the Protocol is divided into six (6) Compliance Frameworks:

- Staff Qualifications
- Helping Families Access Health and Dental Care
- Health Screenings and Follow Ups
- Partnering with Parents
- Health and Safety Needs of Children
- Health Services for Pregnant Women and New Mothers



Health Services

Health Services Compliance Framework #1 - Staff Qualifications - Health Services

The grantee ensures effective oversight, coordination, and management of the program’s health services by hiring qualified staff and/or consultants and ensuring they have adopted the functions of the area.

Compliance Indicators:

1.1 The program hires staff or consultants as content area experts to oversee health services who have training and experience in public health, nursing, health education, maternal and child health, or health administration. As part of this oversight, the program assures that health procedures are performed only by a licensed or certified health professional.

1304.52(d)(2)

1.2 The program ensures that the program management functions for health services are formally assigned to and adopted by staff within the program.
 Note: There is a distinction between the content area expert and the service area manager. One person can fill both of the roles. However, the content area expert must meet all of the qualification requirements as outlined in the performance standards. The Manager or Coordinator does not need to meet these qualifications but must receive expert knowledge and oversight from a Content Area Expert.

1304.52(a)(2)(ii),
1304.52(b)(1)

Targeted Questions for Health Services Compliance Framework #1 - Staff Qualifications - Health Services

Interview: Health Content Area Expert (Staff Qualifications and Expertise)

► Describe your training and experience. Talk about your training and experience in public health, nursing, health education, maternal and child health, or health administration.

HEA1.1

► How is the program made aware of health procedures that must be performed, and how does the program determine who performs them? Are health procedures performed by a licensed and certified professional when required?

HEA1.1

► Describe your process for regular staff oversight, monitoring the provision of health services, what you do when problems are identified, and how you use the community and self assessment in program planning to continually improve health services.

HEA1.1

Document Review: Health Policies and Procedures

► Review the program’s plan and procedures for administration of health procedures to enrolled children to determine whether qualified health professionals are required to administer health procedures to children.

HEA1.1



Staff Files: Health Content Area Expert (Staff Qualifications and Expertise)

- ▶ Review employee and/or consultant files. Document the coordinator/health content area expert's training, experience, and qualifications. Indicate whether there is one or more staff or consultants overseeing this area, and provide credentials of each person.

HEA1.1

Interview: Health Coordinator (Staff Qualifications and Expertise)

- ▶ Describe how your knowledge, skills, and experience assist you in performing your assigned functions in the area of health services responsibly.

HEA1.2

Staff Files: Health Coordinator (Staff Qualifications and Expertise)

- ▶ Determine who is formally assigned to the functions of managing health services. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

HEA1.2



Health Services

Health Services Compliance Framework #2 - Helping Families Access Health and Dental Care

The program assists families in actively promoting and advocating for their child’s health by determining if each child has access to an ongoing source of continuous medical and oral health care; assessing and monitoring the health status of all enrolled children; determining if each child is up to date on a schedule of primary and preventive health care as recommended by State EPSDT (including dental); ensuring referrals are made; and supporting families in obtaining follow-up care.

Compliance Indicators:

2.1 The program has established procedures for tracking the provision of health care services.	1304.20(a)(1)(ii)(C)
2.2 The program determines whether each child has an ongoing source of continuous, accessible health care. 1304.20(a)(2) applies only to Migrant and Seasonal programs and should be cited in conjunction with 1304.20(a)(1)(i) for such programs.	1304.20(a)(1)(i), 1304.20(a)(2)
2.3 The program engages parents in obtaining from a health care professional a determination of whether each child is up to date on a schedule of primary and preventative health care (including dental), and assists parents to bring their children up to date when necessary, and keep their children up to date as required. 1304.20(a)(2) applies only to Migrant and Seasonal programs and should be cited in conjunction with 1304.20(a)(1)(ii), 1304.20(a)(1)(ii)(A) or 1304.20(a)(1)(ii)(B) for such programs.	1304.20(a)(1)(ii), 1304.20(a)(1)(ii)(A), 1304.20(a)(1)(ii)(B), 1304.20(a)(2)
2.4 The program implements ongoing procedures for identifying new or recurring medical, oral health, or developmental concerns so appropriate referrals can be made quickly.	1304.20(d)

Targeted Questions for Health Services Compliance Framework #2 - Helping Families Access Health and Dental Care

Interview: Health Coordinator (Tracking Health Services)

► Describe how you use your Health Services Plan and procedures to guide how you and your staff implement health services for children and families. Describe your system for providing required health services and how it is used to meet the needs of children. How do you determine child health status, use information for any necessary referrals, engage parents in keeping children current on a schedule of well-child medical and oral health care, and identify and promptly refer any new medical and oral health concerns?

HEA2.1

Document Review: Health Tracking System

► Ask the Health Coordinator to walk you through the Health Tracking System and show you how the program uses the Health Tracking System to obtain, use, and report information from the health tracking system.

HEA2.1



► How does the program use the information from the Health Tracking System to inform and assist parents in keeping their children up to date and advocating for their children's physical and oral health? Describe this system and any instances of children who are not up-to-date and the process the program uses, including inclusion of parents, to bring children up-to-date.

HEA2.1

► Using a sample of child files, work with the Health Coordinator to determine whether the information in the files is consistent with the information documented in the tracking system. Document any discrepancies found between the files and the tracking system and use follow-up questions to determine how the staff handles these discrepancies.

HEA2.1

Interview: Parent (Helping Families Access Health and Dental Care)

► How does the program assist you in making sure that your child has a health care provider and dentist?

HEA2.2

Asked By: ISR I

► Has the program helped you keep your child healthy? For example, has the program helped you to make and keep appointments with your child's doctor and dentist? Has it helped you understand the state wellness schedule and given you information on when to get shots or exams?

HEA2.3

Asked By: ISR I

► Has the program helped you obtain or arrange further testing, examination, and treatment for your child when necessary?

HEA2.3

Asked By: ISR I

Document Review: Health Policies and Procedures

► Does the program have written health plans and procedures that provide:

- Specific instructions and strategies to assist staff in determining whether each child has an ongoing source of health care;
- Whether each child is up to date on a schedule of preventative and primary medical and oral health care as required by the State EPSDT well-child care guidelines; and
- Whether each family is supported in obtaining health and oral health care services for the prevention of health-related concerns and follow-up as required?

HEA2.2

HEA2.3

► Document how the plan and procedures clearly articulate a systematic process for implementation of the required health services and how it is used by the program to meet the health and oral health needs of children.

HEA2.2

HEA2.3

► Document the grantee's process and procedures for identifying any new or recurring medical, dental or developmental concerns and quickly making appropriate referrals.

HEA2.4

HEA3.2



Child Files: Helping Families Access Health and Dental Care

► Review child files to determine whether children's ongoing source of health care is addressed during enrollment activities, before they enter the program, or within 90 days of entry into the program (30 days for Migrant and Seasonal programs).

HEA2.2

► Review child files for up to date determinations that incorporate the requirements of the Early Periodic Screening, Diagnosis, and Treatment (State EPSDT) schedule for each child and check dates of determinations to ensure the 90-day requirement (30 days for Migrant and Seasonal grantees) is met.

HEA2.3

► Review child files for documentation (e.g., case notes, family contact logs) of the program's attempts to help parents bring their child up to date. Does the program work with parents to bring their child up to date on a schedule of primary and preventive health care?

HEA2.3

Interview: Health Coordinator (State EPSDT Schedule)

► How do you use the current and applicable EPSDT schedule in keeping children up to date on a schedule of preventive care?

HEA2.3

Document Review: State EPSDT Schedule

► Review the current and applicable State EPSDT schedule to determine whether the program accesses and uses the most current and applicable state's schedule when monitoring the health and oral health status of children.

HEA2.3



Health Services

Health Services Compliance Framework #3 - Health Screenings and Follow ups

To ensure children receive timely intervention for the evaluation and treatment of health and developmental concerns, the grantee utilizes information from sensory, developmental and behavioral screenings, in addition to other information to identify concerns, to make referrals for further evaluation and treatment, and to implement individualized follow-up plans.

Compliance Indicators:

<p>3.1 The program, in collaboration with each child’s parent, performs or obtains the required linguistically and age appropriate screenings to identify concerns regarding children within 45 days of entry into the program, obtains guidance on how to use the screening results, and uses multiple sources of information to make appropriate referrals. 1304.20(a)(2) applies only to Migrant and Seasonal programs and should be cited in conjunction with 1304.20(b)(1) for such programs.</p>	<p>1304.20(b)(1), 1304.20(b)(2), 1304.20(b)(3), 1304.20(a)(2)</p>
<p>3.2 The program ensures that each child with a known, observable, or suspected health, oral health, or developmental problem receives follow up and further testing, examination, and treatment from a licensed or certified health care professional.</p>	<p>1304.20(a)(1)(iii), 1304.20(c)(3)(ii), 1304.20(a)(1)(iv)</p>
<p>3.3 The program establishes systems of ongoing communication with parents of children with identified health needs to facilitate follow up.</p>	<p>1304.20(c)(1)</p>

Targeted Questions for Health Services Compliance Framework #3 - Health Screenings and Follow ups

Child Files: Health Screenings and Follow ups

► Review child files for completion of all screenings within 45 days (30 days for Migrant and Seasonal programs) from the child's entry into the program. If concerns were documented at follow up, indicate whether appropriate referrals were made.

HEA3.1

► Review files of the children with known or suspected health or developmental problems (that you identified at the review’s start) to determine whether further testing, examination, or treatment was obtained and whether a follow-up plan is in place and implemented, if appropriate.

HEA3.2

Interview: Health Coordinator (Screenings)

► Describe how you obtain guidance from the mental health or child development specialist on how to use screening findings.

HEA3.1

MH2.3



► How do you use multiple sources of information and consultation with health professionals, child development specialist and mental health consultants to interpret and use screening and developmental information?

HEA3.1

► Describe the process your program uses to ensure that each child has the required culturally sensitive, sensory, developmental and behavioral screenings within 45 days of program entry (30 days for Migrant and Seasonal Programs), and that follow-up is planned for and initiated if a known or suspected health or developmental problem has been identified.

HEA3.1

HEA3.2, HEA3.3

► How do you ensure that screenings, follow-up and the provision of health procedures are timely and engage parent involvement and consent?

HEA3.3

Document Review: Health Policies and Procedures

► Document the grantee's process and procedures for identifying any new or recurring medical, dental or developmental concerns and quickly making appropriate referrals.

HEA3.2

HEA2.4



Health Services

Health Services Compliance Framework #4 - Partnering with Parents

The grantee partners with parents in promoting their child’s health and wellness by ensuring they are informed of any suspected or identified health or developmental problems and obtaining permission and sharing results for all health procedures, referrals and treatment plans.

Compliance Indicators:

4.1 The program involves parents, consulting with them immediately when child health or developmental problems are suspected or identified, and informing them immediately in the case of an emergency involving their children.	1304.20(e)(1), 1304.22(a)(4), 1306.35(c)
4.2 The program informs parents and obtains authorization prior to all health procedures, explains results, and maintains written documentation of instances when parents or other legally responsible adults refuse to give authorization for health services.	1304.20(e)(2), 1304.20(e)(5)

Targeted Questions for Health Services Compliance Framework #4 - Partnering with Parents

Interview: Health Coordinator (Notifications)

► Describe your procedure for contacting parents regarding an emergency involving their child. Can you give an example(s) of such a situation?

HEA4.1

Interview: Parent (Notifications)

► How are you notified in the event of an emergency involving your child?

HEA4.1

Asked By: ISR I

► How are you notified of unplanned interruptions in service (e.g., program closing)? Do you have any examples of program actions during unexpected closures or emergencies (e.g., help locate an alternate provider or substitute)?

HEA4.1

Asked By: ISR I

Interview: Family Child Care Provider (Notifications)

► What is the system for notifying parents of emergencies or unplanned interruptions in service? Describe the contingency plans you have developed with parents for these emergencies (e.g., alternative providers or substitutes).

HEA4.1

Asked By: ECD

► How do you inform parents of an emergency or the need to pick up a child who has become ill?

HEA4.1

Asked By: ECD



Interview: Parent (Parent Involvement)

- ▶ How does the program provide you with information about health procedures, such as the importance of screenings and the results? Did they give you an opportunity to refuse health services and explain that screening and health procedures could not be conducted without your consent?

HEA4.2

Asked By: ISR I

Child Files: Partnering with Parents

- ▶ Review child files for documentation of parent permission prior to the administration of any health procedures. If parents have not given permission, look for documentation of refusal to authorize services.

HEA4.2

Interview: Health Coordinator (Partnering with Parents)

- ▶ Describe how the program provides parents with the opportunity to provide informed consent for all health related services and developmental procedures. Talk about how you inform parents about the use and rationale behind health and development screenings, procedures for advance authorization, health procedures administered by the program and procedures for refusal to authorize health services.

HEA4.2



Health Services

Health Services Compliance Framework #5 - Health and Safety Needs of Children

The program has knowledge of the health and safety needs of each child, and ensures the well being of each child by informing appropriate staff of accommodations necessary for maximum program participation and immediately informing parents of any emergency involving their child.

Compliance Indicators:

5.1 The program obtains information from parents about their children's health or safety needs, identifies and plans for accommodations, and ensures that appropriate staff are informed and trained as needed, in accordance with the program's confidentiality policy.	1304.22(b)(3)
5.2 The program ensures that a child with a short-term injury (that cannot be readily accommodated) or short-term contagious illness is temporarily excluded from participating in program activities or group experiences while there is a risk to the health or safety of other children or other adults present.	1304.22(b)(1)
5.3 The program ensures that children are not denied admission (or if already enrolled, they are not subjected to long-term exclusion) solely because of their health care needs or medication requirements, unless reasonable accommodations cannot be made to reduce the health or safety risk to that child or others without altering the nature of the program fundamentally.	1304.22(b)(2)

Targeted Questions for Health Services Compliance Framework #5 - Health and Safety Needs of Children

Interview: Parent (Children with Special Health Needs)

► Can you describe how program staff discuss your children's special health, safety or nutritional needs with you?

HEA5.1

Asked By: ISR I

Document Review: Health Policies and Procedures

► Review the process for obtaining information from parents regarding the health or safety needs of their child and any accommodations that are required to ensure their child's optimal participation in the program.

HEA5.1

► Review the policies and procedures the program implements for handling short-term injuries (that cannot be readily accommodated) or short-term contagious illnesses.

HEA5.2

Interview: Health Coordinator (Children with Special Health Needs)

► Describe the process for obtaining information from parents about their children's health or safety needs and identifying and planning for needed accommodations. How do you ensure that this information is kept confidential?

HEA5.1



► How do you ensure that staff members who work directly with children are informed (and trained as needed) on identified accommodations?

HEA5.1

► Can you give an example(s) of children who were denied admission to (or terminated from) the program for health reasons that could not be accommodated? What was the basis for denying admission?

HEA5.3

Interview: Health Coordinator (Short-Term Injury or Illness)

► How does the program determine whether a child with a short-term injury or illness can be accommodated or should be temporarily excluded from the program? How are parents informed of the policies or procedures related to short-term injury or illness and any decisions related to their child?

HEA5.2



Health Services

Health Services Compliance Framework #6 - Health Services for Pregnant Women and New Mothers

The program promotes healthy pregnancies, the post natal health and wellness of new mothers, and the wellbeing of newborn babies by assisting them in accessing regular comprehensive pre-natal and post-natal care, providing referrals for mental health intervention and health treatment, providing maternal health education and conducting a post natal health visit.

Compliance Indicators:

6.1 The Early Head Start program helps pregnant women, immediately after enrollment in the program, access through referrals, early and regular comprehensive prenatal and postnatal care that includes early, continuing risk assessment, health promotion and treatment, and mental health interventions and follow-up as appropriate.	1304.40(c)(1), 1304.40(c)(1)(i), 1304.40(c)(1)(ii), 1304.40(c)(1)(iii)
6.2 Program health staff conduct a home visit or ensure that a licensed health care professional visits each newborn within two weeks of birth to ensure both the mother and child's wellbeing.	1304.40(i)(6)
6.3 The program provides pregnant women and other family members with prenatal and postnatal education on: <ul style="list-style-type: none"> • Fetal development, labor and delivery, and postpartum recovery; • Risks from smoking and alcohol; • Maternal depression; and • Breastfeeding benefits. 	1304.40(c)(2), 1304.40(c)(3)

Targeted Questions for Health Services Compliance Framework #6 - Health Services for Pregnant Women and New Mothers

Interview: Parent (Pre/Post Natal Care Services)

► How did the program help to make sure you were receiving early prenatal and post natal care that included ongoing scheduled medical visits, nutrition assessment/guidance and post-partum follow up? Did they offer to assist in referring you to mental health providers if you needed them?

HEA6.1

Asked By: ISR I

► Did you receive a visit within two weeks of your child's birth? If so, what did this visit cover?

HEA6.2

Asked By: ISR I

► What prenatal education and support did the program provide you?

HEA6.3

Asked By: ISR I



► Describe the referral agencies and partners you have identified to provide early and regular comprehensive prenatal and postnatal care. How and when do you obtain the schedule of appropriate medical and oral health examinations for enrolled pregnant women from their attending health care providers?

HEA6.1

Asked By: ISR II and ECD

► How do you assist pregnant women enrolled in your program to access prenatal and post partum care as needed, including assessment and counseling on their nutritional needs? How do you link them to community health providers through referrals?

HEA6.1

Asked By: ISR II and ECD

► How do you provide referrals for mental health interventions and follow-up for enrolled pregnant women, when needed? Describe how you provide services (e.g., referrals) for substance abuse prevention and treatment and post-partum depression.

HEA6.1

Asked By: ISR II and ECD

► Describe your program's visits to newborns. Who makes these visits and how do you ensure they occur within two weeks of the infant's birth? What is done during these visits to ensure the well-being of both the mother and infant?

HEA6.2

Asked By: ISR II and ECD

► How do you offer information on breastfeeding to pregnant and nursing mothers? What kinds of arrangements does your program offer in your centers to accommodate mothers who choose to nurse their infants?

HEA6.3

Asked By: ISR II and ECD

► Describe the types of prenatal education, including fetal development and risks of smoking and alcohol, labor and delivery, and postpartum recovery that you offer to enrolled pregnant mothers and their families. Do you use a curriculum especially for pregnant women?

HEA6.3

Asked By: ISR II and ECD



Document Review: Pregnant Women Files

► Review a sample of files of enrolled women who are currently pregnant or were pregnant during the program year (and health tracking system, if available). Determine whether the program assisted pregnant women in accessing comprehensive prenatal and post-partum services (or referrals) immediately following enrollment, or, if extenuating factors, as early as possible. Document evidence that all pregnant women have received information regarding:

- Early, continuing risk assessment;
- Health promotion and treatment on a schedule defined by a health care provider; and
- Mental health interventions and follow-up as appropriate.

HEA6.1

► Review the records of women who have delivered a baby within the last year for information on visits to newborns. Document evidence that visits occurred two weeks after birth. If visits did not occur within two weeks describe why they did not occur, and document whether they ever occurred prior to the review.

HEA6.2

► Summarize the educational experience and information that is received by pregnant women. Document evidence that all pregnant families are educated about the following:

- Fetal development, labor and delivery, and postpartum recovery;
- Risks from smoking and alcohol;
- Maternal depression;
- Breastfeeding benefits; and
- Nutritional assessment, counseling and food assistance, as needed.

HEA6.3



Introduction: Nutrition Services

Promoting the nutritional well-being of children is another vital component of the Head Start program. Head Start's goal in this service area is to help ensure that children are getting the nutritional services they need and that programs are working with parents to ensure they are developing positive attitudes toward their child's and family's nutrition. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of staff qualifications and training, the process for assessing and planning nutrition services, the implementation of USDA and CACFP requirements, and the methods for providing nutrition education to families. Their analysis will also include examining the program's policies and procedures designed to provide nutrition services.

The **Nutrition Services** section of the Protocol is divided into four (4) Compliance Frameworks:

- Staff Qualifications
- Assessing and Planning
- Managing Nutrition Services
- Integrating Nutrition into Early Childhood Development



Nutrition Services

Nutrition Services Framework #1 - Staff Qualifications - Nutrition Services

The grantee ensures effective oversight, coordination, and management of the program’s nutrition services by hiring qualified staff and/or consultants and ensuring they have adopted the functions of the area.

Compliance Indicators:

1.1 The program hires staff or consultants as content area experts to oversee and support nutrition services who are registered dietitians or nutritionists.	1304.52(d)(3)
--	---------------

1.2 The program ensures that the program management functions for nutrition services are formally assigned to and adopted by staff within the program. Note: There is a distinction between the content area expert and the service area manager. One person can fill both of the roles. However, the content area expert must meet all of the qualification requirements as outlined in the performance standards. The Manager or Coordinator does not need to meet these qualifications but must receive expert knowledge and oversight from a Content Area Expert.	1304.52(a)(2)(ii), 1304.52(b)(1)
--	-------------------------------------

Targeted Questions for Nutrition Services Framework #1 - Staff Qualifications - Nutrition Services

Interview: Nutrition Content Area Expert (Staff Qualifications and Expertise)

- ▶ Describe your training or experience related to diet and nutrition.
NUT1.1
- ▶ Describe your process for regular staff oversight, monitoring the provision of nutrition services, what you do when problems are identified, and how you use the community and self assessment in program planning to continually improve health services.
NUT1.1

Staff Files: Nutrition Content Area Expert (Staff Qualifications and Expertise)

- ▶ Review documentation of the training, experience, and qualifications in employee files and/or consultant contracts to determine whether the program is supported by a content expert who is a registered dietitian or nutritionist. If there is more than one individual serving in this role, please document the qualifications of each.
NUT1.1

Interview: Nutrition Coordinator (Staff Qualifications and Expertise)

- ▶ Describe how your knowledge, skills, and experience assist you in performing your assigned functions in the area of nutrition services responsibly.
NUT1.2



Staff Files: Nutrition Coordinator (Staff Qualifications and Expertise)

► Determine who is formally assigned to the functions of managing nutrition services. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

NUT1.2

**Nutrition Services****Nutrition Services Framework #2 - Assessing and Planning - Nutrition Services**

The program designs and implements nutrition services that promote the healthy development of enrolled children through a process of working with families to assess, plan for and individualize nutrition services to meet their child's nutritional needs, feeding requirements, and cultural and ethnic preferences.

Compliance Indicators:

2.1 Program staff and families work together to identify each child's nutritional needs, utilizing relevant information from nutrition assessment data, family eating patterns and cultural preferences, special dietary requirements for children with disabilities, nutrition-related health problems, and infants and toddlers.	1304.23(a)(1), 1304.23(a)(2)
2.2 The program's nutrition program is designed and implemented to meet the nutritional needs and feeding requirements of each child, (including children with special medical or disabilities needs) and offer a variety of foods that consider cultural preferences and broaden children's food experiences.	1304.23(b)(1), 1304.23(c)(6)
2.3 Program staff ensures nutritional information of infants and toddlers, including feeding schedules, amounts and types of food, meal patterns, new foods, preferences and intolerances and any changes in these are communicated regularly to parents.	1304.23(a)(3)
2.4 Meal and snack periods are appropriately scheduled and adjusted to meet the individual needs of children, including serving a nutritious breakfast to children who have not received breakfast prior to arrival at the program, and feeding infants and toddlers "on demand".	1304.23(b)(1)(iii), 1304.23(b)(1)(vii)
2.5 Parents and community partners are involved in planning and evaluating Head Start and Early Head Start nutrition services.	1304.23(b)(4)

Targeted Questions for Nutrition Services Framework #2 - Assessing and Planning - Nutrition Services

Child Files: Nutrition Assessment and Planning

- ▶ Does the child have special dietary needs?

NUT2.1

NUT2.2

- ▶ Has the program made the required accommodations to meet these needs?

NUT2.1

NUT2.2

- ▶ Review parent contact logs or daily child notes, if available. Is there documentation that staff communicate regularly with parents about their child's nutritional needs?

NUT2.1



Interview: Nutrition Coordinator (Assessment and Planning)

► Describe your system for program staff and families working together to assess and plan for each child's nutritional needs, including any special dietary requirements for children with disabilities, children with nutrition-related health problems, and/or infants and toddlers.

NUT2.1

NUT2.2

► How do you discuss with families their cultural, religious, ethnic, or personal food preferences for their children? How do you discuss nutrition-related health problems that require special dietary considerations, such as obesity, iron deficiency, failure-to-thrive, food allergies and intolerances, milk allergies, and lactose intolerance?

NUT2.1

► How do you share information and plan with teaching and food preparation staff for a child that has a disability, food allergy, medically based dietary need, cultural preference or other special dietary need requiring accommodation?

NUT2.1

NUT2.2

► Describe how staff individualize feeding or meal schedules for infants and toddlers to meet differences in eating patterns or food preferences.

NUT2.2

NUT2.4

Applies To: Center-based or family child care programs serving infants and toddlers

► Describe how parents and appropriate community partners are involved in planning and evaluating nutrition services. Can you show documentation of planning and evaluation meetings, evaluations, surveys, etc. to verify their involvement?

NUT2.5

Interview: Food Preparation Staff and Nutrition Coordinator (Assessment and Planning)

► How do you know when and how you need to modify a menu for a child with disabilities, food allergies, cultural preference or other medically based or special dietary needs? How do you take nutritional assessment data into consideration? How do you accommodate special medical or dietary needs?

NUT2.1

NUT2.2

Document Review: Menus

► Review menus and determine whether the program serves a variety of foods that are considered culturally and ethnically diverse and broaden the children's food experience.

NUT2.2

Applies To: Center-based or family child care programs serving preschool-age children

Interview: Parent (Nutrition Services)

► How and how often does the program communicate with you about your child's daily diapering/toileting needs and intake of food?

NUT2.3

Applies To: Programs serving infants and toddlers

Asked By: ISR I



► If your child arrives late to the Head Start classroom or Family Care provider and has not had breakfast does the program provide breakfast to your child?

NUT2.4

Applies To: Center-based or family child care programs

Asked By: ISR I

Interview: Teacher and Family Child Care Provider (Meals, Nutrition and Oral Hygiene)

► How often do you communicate with parents about:

- Frequency and manner of feeding;
- Introduction of solid foods and other new foods;
- Daily elimination patterns of each child;
- Food intolerances and preferences of each child; and
- Quantity and consumption of foods at home and school?

NUT2.3

Applies To: Programs serving infants and toddlers

Asked By: ECD

► Do children receive breakfast every morning? Describe your procedures for meeting the needs of children when they arrive after breakfast has been served.

NUT2.4

Asked By: ECD

Observation: Nutrition

► Observe meals and snack time. Were necessary modifications for special needs of individual children evident? Make notes to verify modifications and scheduled times observed.

When observing an infant or toddler classroom, note how children were “fed on demand” or at appropriate intervals, and that foods are modified based on each child’s skills and readiness level.

NUT2.4

Observed By: ECD



Nutrition Services

Nutrition Services Framework #3 - Managing Nutrition Services - Nutrition Services

The program promotes children's healthy growth and development by ensuring that all meals and snacks conform to age appropriate recommended dietary allowances and requirements established by the USDA and CACFP and by ensuring the safe storage, handling and preparation of food.

Compliance Indicators:

3.1 Preschool-age children receive the quantities and kinds of foods that meet the nutritional needs of children and that conform to serving sizes and minimum standards for meal patterns recommended by the CACFP, including special attention to ensuring that foods served are high in nutrients and low in fat, sugar and salt.	1304.23(b)(1)(v), 1304.23(b)(1)(vi), 1304.23(b)(1)(ii)
3.2 Infants and toddlers receive food appropriate to their nutritional needs, developmental readiness, and feeding skills, as recommended in the USDA meal pattern or nutrient standard menu planning requirements.	1304.23(b)(1)(iv)
3.3 Home-based programs provide appropriate snacks and meals to each child during group socialization activities.	1304.23(b)(2)
3.4 USDA Food and Consumer Services Child Nutrition Programs funds are utilized as the primary source of payment for meal services.	1304.23(b)(1)(i)
3.5 The program complies with all applicable food preparation safety and sanitation laws, including contracting with only licensed food service vendors. Proper breast milk storage and handling facilities are available at facilities serving infant and toddlers.	1304.23(e)(1), 1304.23(e)(2)

Targeted Questions for Nutrition Services Framework #3 - Managing Nutrition Services - Nutrition Services

Interview: Nutrition Coordinator (Appropriate Foods)

► How do you ensure that each child receives meals and snacks that follow recommended allowances to meet a child's daily nutritional needs through:

- Meals and snacks of part day programs provide at least one-third of each child's daily nutritional needs
- Meals and snacks of full day programs (depending on length of day) provide at least two-thirds of each child daily nutritional needs

NUT3.1

Applies To: Center-based or family child care programs serving preschool-age children



- ▶ How do you plan and make sure that infants and toddlers receive food appropriate to their nutritional needs, developmental readiness, and feeding skills, as recommended in the USDA meal pattern or nutrient standard menu planning requirements?

Listen for explanations for how staff ensure the following:

- Foods posing health risks (e.g. peanut butter, honey, eggs) are not offered to children younger than 1 year old.
- Foods posing a high risk of choking for infants and toddlers (e.g., hot dogs, whole grapes, hard raw vegetables, popcorn, whole nuts) are not given to them.

NUT3.2

Applies To: Center-based or family child care programs serving infants and toddlers

- ▶ How do you ensure that appropriate snacks and meals (e.g., formula, baby food) are provided to infants and toddlers during socializations?

NUT3.3

Applies To: Home-based programs serving infants and toddlers

Document Review: Menus

- ▶ Verify whether menu planning complies with USDA requirements. Your notes should describe how the program complies or does not comply with USDA requirements. Document how you know the nutritional content of the foods offered, and if foods are high in fat, sugar, or salt, describe how you know their nutritional content.

NUT3.1

NUT3.2

Applies To: Center-based or family child care programs

- ▶ Review menus, diet intake records, or feeding records to ensure that foods posing health or choking risks are not included in menus offered to infants and toddlers.

NUT3.2

Applies To: Center-based or family child care programs serving infants and toddlers

- ▶ Review menus for socializations to determine whether the program serves appropriate food and snacks.

NUT3.3

Applies To: Home-based programs

Interview: Home Visitor (Meals, Nutrition and Oral Hygiene)

- ▶ For the meals and snacks provided during socialization, how do you accommodate children's nutritional needs, including food allergies, medically based needs, or other special dietary needs?

NUT3.3

Asked By: ECD

Interview: Fiscal Officer (Meals, Nutrition and Oral Hygiene)

- ▶ What funds are used to pay for meals and snacks (including formula) in your Head Start and/or Early Head Start program?

NUT3.4

Asked By: Fiscal



Interview: Nutrition Coordinator (Food Safety)

► How do you assure that food service vendors observe Federal, State, local, or Tribal safety and sanitation regulations related to food handling? Can you show documentation of your program's compliance with food safety and sanitation laws?

NUT3.5

SAF3A

► How do you assure there are appropriate facilities for handling and storing breast milk?

NUT3.5

Applies To: Center-based or family child care programs serving infants and toddlers

Observation: Safe Environments Center-based Checklist and Safe Environments Family Child Care Checklist (Food Safety)

► Does the program post evidence of compliance with food and safety sanitation laws?

NUT3.5



Nutrition Services

Nutrition Services Framework #4 - Integrating Nutrition into Early Childhood Development - Nutrition Services

Through the provision of nutritional services, the program provides opportunities for child development, socialization and healthy behaviors by contributing to children’s oral health and by promoting positive attitudes toward child and family nutrition.

Compliance Indicators:

4.1 Effective oral hygiene is promoted among children in conjunction with meals.	1304.23(b)(3)
4.2 Children’s development and socialization are supported through nutrition services by providing sufficient time for each child to eat, ensuring that food is not used as punishment or reward and by encouraging each child, without force, to eat or taste food.	1304.23(c)(2), 1304.23(c)(3)
4.3 Nutrition services contribute to children’s development and socialization by ensuring that all toddlers, preschool children, and assigned classroom staff, including volunteers, eat together family style, and share the same menu to the extent possible.	1304.23(c)(4)
4.4 Nutrition services contribute to children’s development and socialization by ensuring that infants are held while being fed rather than being laid down to sleep with a bottle.	1304.23(c)(5)
4.5 Nutrition services contribute to child and family positive behaviors by engaging children in food-related experiences and providing parent education opportunities to enhance nutrition related skills.	1304.23(c)(7), 1304.23(d)

Targeted Questions for Nutrition Services Framework #4 - Integrating Nutrition into Early Childhood Development - Nutrition Services

Interview: Nutrition Coordinator (Promoting Healthy Behaviors)

► Describe your procedures for tooth brushing (and in infant and toddler classrooms the procedure of gum-wiping). When and how often does this occur? What are other ways that oral hygiene is promoted in classrooms (and during home visits)?

NUT4.1

► How does your program promote positive nutrition behaviors through child food experiences in the classroom (and on home visits)? What kind of education opportunities are offered to parents either individually or as a group to assist them in developing their food preparation and nutritional skills?

NUT4.5

Interview: Teacher and Family Child Care Provider (Promoting Healthy Behaviors)

► Describe how the program promotes effective oral hygiene among children in conjunction with meals.

NUT4.1

Asked By: ECD



Interview: Home Visitor (Meals, Nutrition and Oral Hygiene)

- ▶ How do you promote oral hygiene during home visits?

NUT4.1

Asked By: ECD

- ▶ How do you work with parents to plan and implement nutrition activities for home visits and group socializations?

NUT4.5

Asked By: ECD

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations

- ▶ Describe observed tooth-brushing and/or gum-wiping activities and when they occur.

NUT4.1

- ▶ During meal service do children have adequate time to eat? Are slower eaters given enough time to finish their food?

NUT4.2

- ▶ Describe how staff implement family-style meals. For example:

- Is conversation shared during the meal?
- If the program serves prepackaged food, are providers still sitting with the children during meals and snacks?
- Do providers or other designated staff use mealtime as an opportunity to model language, conversation, and social interaction and to introduce nutritious foods?

NUT4.3

- ▶ How do staff ensure that infants are held while being fed rather than being laid down to sleep with a bottle? Document your observations.

NUT4.4

ECD5.6

Applies To: Programs serving infants and toddlers

Interview: Teacher and Family Child Care Provider (Meals, Nutrition and Oral Hygiene)

- ▶ What steps do you take to ensure that children have adequate time to eat and that slower eaters are given enough time to finish their food?

NUT4.2

Asked By: ECD

- ▶ How do you introduce and encourage children to try new foods? How do you respond to children that do not want to eat all the food offered? Is food used as a reward or punishment for children's behavior?

NUT4.2

Asked By: ECD

- ▶ Describe how you integrate food-related experiences into your classroom planning.

NUT4.5

Asked By: ECD



Interview: Parent (Nutrition Services)

► Can you describe how you have been involved in planning nutrition activities on home visits or group socializations?

NUT4.5

Applies To: Home-based programs

Asked By: ISR I

Document Review: Nutrition Policies and Procedures

► Review classroom plans, home visit plans, or other written documentation of planned food related experiences to determine whether these experiences involving children are being planned and implemented.

NUT4.5



Introduction: Safe Environments

Safety is a priority in Head Start programs. Head Start's goal in this area is to ensure that programs are providing safe environments, both inside and outside, for staff, children, and families. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of the safety of internal and external environments and materials, compliance with State/local certification and licensing requirements, group size and ratios, and sanitation and hygiene practices. Their analysis will also include examining the program's policies and procedures for safety drills and maintenance of first aid kits, training of staff, accommodating children with disabilities, and food safety and sanitation.

The **Safe Environments** section of the Protocol is divided into four (4) subsections with Compliance Indicators for each subsection:

- Facilities, Materials, and Equipment
- Hygiene
- Food Safety and Sanitation
- Class Size and Staffing



Safe Environments

Safe Environments Compliance Indicator 1A

Do facilities used for center-based combination options, home-based group socialization activities, or family child care comply with State and local licensing requirements?

1306.30(c), 1306.35(d)

Targeted Questions for Safe Environments Compliance Indicator 1A

Document Review: Facility License

► Does the program have a license, if required by State, local, or Tribal regulations? If the program has not obtained a license please investigate and document why they have not met this standard.

1306.35(d)

Applies To: Family child care programs

► Is the facility license current? Where licensing standards are less stringent than Head Start Program Performance Standards, or where no State or local licensing standards exist, determine whether the grantee or delegate complies with all standards under 1304.53(a).

1306.30(c)

Applies To: Center-based or home-based programs



Safe Environments

Safe Environments Compliance Indicator 1B

Does the program ensure that each facility or family child care home's space, light, ventilation, heat, and other physical arrangements are consistent with the health, safety, and developmental needs of children?

1304.22(a)(3),
1304.53(a)(10),
1304.53(a)(10)(i),
1304.53(a)(10)(iv),
1304.53(a)(10)(v),
1304.53(a)(10)(vi),
1304.53(a)(10)(vii),
1304.53(a)(10)(viii),
1304.53(a)(10)(x),
1304.53(a)(10)(xi),
1304.53(a)(10)(xii),
1304.53(a)(10)(xiv),
1304.53(a)(10)(xvi),
1306.35(b)(2),
1304.53(b)(1), 1304.22(c)(1)

Targeted Questions for Safe Environments Compliance Indicator 1B

Interview: Parent (Support Services for Families)

- ▶ Does the program provide diapers, wipes and formula for your child?

Applies To: Programs serving infants and toddlers

Asked By: ISR I

Document Review: Safe Environments Policies and Procedures

- ▶ Record the date of the last smoke detector check.

Interview: Facilities Coordinator (Environmental Safety)

- ▶ Describe the system in place to ensure the cleanliness, health, and safety of the facility, including daily monitoring of the cleanliness of indoor and outdoor premises.

Observation: Safe Environments Family Child Care Checklist

- ▶ Are children enrolled in the family child care program protected from potential hazards posed by appliances? Are premises free from pests? Are chemicals for controlling pests used only while children are not on the premises?
- ▶ Are radon detectors installed in family child care homes with a basement, where recommended by local health officials?
- ▶ Are smoke and carbon monoxide detectors installed and located properly?
- ▶ Do providers ensure that alcohol and drugs are not consumed while children are present? Do providers ensure that alcohol and drugs are inaccessible to children at all times?
- ▶ Do providers ensure that no firearms or other weapons are kept in areas occupied by children? Do providers ensure that firearms or other weapons are inaccessible to children at all times?



- ▶ Do providers ensure the safety of children when a body of water, a road, or other potential hazard is present or when children are being transported?
- ▶ Is there a fence to prevent children's unsupervised access to all water hazards, such as pools or other bodies of water?
- ▶ Do providers have a system of supervision in place that ensures the safety of children not within view for any period (e.g., the provider needs to use the bathroom or an infant is napping in one room while toddlers play in another)?
- ▶ Do providers secure health certificates for pets to document up to date immunizations and freedom from conditions that may pose a threat to children's health? Do providers ensure that pets are managed appropriately to ensure children's safety at all times?
- ▶ Are all child medications labeled and stored, under lock and key, and refrigerated, if necessary? Is emergency medication (e.g., EpiPen) stored out of children's reach yet accessible quickly?

Observation: Safe Environments Center-based Checklist

- ▶ Are approved fire extinguishers readily available to staff?
- ▶ Are classrooms well lit? Is emergency lighting available in case of a power failure?
1304.53(a)(10)(iv)
- ▶ Are electrical outlets accessible to children covered or maintained to prevent shock?
1304.53(a)(10)(xi)
- ▶ Are areas used for diapering and toileting separate from areas used for cooking, eating, and children's activities?
1304.53(a)(10)(xiv)
- ▶ Are emergency evacuation routes posted and safety procedures for emergencies (e.g., fire or weather-related) practiced regularly?
1304.22(a)(3)
- ▶ Are exits clearly visible and evacuation routes clearly marked and posted so the path to safety outside is unmistakable?
1304.53(a)(10)(vii)
- ▶ Are garbage and trash stored and disposed of in a safe, sanitary manner?
1304.53(a)(10)(xvi)
- ▶ Are heating and cooling systems insulated to protect children and staff from injuries such as burns?
1304.53(a)(10)(i)
Applies To: Programs in climates that require heating or cooling systems or both
- ▶ Are smoke detectors installed and tested regularly?
1304.53(a)(10)(vi)



- ▶ Are windows and glass doors constructed, adapted, or adjusted to prevent injury to children? Look for a seal on the safety glass.

1304.53(a)(10)(xii)

- ▶ Are all child medications labeled and stored, under lock and key, and refrigerated, if necessary? Is emergency medication (e.g., EpiPen) stored out of children's reach yet accessible quickly?

1304.22(c)(1)

- ▶ Does the program ensure that indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions?

1304.53(a)(10)(viii)

- ▶ Are playground equipment and surfaces maintained to minimize injury to children?

1304.53(a)(10)(x)

Document Review: Facility Cleaning Log

- ▶ Describe how the program logs its daily cleaning of the indoor and outdoor premises.

1304.53(a)(10)(viii)



Safe Environments

Safe Environments Compliance Indicator 1C

APPLIES ONLY TO: Programs serving infants and toddlers

Are mattresses used for infants firm, and is soft bedding, such as comforters, pillows, fluffy blankets, or stuffed toys avoided?

1304.53(b)(3)

Targeted Questions for Safe Environments Compliance Indicator 1C

Observation: Safe Environments Family Child Care Checklist and Safe Environments Center-based Checklist

- ▶ Are mattresses used for infants firm?
- ▶ Is the sleeping area free of soft bedding such as comforters, pillows, fluffy blankets, or stuffed toys? If soft bedding is found please alert the RTL to have the bedding removed (soft bedding can lead to SIDS). Determine why there was inappropriate bedding and create a systems level finding that allows the program to permanently correct this safety issue.



Safe Environments

Safe Environments Compliance Indicator 1D

APPLIES ONLY TO: Programs serving infants and toddlers

Are all infant and toddler toys made of nontoxic materials and sanitized regularly?

1304.53(b)(2)

Targeted Questions for Safe Environments Compliance Indicator 1D

Interview: Teacher, Family Child Care Provider and Facilities Coordinator (Facilities and Equipment Safety)

► How and when do you sanitize toys? What products do you use to sanitize toys? Can you show me the product?

Asked By: ECD and ISR II

Observation: Safe Environments Family Child Care Checklist and Safe Environments Center-based Checklist

► When and how often are toys sanitized? Review toy sanitizing schedule, if available.



Safe Environments

Safe Environments Compliance Indicator 1E

APPLIES ONLY TO: Center-based or family child care programs

Does the program have adequate usable indoor and outdoor space?

1304.53(a)(5), 1306.35(a)(3)

Targeted Questions for Safe Environments Compliance Indicator 1E

Observation: Safe Environments Center-based Checklist

► Are there at least 35 square feet of usable indoor space--excluding bathrooms, halls, kitchen, staff rooms, and storage space--and 75 square feet of usable outdoor space per child?

1304.53(a)(5)

► Calculate square footage per child using the number of children enrolled in that classroom. Indicate the number of children currently enrolled in the classroom and the measurement of the current classroom space.

Observation: Safe Environments Family Child Care Checklist

► Does each family child care home have sufficient indoor and outdoor space usable and available to children?

1306.35(a)(3)



Safe Environments

Safe Environments Compliance Indicator 1F

APPLIES ONLY TO: Center-based or family child care programs

Are outdoor play areas at center-based and family child care programs arranged to prevent children from getting into both unsafe and unsupervised areas? Does the program ensure that children en route to play areas are not exposed to vehicular traffic without supervision?

Note: Fences are not required. However, where fences, walls, or other barriers are present, they, themselves, must not pose a safety hazard. If they do pose a safety hazard, refer to compliance indicator SAF1H.

1304.53(a)(9)

Targeted Questions for Safe Environments Compliance Indicator 1F

Interview: Teacher and Family Child Care Provider (Safety)

▶ How do you ensure that children are supervised at all times?

Asked By: ECD

▶ How do you prevent children from getting into unsafe areas?

Asked By: ECD

▶ Are children exposed to vehicular traffic when en route to play? If so, how do you keep children safe?

Asked By: ECD

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations

▶ Observe outdoor play areas when children are present. Are children supervised in the play area at all times? How do staff work around any "blind spot" to ensure they can see all of the children?



Safe Environments

Safe Environments Compliance Indicator 1G

APPLIES ONLY TO: Programs serving infants and toddlers

Does the program ensure that the indoor and outdoor space in Early Head Start (EHS) or Head Start (HS) centers in use by mobile infants and toddlers is separated from general walkways and from areas in use by preschoolers?

1304.53(a)(4)

Targeted Questions for Safe Environments Compliance Indicator 1G

Observation: Safe Environments Center-based Checklist

- ▶ Are indoor and outdoor spaces at center-based programs in use by mobile infants and toddlers separated from general walkways and from areas in use by preschoolers? If not, describe the space observed.



Safe Environments

Safe Environments Compliance Indicator 1H

Does the program provide for maintenance, repair, safety, and security of all Head Start facilities and equipment?

1304.53(a)(7)

Targeted Questions for Safe Environments Compliance Indicator 1H

Interview: Facilities Coordinator (Facilities and Equipment Safety)

- ▶ What is the budget allocation for ensuring that Head Start facilities and equipment are maintained, repaired, safe and secure?
- ▶ An unsafe condition was observed at one or more centers. Describe the unsafe condition observed to the Facilities Coordinator and ask: What is the system for addressing facilities and equipment that are unsafe or need repair? Did your process fail, or can you describe what happened in this circumstance?

Interview: Facilities Coordinator, Teacher and Family Child Care Provider (Facilities and Equipment Safety)

- ▶ Whom do you tell when facilities and equipment are unsafe or need repair?

Asked By: ISR II and ECD

Observation: Health and Safety Family Child Care Observations and Health and Safety Center-based Observations

- ▶ Observe the facilities and equipment, and describe anything that is unsafe or needs repair, if applicable.



Safe Environments

Safe Environments Compliance Indicator 11

APPLIES ONLY TO: Center-based or family child care programs

Do the program's facilities provide adequately for children with disabilities to ensure their safety, comfort, and participation?

1304.53(a)(10)(xvii),
1304.53(b)(1)(iii)

Targeted Questions for Safe Environments Compliance Indicator 11

Document Review: Grant Application Budget Instrument (GABI)

- ▶ Does the budget allocate funds for purchase and upkeep of equipment, toys, materials, and furniture that are age appropriate, safe, and supportive of children with disabilities?

Reviewed By: Fiscal

Interview: Disabilities Coordinator (Adaptation for Children with Disabilities)

- ▶ What steps are taken to ensure that all equipment, toys, materials, and furniture are age appropriate, safe, and supportive of children with disabilities?

Asked By: ISR I

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations

- ▶ Observe indoor and outdoor spaces, and describe how provisions are made for children with disabilities to ensure their safety, comfort, and participation.



Safe Environments

Safe Environments Compliance Indicator 1J

APPLIES ONLY TO: Center-based or family child care programs

Does the program ensure that the environment is free of toxins, air pollutants, and water contaminants?

1304.53(a)(8),
1306.35(b)(2)(i)

Targeted Questions for Safe Environments Compliance Indicator 1J

Interview: Facilities Coordinator (Environmental Safety)

- ▶ When was the last time the program's environment was sprayed with herbicides or pesticides? When did children return to the area after spraying?
- ▶ Has the center been tested for lead (e.g., paint, soil)? If so, were lead levels considered safe? If lead levels are high, what steps have been taken to eliminate children's exposure to lead while in the center?

Observation: Safe Environments Family Child Care Checklist

- ▶ Does the Family Child Care program maintain a smoke-free environment?

Observation: Safe Environments Center-based Checklist

- ▶ Does the program maintain a smoke-free environment on center grounds?

Document Review: Licensing or Inspection Report

- ▶ If available, review recent licensing reports or environmental inspection reports. What, if any, concerns were noted in the reports? Are issues in the process of being corrected?



Safe Environments

Safe Environments Compliance Indicator 2A

Do staff, volunteers, and children wash their hands with soap and running water?

Note: Refer to Safe Environments compliance indicator 3A with reference to local requirements for hand-washing after food preparation or handling.

1304.22(e)(1)(i),
1304.22(e)(1)(ii),
1304.22(e)(1)(iii),
1304.22(e)(1)(iv),
1304.22(e)(2)(i),
1304.22(e)(2)(ii),
1304.22(e)(2)(iii)

Targeted Questions for Safe Environments Compliance Indicator 2A

Observation: Safe Environments Center-based Checklist and Safe Environments Family Child Care Checklist

- ▶ Do staff, volunteers, and children wash their hands with soap and running water:
 - After diapering or toilet use,
 - Before food preparation, handling, consumption, or any other food-related activity,
 - Whenever hands are contaminated with blood or other bodily fluids, and
 - After handling pets or other animals?
- ▶ Do staff and volunteers wash their hands with soap and running water:
 - Before and after giving medications,
 - Before and after treating or bandaging a wound (nonporous gloves should be worn if there is contact with blood or blood-containing body fluids), and
 - After assisting a child with toilet use?



Safe Environments

Safe Environments Compliance Indicator 2B

Are spilled bodily fluids cleaned up and disinfected immediately according to professionally established guidelines? Are tools and equipment used to clean spills disinfected promptly? Are blood-contaminated materials disposed of in a plastic bag with a secure tie?

1304.22(e)(4), 1304.22(e)(3)

Targeted Questions for Safe Environments Compliance Indicator 2B

Document Review: Safe Environments Policies and Procedures

- ▶ Review the program's policies for spilled bodily fluids. Do policies comply with Occupational Safety and Health Administration guidelines?

Interview: Family Child Care Provider and Teacher (Safety)

- ▶ What would you do if a spill of bodily fluids occurred?

1304.22(e)(4)

Asked By: ECD

- ▶ Do staff and volunteers wear nonporous gloves when in contact with blood or other visibly bloody bodily fluids?

1304.22(e)(3)

Asked By: ECD

Observation: Health and Safety Family Child Care Observations and Health and Safety Center-based Observations

- ▶ If you observe the cleanup of bodily fluids, describe how it was handled.

1304.22(e)(4)

- ▶ If you observe a situation requiring use of nonporous gloves (e.g., cleanup of blood), describe whether nonporous gloves are available to staff, where the gloves are kept, and when staff determine they would use them.



Safe Environments

Safe Environments Compliance Indicator 2C

Does the program adopt sanitation and hygiene practices for diapering that protect children and staff's health and safety adequately?

1304.22(e)(5)

Targeted Questions for Safe Environments Compliance Indicator 2C

Interview: Teacher and Family Child Care Provider (Diapering)

► What is the practice for changing children's diapers?

1304.22(e)(5)

Asked By: ECD

Observation: Health and Safety Family Child Care Observations and Health and Safety Center-based Observations

► Describe diapering practices in detail, where the practices occurred, how many occasions you observed them, and who was involved.

1304.22(e)(5)



Safe Environments

Safe Environments Compliance Indicator 2D

APPLIES ONLY TO: Center-based or family child care programs

Are potties emptied into the toilet and cleaned and disinfected after each use in a utility sink for that purpose?

1304.22(e)(6)

Targeted Question for Safe Environments Compliance Indicator 2D

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations

► Describe practices related to potty use, including where and on how many occasions you observed them and who was involved. Also note the presence of a utility sink and whether the utility sink was used.

1304.22(e)(6)



Safe Environments

Safe Environments Compliance Indicator 2E

Does the program ensure that first aid kits are well supplied, age appropriate, and readily accessible to staff (but not children) at each facility and while offsite?

1304.22(f)(1), 1304.22(f)(2)

Targeted Questions for Safe Environments Compliance Indicator 2E

Interview: Health Coordinator (First Aid Kits)

- ▶ When are first aid kits restocked? When is the inventory of first aid kits conducted?

Observation: Safe Environments Family Child Care Checklist and Safe Environments Center-based Checklist

- ▶ Look at the first aid kits and indicate whether:

1304.22(f)(1)

- Kits are well supplied and appropriate for ages served and program size,
- Items in kits are within the expiration date, if applicable,
- All staff working with children know where the kits are located,
- Kits are kept out of children's reach, and
- Program has a portable first aid kit for use on trips to offsite locations or on the playground.

Observation: Bus Inspection

- ▶ Does the vehicle providing transportation services have a well-stocked first aid kit?

TRANS2A, 1310.10(d)(3)



Safe Environments

Safe Environments Compliance Indicator 3A

Does the program ensure that all applicable Federal, State, local, and Tribal food safety and sanitation laws are met and evidence of compliance, including appropriate licenses and certificates, is posted?

1304.23(e)(1),
1304.53(a)(10)(xiii)

Targeted Questions for Safe Environments Compliance Indicator 3A

Interview: Nutrition Coordinator (Food Safety)

► How do you assure that food service vendors observe Federal, State, local, or Tribal safety and sanitation regulations related to food handling? Can you show documentation of your program's compliance with food safety and sanitation laws?

NUT3.5

Interview: Facilities Coordinator (Environmental Safety)

► Is the water supply adequate and approved by the State or local health authority? Can you show me documentation of licensing inspection? Record the date of the most recent inspection.

Document Review: Facility License

► Indicate whether the grantee and delegate have available all licenses and certificates that permit them to handle and serve food and whether such licenses and certifications are posted.

1304.23(e)(1)



Safe Environments

Safe Environments Compliance Indicator 3B

APPLIES ONLY TO: Programs serving infants and toddlers

Does the program ensure that facilities are available for proper refrigerated storage and handling of breast milk and formula?

1304.23(e)(2)

Targeted Questions for Safe Environments Compliance Indicator 3B

Interview: Teacher and Family Child Care Provider (Safety)

- ▶ What precautions are taken to ensure each child receives his or her own mother's breast milk or the correct formula? How do staff and parents communicate to ensure containers of breast milk or formula are dated, labeled clearly with the child's name, and used only for the intended child?

Asked By: ECD



Safe Environments

Safe Environments Compliance Indicator 4A

APPLIES ONLY TO: Family child care programs

Does the program ensure appropriate group size?

Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes more stringent than this requirement, the State, local, or Tribal regulations must apply.

1306.20(g)(1), 1306.20(g)(2)

Targeted Questions for Safe Environments Compliance Indicator 4A

Document Review: Class Roster

- ▶ Review class rosters or other supporting documents for Family Child Care programs to determine the number of children enrolled in the class. How many children are enrolled? What is the predominate age of the children?
When examining this documentation, use which ever law is most stringent. If the state laws allow more children in a group size the Head Start requirements must be followed.

Observation: Safe Environments Family Child Care Checklist

- ▶ How many children are present in the family child care home? How many providers are hired for the group size? How many children are under age 2 years?
1306.20(g)(1)
- ▶ How many infants and toddlers are present in the family child care home? How many children in the group are under age 18 months? How many providers are assigned to the group?
1306.20(g)(2)
Applies To: Programs serving infants and toddlers



Safe Environments

Safe Environments Compliance Indicator 4B

APPLIES ONLY TO: Center-based programs serving preschool-age children

Does the program ensure appropriate class size based on the age of the predominant number of children in the class?

Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes more stringent than this requirement, the State, local, or Tribal regulations must apply.

1306.32(a)(2),
1306.32(a)(3),
1306.32(a)(4),
1306.32(a)(5), 1306.32(a)(6)

Targeted Questions for Safe Environments Compliance Indicator 4B

Document Review: Class Roster

- ▶ Review class rosters or other supporting documents for preschool classrooms to determine the number of children enrolled in the class. How many children are enrolled? What is the predominate age of the children?

Observation: Safe Environments Center-based Checklist

- ▶ How many children are present in the classroom? How many providers are hired for the group size?



Safe Environments

Safe Environments Compliance Indicator 4C

APPLIES ONLY TO: Center-based programs serving infants and toddlers

Does the program ensure that no more than eight children are placed in an infant and toddler room and no more than four children are assigned to each teacher?

Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes more stringent than this requirement, the State, local, or Tribal regulations must apply.

1304.52(g)(4)

Targeted Questions for Safe Environments Compliance Indicator 4C

Document Review: Class Roster

- ▶ Review class rosters or other supporting documents for infant and toddler classrooms to determine the number of children enrolled in the class. How many children are enrolled? What is the predominate age of the children?

Observation: Safe Environments Center-based Checklist

- ▶ How many children are in infant and toddler rooms? How many children are assigned to each teacher?
- 1304.52(g)(4)



Safe Environments

Safe Environments Compliance Indicator 4D

APPLIES ONLY TO: Center-based or family child care programs serving preschool-age children

Does each class have at least two paid staff in the classroom and, when possible, a third person who is a volunteer?

1306.20(c), 1306.20(e)

Targeted Questions for Safe Environments Compliance Indicator 4D

Observation: Safe Environments Center-based Checklist and Safe Environments Family Child Care Checklist

- ▶ How many paid staff are in the home or classroom?

Observation: Safe Environments Family Child Care Checklist and Safe Environments Center-based Checklist

- ▶ Are there volunteers in the classroom? If so, indicate how many.



Introduction: Transportation Services

Safety is a priority in Head Start programs. Head Start's goal in this area is to ensure that programs are providing safe methods of transportation for children. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of the program's transportation systems including staff qualifications, training, and licensure; schedule of bus inspection and maintenance; release of children; use of safety restraints; accommodation for children with disabilities; and emergency planning.

The **Transportation Services** section of the Protocol is divided into four (4) subsections with Compliance Indicators for each subsection:

- Transportation Services Management
- Providing Transportation Services
- Bus Driver Credentials, Qualifications, and Training
- Arranging for Transportation Services



Transportation Services

Transportation Services Compliance Indicator 1A

Does the program ensure that vehicles used to provide transportation services are maintained in safe operating condition at all times?

1310.13(a), 1310.13(b),
1310.13(c)

Targeted Questions for Transportation Services Compliance Indicator 1A

Document Review: State Vehicle Inspections

- ▶ Review the annual State inspection certificate of each vehicle provided by the State licensing agency, if applicable.

1310.13(a)

Interview: Bus Driver (Vehicle Maintenance and Inspection)

- ▶ Can you describe the preventive maintenance done for each vehicle?

1310.13(b)

- ▶ How often do you conduct a pre-trip inspection of the vehicle? What happens if something does not pass the pre-trip inspection? Describe how the inspection ensures that the vehicle is in safe operating condition.

1310.13(c)

Observation: Bus Inspection

- ▶ Describe the bus driver's pre-trip inspection. If the bus driver completes a pre-trip inspection form, review a copy of the form.



Transportation Services

Transportation Services Compliance Indicator 1B

Do programs providing transportation services, either directly or through a contract, have an applicant review process that advises applicants for driving positions of the specific background checks required?

1310.16(b)

Targeted Questions for Transportation Services Compliance Indicator 1B

Staff Files: Bus Driver and Transportation Coordinator (Staff Hiring Procedures)

- ▶ Review information in the file on background checks.
- Were background checks for the bus driver or the Transportation Coordinator completed?
- Indicate the date the background check was conducted.

Interview: Transportation Coordinator (Transportation Procedures)

- ▶ What is the program's process for background checks on their contracted bus drivers?

Interview: Head Start/Early Head Start Director (Background Checks)

- ▶ How do you ensure the specific background checks are conducted for contracted drivers?

Asked By: PDM

Interview: Bus Driver (Background Checks)

- ▶ Was a background check conducted when you were hired?



Transportation Services

Transportation Services Compliance Indicator 1C

Does each bus driver have a valid commercial driver's license (CDL)?

Note: This requirement only applies to bus drivers in States that grant CDLs.

1310.16(a)(1)

Targeted Questions for Transportation Services Compliance Indicator 1C

Staff Files: Bus Driver (Staff Hiring Procedures)

- ▶ Is the program located in a State that grants commercial driver's licenses (CDLs)?
- ▶ Does each bus driver have a valid commercial driver's license (CDL)?
 - Document the State where the CDL was issued.
 - Document the CDL expiration date to verify validity.



Transportation Services

Transportation Services Compliance Indicator 2A

Does the program ensure that each vehicle is properly equipped?

1310.10(d)(1),
1310.10(d)(2),
1310.10(d)(3),
1310.10(d)(4),
1310.12(b)(2), 1310.12(b)(1)

Targeted Questions for Transportation Services Compliance Indicator 2A

Observation: Bus Inspection

- ▶ Are vehicles equipped with reverse beepers?
1310.12(b)(2)
- ▶ Are vehicles equipped with height- and weight-appropriate restraint systems?
1310.12(b)(1)
- ▶ Does the vehicle providing transportation services have a seat belt cutter?
1310.10(d)(4)
- ▶ Does the vehicle providing transportation services have a well-stocked first aid kit?
SAF2E, 1310.10(d)(3)
- ▶ Is the vehicle equipped with a two-way communication system to call for assistance? Is there a back-up plan if the two-way communication system is not working (e.g., in drop zones)?
1310.10(d)(1)
- ▶ Is there a fire extinguisher on the bus and is it fully charged (check the gauge)?
1310.10(d)(2)



Transportation Services

Transportation Services Compliance Indicator 2B

Are baggage and other items transported in the passenger compartment properly stored and secured, aisles cleared, and doors and emergency exits unobstructed at all times?

	1310.15(b)
--	------------

Targeted Question for Transportation Services Compliance Indicator 2B

Observation: Bus Inspection

- ▶ Are baggage or other items transported in the passenger compartment properly stored?



Transportation Services

Transportation Services Compliance Indicator 2C

Does the program adhere to the basic principles of trip routing?

1310.20(b), 1310.20(b)(1),
1310.20(b)(6), 1310.20(b)(7)

Targeted Questions for Transportation Services Compliance Indicator 2C

Interview: Bus Driver (Transportation Safety)

- ▶ Does the bus monitor, or another adult, escort children when they have to cross the street?
1310.20(b)(6)
- ▶ What is the average time each child is on the bus, each way? Which child has the longest trip on the bus?
How long is it?
1310.20(b)(1)
- ▶ Describe procedures for using alternate routes in case of hazardous conditions.
1310.20(b)(7)



Transportation Services

Transportation Services Compliance Indicator 2D

DOES NOT APPLY TO: Programs with a waiver approved by ACF for this requirement

Is at least one bus monitor onboard at all times?

Note: An approval letter from ACF is required for an exception from this regulation.

1310.15(c)

Targeted Questions for Transportation Services Compliance Indicator 2D

Interview: Transportation Coordinator (Transportation Procedures)

- ▶ How are substitute monitors provided when the regular bus monitor is absent?
- ▶ Does the program have a waiver for the bus monitor requirement (1310.15(c))?

Interview: Bus Driver (Transportation Safety)

- ▶ How many bus monitors do you typically travel with onboard? How often do you travel without having a bus monitor onboard?



Transportation Services

Transportation Services Compliance Indicator 2E

Are children released only to a parent, legal guardian, or other individual as designated in writing by the parent or legal guardian? Does the agency maintain lists of the persons, including alternates in case of emergency, and up-to-date child rosters at all times to ensure that no child is left behind, either at the classroom or on the vehicle at the end of the route?

1310.10(g)

Targeted Questions for Transportation Services Compliance Indicator 2E

Interview: Transportation Coordinator (Transportation Procedures)

- ▶ How does the bus driver receive up to date information on children, especially when a contractor provides transportation services? Are children only released to those persons identified in writing by the parent or guardian?

Interview: Bus Driver (Transportation Safety)

- ▶ How do you receive up to date information on children?
- ▶ What process do you follow if no parent is at a stop to meet a child exiting the bus?
- ▶ How do you ensure that no child is left on the vehicle at the end of the route?

Interview: Bus Driver and Bus Monitor (Transportation Safety)

- ▶ How do you know the people to whom each child can be released when he or she exits the bus?



Transportation Services

Transportation Services Compliance Indicator 2F

Does the program providing transportation services ensure that all accidents involving vehicles that transport children are reported in accordance with applicable State requirements?

1310.10(f)

Targeted Question for Transportation Services Compliance Indicator 2F

Document Review: Driver Incident Reports

- ▶ Are accidents reported in accordance with applicable State requirements?

Interview: Transportation Coordinator (Transportation Procedures)

- ▶ How are families notified if a child is onboard a bus when an accident occurs?

Interview: Bus Driver (Transportation Safety)

- ▶ Have you ever been involved in an accident? If so, how was it reported?



Transportation Services

Transportation Services Compliance Indicator 3A

Does the program ensure that persons employed to drive vehicles receive the required behind-the-wheel and classroom training before transporting children and annually thereafter?

Note: This compliance indicator applies to both hired and contracted bus drivers.

1310.17(b)(1),
1310.17(b)(2),
1310.17(b)(3),
1310.17(b)(4),
1310.17(b)(5),
1310.17(b)(6), 1310.17(b)(7)

Targeted Questions for Transportation Services Compliance Indicator 3A

Staff Files: Bus Driver (Staff Training and Development)

- ▶ Did the bus driver receive the following classroom and behind-the-wheel training on how to:
 - Operate the vehicle safely and efficiently;
 - Run a fixed route safely, including loading and unloading children, stopping at railroad crossings, and performing other specialized driving maneuvers;
 - Administer basic first aid in case of injury;
 - Handle emergency situations, including vehicle evacuations;
 - Operate special equipment, such as wheelchair lifts, assistance devices or special occupant restraints;
 - Conduct routine maintenance and safety checks on the vehicle; and
 - Maintain accurate records; and
 - Determine what records are necessary?

1310.17(b)

Interview: Bus Driver (Training)

- ▶ What type of classroom and behind-the-wheel training have you received?
- ▶ Do you receive refresher behind-the-wheel and classroom training courses annually?

1310.17(d)

Document Review: Training Plans and Policies

- ▶ Describe the behind-the-wheel and classroom training procedures for bus drivers, noting how often bus drivers are required to participate in such training.



Transportation Services

Transportation Services Compliance Indicator 3B

Do bus drivers receive annual evaluations, which must include an onboard observation of road performance?

Note: This compliance indicator applies to both hired and contracted bus drivers.

1310.17(f)(1)

Targeted Question for Transportation Services Compliance Indicator 3B

Staff Files: Bus Driver (Staff Training and Development)

► Has the bus driver had an annual performance appraisal?

- Indicate the date of the bus driver's last performance review.
- Did the annual review include an onboard observation?
- Indicate the date of the onboard observation, which may be the same date as the performance appraisal.

Interview: Bus Driver (Performance Appraisals)

► Do you receive an annual evaluation that includes an onboard observation? When was your last evaluation and who conducted it?

PDM12.1



Transportation Services

Transportation Services Compliance Indicator 3C

Has each bus monitor, before duty, been trained on child boarding and exiting procedures, use of child restraint systems, required paperwork, emergency response and evacuation procedures, use of special equipment, child pickup and release procedures, and pre- and post-trip vehicle check?

Note: This requirement does not apply to programs with a waiver approved by the Administration for Children and Families (ACF) for this requirement. An approval letter from ACF is required for exception from this regulation.

1310.17(f)(2)

Targeted Questions for Transportation Services Compliance Indicator 3C

Interview: Bus Monitor (Training)

- ▶ What training did you receive on child boarding and exiting procedures, use of child restraint systems, required paperwork, emergency and evacuation procedures, use of special equipment, child pickup and release procedures, and pre- and post-trip vehicle checks?

Document Review: Training Plans and Policies

- ▶ Does the program have training procedures for bus monitors?



Transportation Services

Transportation Services Compliance Indicator 4A

Does the agency help as many families as possible obtain transportation who need transportation for their children to attend the program?

1310.10(a)

Targeted Question for Transportation Services Compliance Indicator 4A

Interview: FCP Coordinator (Support Services and Follow up)

► How does the agency help as many families as possible obtain transportation who need transportation for their children to attend the program?

Asked By: ISR I



Transportation Services

Transportation Services Compliance Indicator 4B

If the agency has decided not to provide transportation services for either all or a portion of the children, does the agency provide reasonable assistance to the families of such children to arrange transportation to and from its activities? Are the specific types of transportation assistance being offered made clear to all prospective families in the program's recruitment announcements?

1310.10(b)

Targeted Questions for Transportation Services Compliance Indicator 4B

Document Review: Recruitment Materials

► Are the specific types of transportation assistance being offered made clear to all prospective families in the program's recruitment announcements?

Reviewed By: ISR I

► If the agency has decided not to provide transportation services for either all or a portion of the children, describe how the agency provides reasonable assistance to the families of such children to arrange transportation to and from its activities. In your description, indicate whether program recruitment announcements are in the languages of the children and families served by the program.

Reviewed By: ISR I



Transportation Services

Transportation Services Compliance Indicator 4C

When special education and related services cannot be provided on site, has the program arranged for or provided transportation for children with disabilities to and from the program, special clinics, or other service providers?

Note: Transportation includes adapted buses equipped to accommodate wheelchairs or other such devices, if required.

1308.4(h)(6), 1310.22(a),
1310.22(b)

Targeted Questions for Transportation Services Compliance Indicator 4C

Interview: Transportation Coordinator (Transportation for Children with Disabilities)

- ▶ Are any special education or related services provided off site?
- ▶ Do you arrange for or provide transportation for children with disabilities to and from services?
1308.4(h)(6)
- ▶ Does the transportation comply with the Americans with Disabilities Act of 1990?
1310.22(b)
- ▶ How do you ensure that the transportation is adapted to meet a child's special needs?
1310.22(a)



Introduction: Disabilities Services

Head Start's goal in this area is to ensure the needs of children with disabilities and their families are supported and effectively included in the full range of program activities. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of how the program individualizes for children who need special or additional support and how the program partners with children's families. In addition, reviewers should see evidence that the program provides support and training to teachers and staff so they have the ability to provide the services necessary to meet the needs of the children and families. Their analysis will also include examining the program's processes and procedures designed to provide disabilities services.

The **Disabilities Services** section of the Protocol is divided into five (5) Compliance Frameworks:

- Staff Qualifications
- Program Planning and Management
- Coordination
- Delivering Individualized Services
- Partnering with Families of Children with Disabilities



Disabilities Services

Disabilities Services Framework #1 - Staff Qualifications - Disabilities Services

The grantee ensures effective oversight, coordination, and management of the program’s disabilities services by hiring qualified staff and/or consultants and ensuring they have adopted the functions of the area.

Compliance Indicators:

1.1 The program hires staff or consultants as content area experts to oversee disabilities services who have training and experience in securing and individualizing needed services for children and families.	1304.52(d)(7)
---	---------------

1.2 The program designates a staff or consultant to coordinate services for children with disabilities, including collaboration with other program coordinators (Education, Health, Mental Health and Nutrition) and staff.	1308.6(d), 1308.18(a), 1308.18(b), 1308.20(a)
---	--

1.3 The program ensures that the program management functions for disabilities services are formally assigned to and adopted by staff within the program.	1304.52(a)(2)(ii), 1304.52(b)(1)
---	-------------------------------------

Note: There is a distinction between the content area expert and the service area manager. One person can fill both of the roles. However, the content area expert must meet all of the qualification requirements as outlined in the performance standards. The Manager or Coordinator does not need to meet these qualifications but must receive expert knowledge and oversight from a Content Area Expert.

Targeted Questions for Disabilities Services Framework #1 - Staff Qualifications - Disabilities Services

Interview: Disabilities Content Area Expert (Staff Qualifications and Expertise)

► Describe your training or experience related to securing and individualizing needed services for children with disabilities. Additionally, describe your knowledge of the State’s requirements and timelines for implementing IDEA Services.

DIS1.1

► Describe how you develop the disability service plan and provide the program with regularly scheduled, ongoing expertise and oversight in the area of disabilities services.

DIS1.1

Staff Files: Disabilities Content Area Expert (Staff Qualifications and Expertise)

► Review the personnel file(s) of the Content Area Expert(s) and describe their training, experience, and qualifications in securing and individualizing needed services for children with disabilities.

DIS1.1



Interview: Disabilities Coordinator (Staff Coordination)

► How do you coordinate with the Education, Health, Nutrition, and Mental Health Coordinators and staff to ensure integration of services (including screening, assessment, health and mental health follow-up) for children with suspected and/or diagnosed disabilities?

DIS1.2

Interview: ECD Coordinator (Staff Coordination)

► How do you coordinate with the Disabilities Coordinator using information from developmental assessments for planning program and individualization of educational activities and experiences for children with disabilities?

DIS1.2

Asked By: ECD

Observation: Children with Disabilities

► Visit settings (classrooms, family child care homes, socializations, home visits) to observe the services provided to children with disabilities. Summarize the services, including information about the coordination of services among all service areas (Education, Health, Nutrition, and Mental Health). How does the Disabilities Coordinator support teachers who work with children with disabilities?

DIS1.2

Observed By: ECD

Interview: Health Coordinator (Staff Coordination)

► How do you coordinate services with the Disabilities Coordinator to ensure that health, dental and nutrition needs of children with disabilities are communicated and met, and that follow-up occurs?

DIS1.2

Asked By: ISR II

Interview: Nutrition Coordinator (Staff Coordination)

► How do you coordinate services with the Disabilities Coordinator to ensure that nutrition needs of children with disabilities are communicated and that follow-up occurs?

DIS1.2

Asked By: ISR II

Interview: Teacher and Family Child Care Provider (Staff Coordination)

► How are you made aware of special health, nutrition or mental health services needs of a child with disabilities in your care? Can you give an example?

DIS1.2

Asked By: ECD

Interview: Mental Health Coordinator (Staff Coordination)

► How do you coordinate services with the Disabilities Coordinator to ensure that mental health needs of children with disabilities are communicated, and that follow-up occurs?

DIS1.2



Interview: Disabilities Coordinator (Staff Qualifications and Expertise)

► Describe how your knowledge, skills, and experience assist you in performing your assigned functions in the area of disability services responsibly.

DIS1.3

Staff Files: Disabilities Coordinator (Staff Qualifications and Expertise)

► Determine who is formally assigned to the functions of managing disabilities services. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

DIS1.3



Disabilities Services

Disabilities Services Framework #2 - Program Planning and Managing - Disabilities Services

The program is designed and managed so children with disabilities and their families are supported and effectively included in the full range of program activities.

Compliance Indicators:

2.1 A Disabilities Services Plan has been developed and updated annually with input from parents, staff and community partners, is approved annually by the governing body and policy group(s), and is funded with adequate resources.	1308.4(a), 1308.4(b), 1308.4(m), 1304.51(a)(2)
2.2 Disabilities Plan strategies are used by staff to provide the full range of Head Start and/or Early Head Start services, providing modifications and budget support as necessary to meet the special needs of children with disabilities and their families.	1308.4(c), 1308.4(d), 1308.4(o)

Targeted Questions for Disabilities Services Framework #2 - Program Planning and Managing - Disabilities Services

Document Review: Disabilities Service Plan

► Describe the process for making updates to the Disabilities Service Plan to reflect changes in community needs.

- Has a disabilities service plan been developed and updated annually?
- Indicate the date it was last updated.

DIS2.1

► Describe the process for determining that adequate resources are allocated to implement disabilities service plan activities.

DIS2.1

► Describe evidence that the plan was developed through a coordinated effort that included the staff, community members, and approval from the governing body and policy groups.

DIS2.1

► Review the Disabilities Budget. Have resources been allocated to meet the special needs of enrolled children with disabilities? Were funds available for any special modifications that were necessary to support the participation of children with disabilities in the program?

DIS2.1

► Describe and identify strategies that ensure accessibility and appropriate materials and equipment are available to provide modifications so that children with disabilities can enjoy the full range of Head Start services.

DIS2.2

Interview: Disabilities Coordinator (Staff Coordination)

► How do you use the Disabilities Services Plan as a working document to guide how you identify, plan and implement Head Start services to enrolled children? How do you plan for providing necessary modifications?

DIS2.2

► How do LEA or Part C resources support these needs and modifications?



DIS2.2

► Describe how you ensure the full range of Head Start services are provided to enrolled children with disabilities.

DIS2.2

► Discuss and give examples of children with more significant disabilities who were enrolled and for whom your program may have needed to implement significant modifications and provide additional supports to enable their more effective inclusion in the full range of your program's activities.

DIS2.2

Interview: Teacher, Home Visitor and Family Child Care Provider (Staff Coordination)

► How are you supported in ensuring that children with disabilities in your setting receive the full range of services? Can you give examples of any modifications that were made to assist children to receive these services (e.g. purchase of special materials, equipment, transportation assistance, extra staff, etc.)?

DIS2.2

Asked By: ECD



Disabilities Services

Disabilities Services Framework #3 - Coordination - Disabilities Services

The grantee ensures that the program’s services to children with disabilities and their families are effectively coordinated with community partners, particularly the local education agencies (LEA) and Part C agencies responsible for implementing the Individuals with Disabilities Education Act (IDEA).

Compliance Indicators:

<p>3.1 A coordinated screening, assessment and referral process for all children identifies children suspected of having a disability as soon as the need becomes evident and that in partnership with the LEA and/or Part C Agencies results in timely referrals for further evaluation.</p>	<p>1308.6(a)(1), 1308.6(a)(2), 1308.6(a)(3), 1308.6(b)(1), 1304.20(f)(2)(ii), 1308.6(e)(1)</p>
<p>3.2 The program, in partnership with the LEA or Part C Agency, works to inform and engage parents in all plans for screenings and referrals for evaluation, including obtaining consents prior to evaluation procedures and ensuring confidentiality of information.</p>	<p>1308.6(c), 1308.6(e)(3), 1308.8(a)(4)</p>
<p>3.3 The program coordinates with and has current Interagency Agreements in place with Local Education Agencies (LEAs) and other agencies (Part C) within the service area.</p>	<p>1304.41(a)(4), 1308.4(h), 1308.4(l)</p>

Targeted Questions for Disabilities Services Framework #3 - Coordination - Disabilities Services

Child Files: Coordination of Disabilities Services

- ▶ Review documentation of this child's referral to the Part C provider or agency.
- Describe the program's referral process and timeline.
- Document the date the child’s disability was identified.
- Document the date the child was referred to the Part C provider.
- Did you identify any concerns with the date the child was referred to the Part C provider? If so, document your concerns.

Applies To: Programs serving infants and toddlers

DIS3.1

- ▶ Review referrals and follow-up logs for children with disabilities to LEAs for formal evaluation, if available.
- Document the date the child’s disability was identified.
- Document the date of referral for evaluation.
- Did you identify any concerns with referrals and follow-up logs? If so, document your concerns.

DIS3.1

Applies To: Programs serving preschool –age children

- ▶ Review parental consent forms.
- Were parental consent forms available for review?
- Document the date of evaluation by the LEA or Part C agency.
- Document the date parental consent was obtained.
- Document the date parental consent was obtained.

DIS3.2



Interview: Disabilities Coordinator (Interagency Agreement)

► Describe your efforts at coordinating with local LEAs, Part C Agencies and other providers of disabilities services. What types of collaboration does your agreement with the LEA and/or Part C Agencies include?

DIS3.1

DIS3.3

Interview: Disabilities Coordinator (Child Assessments)

► What is the process and timeline for referral for evaluation to the LEA or Part C agency when a child is suspected of having a disability? How do you ensure timeliness from the LEA or Part C Agency in responding to your referrals? How do you overcome barriers to coordination with these agencies?

Additional prompts for reviewer to use as needed:

- What is the procedure for moving from the multi-disciplinary team evaluation to obtaining an IEP/IFSP from the appropriate local agencies?
- What is the process for following up with the LEA to ensure that children are evaluated formally and in a timely manner?
- Describe the process and timeline for referral to Part C providers and services when an infant or toddler is suspected of having a disability?

DIS3.1

► Describe your screening and assessment process for identifying children who may be in need of further evaluation.

DIS3.1

► How are parents engaged, educated, and supported when participating in the decisions regarding evaluations and planning for disabilities services?

DIS3.2

► Describe the process for obtaining parent consents for screenings and evaluations. In your description, indicate the following:

- How and when do you obtain parental consent for evaluations?
- How are consents obtained from families who do not speak English?
- How do you ensure the confidentiality of this information?

DIS3.2

Interview: Teacher, Family Child Care Provider and Home Visitor (Child Assessments)

► How are you informed of screening results? What types of information alerts you that children may need further observation and possible referral for additional evaluation?

DIS3.1

Asked By: ECD

Interview: Parent (Parent Involvement)

► How and when did you give consent for your child to participate in screening and evaluations? How did the program explain the results to you? Do you participate in the decisions regarding your child's evaluations and individual program planning?

DIS3.2



Document Review: Interagency Agreement

- ▶ Based on your review of Interagency Agreements are there:
 - Current agreements that exist with LEAs and other agencies in the service area serving preschool age children; and/or
 - Current agreements that exist with agencies serving infants and toddlers (Part C or others)?

DIS3.3
- ▶ If agreements exist, document how you know these Interagency Agreements are current.

DIS3.3
- ▶ If current agreements do not exist, document whether the grantee documented its efforts to establish these agreements and informed its Regional Office if agreements could not be reached.

DIS3.3
- ▶ Indicate whether the agreements specify an array of services that would enable children with disabilities and their families to fully participate in the program, and describe the array of services.

DIS3.3



Disabilities Services

Disabilities Services Framework #4 - Delivering Individualized Services - Disabilities Services

The program ensures that every child receiving services in Head Start and Early Head Start who has been evaluated, diagnosed with a disability and found to be in need of special education or early intervention services has a current IEP or IFSP in place and is supported by a learning environment, approach and services that address their needs.

Compliance Indicators:

4.1 Every child receiving services in Head Start and/or Early Head Start, who has been evaluated, determined to have a disability, and is in need of special education or early intervention, has an IEP or IFSP, implemented as soon as possible after the IEP meeting, outlining how special education, early intervention and related services are provided.	1308.19(b), 1308.19(e)(4), 1308.19(e)(6), 1308.19(j), 1308.19(k), 1304.20(f)(2)(i)
4.2 The child development approach for children with disabilities is consistent with their Individual Education Plans (IEP/preschool) or Individualized Family Services Plans (IFSP/infants and toddlers).	1304.21(a)(1)(ii)
4.3 Learning environments are inclusive of children with disabilities and support their appropriate participation.	1304.21(a)(5)(iii)

Targeted Questions for Disabilities Services Framework #4 - Delivering Individualized Services - Disabilities Services

Interview: Disabilities Coordinator (Staff Coordination)

► Describe how you implement IEPs and IFSPs as soon as possible after the IEP/IFSP meeting by modifying the child’s program in accordance with the plan.

DIS4.1

► How do you verify that individual plans are working for children with disabilities? How do you support teachers in implementing plans or addressing any need to change plans?

DIS4.1

► How does the program encourage parents to be involved in the IEP and IFSP process?

DIS4.1

Interview: Parent (Parent Involvement)

► How did the program encourage you to be involved in developing your child’s IEP or IFSP?

DIS4.1

Child Files: Individualization

► Does the file contain an Individualized Education Program (IEP) or an Individualized Family Service Plan (IFSP)?

DIS4.1



- ▶ Review the child's Individualized Education Plan (IEP) or Individualized Family Service Plan (IFSP).
 - Is the IEP or IFSP current?
 - Document the date the IEP or IFSP was created.
 - Document the date the IEP or IFSP was last updated.
 - Was the IEP or IFSP created before special education and related services were provided?

DIS4.1

Interview: Teacher, Family Child Care Provider and Home Visitor (Staff Coordination)

- ▶ How do coordinators verify with you that individualized plans are working for children with disabilities? How are you supported in implementing plans or addressing any need to change plans?

DIS4.1

Asked By: ECD

- ▶ Describe how you are informed of IEP/IFSP plans for children with disabilities in your learning settings (family child care provider or home visitor). Are you knowledgeable about children's individual objectives, the timelines for addressing the objectives and what supports are provided to meet children's individual needs? Give specific examples.

DIS4.2

Asked By: ECD

- ▶ How do you and your staff promote ongoing communication with families on your program's accomplishments and/or difficulties in addressing a child's individualized service plan (e.g., any special safety, health, and nutrition needs)?

DIS4.2

Asked By: ECD

Observation: Children with Disabilities

- ▶ How are children with disabilities integrated into the classroom, family child care home or socialization learning setting? How are they and their parents encouraged to participate in activities? Document any modifications you observe in the approach, supervision or learning environment that promotes participation by children with disabilities.

DIS4.2

DIS4.3

Observed By: ECD

- ▶ How does the teacher, family child care provider, or home visitor implement the IEP or IFSP in the learning setting? Describe how the plan is utilized in the setting and any visible supports seen for carrying out the plans.

DIS4.2

DIS4.3

Observed By: ECD



Interview: Disabilities Coordinator (Child Assessments)

► Can you describe how children receive the services described in their Individualized Family Service Plan (IFSP) or Individual Education Plan (IEP), both from the Head Start program and from other agencies? How do you support teachers and other staff in providing these services?

DIS4.2

Interview: FCP Staff (Support Services for Families)

► How do you help coordinate strategies from the IEPs and/or IFSPs with Family Partnership agreements? How are you trained/ supported in responding to family questions and concerns about disabilities issues?

DIS4.2

DIS5.1

Interview: Disabilities Coordinator (Adaptation for Children with Disabilities)

► Describe how you have supported teachers in making modifications to their learning environments in order to support the full participation of children with disabilities. Give specific examples.

DIS4.3



Disabilities Services

Disabilities Services Framework #5 - Partnering with Families of Children with Disabilities - Disabilities Services

The program ensures that parents of children with disabilities are supported and involved as decision-makers and receive information and assistance in understanding and advocating for the services needed to address their child’s special needs.

Compliance Indicators:

<p>5.1 The program actively works to inform and support families in developing their knowledge about their child’s disability, their skills in decision-making for their child, and their confidence in accessing resources and advocating to meet the special needs of their child.</p>	<p>1308.21(a)(6), 1308.21(a)(10), 1304.40(a)(3), 1304.40(e)(3)</p>
<p>5.2 The program assists families of children with disabilities to transition from infant and toddler programs to preschool, as well as assisting families of children leaving Head Start for subsequent placements.</p>	<p>1308.21(a)(1), 1308.21(b), 1308.21(c), 1308.4(g), 1304.20(f)(2)(iii)</p>

Targeted Questions for Disabilities Services Framework #5 - Partnering with Families of Children with Disabilities - Disabilities Services

Interview: Parent (Parent Involvement)

► How does the program inform you of your child’s rights to receive disabilities services under IDEA? How does the program support you in your efforts of advocating for your child?

DIS5.1

► How have you been encouraged and supported to learn more about your child’s development and special needs?

DIS5.1

► How has the program help you find information and support on special issues faced by parents of children with disabilities?

DIS5.1

Interview: Disabilities Coordinator (Transitions)

► How does your program ensure that parents are fully informed of their rights under IDEA and are supported in their role as decision-makers for their child? What program activities promote family self-advocacy, both within Head Start and in dealing with other agencies?

DIS5.1



► Describe your transition process and how you assist parents of children with disabilities in transitioning from Head Start to public school or other appropriate placement, including:

- Ensuring that the records of Head Start children with disabilities, including IEPs,, are transferred to the appropriate programs;
- Building parent confidence, skills, and knowledge in accessing resources to meet their child's needs;
- Informing parents of their rights under the Individuals with Disabilities Education Act (IDEA);
- Ensuring a timely transition process; and
- Assisting parents in notifying the school of the child's planned enrollment prior to the date of enrollment.

DIS5.2

Applies To: Programs serving preschool-age children

► What are the program's transition practices for toddlers with disabilities leaving EHS and entering Head Start?

- Describe your process and timeline for transition planning for children on an IFSP.
- How does the program support parents of children with disabilities entering EHS from infant and toddler programs and those leaving EHS for Head Start or other appropriate placement?

DIS5.2

Applies To: Programs serving infants and toddlers

Interview: FCP Staff (Support Services for Families)

► What activities are conducted with families of children with disabilities to support their self-advocacy in the area of disabilities? How do you help inform them about disabilities services and their rights?

DIS5.1

► How do you help coordinate strategies from the IEPs and/or IFSPs with Family Partnership agreements? How are you trained/ supported in responding to family questions and concerns about disabilities issues?

DIS5.1

DIS4.2

Interview: Teacher, Family Child Care Provider and Home Visitor (Support Services for Families)

► What support or direction do you receive on how to work with parents when they raise concerns or questions about the special services their child with a disability is receiving?

DIS5.1

Asked By: ECD

Document Review: Materials for Families

► Describe the materials shared with families to support their development as decision makers and advocates for their children. Look for evidence of:

- Materials from support groups for parents of children with disabilities
- Facilitated referrals to respite care, community parent education and support services
- Sharing information on parent advocacy rights according to IDEA

DIS5.1



Interview: Parent (Transitions)

- ▶ If your child is transitioning from Early Head Start or from Head Start into another program tell me about your own and your child's experiences.
 - Have you gotten to meet the new teacher or tour the new place your child will attend?
 - Were your child's records moved to the next place and did you get a copy?
 - Has the program helped you learn how to be a strong participant in the new program and advocate for your child's progress and success there?

DIS5.2

FCP4.3

Document Review: Transition Plans

- ▶ Review program plans and procedures detailing the process used by staff to assist parents and children with disabilities in transitioning children with disabilities into and out of Early Head Start and Head Start to subsequent placements, including public school. Do plans describe how continuity of disability services is planned and implemented?

DIS5.2

- ▶ Review a sample of transition plans of Head Start Children with disabilities. Verify that transition planning occurred for children with disabilities leaving Head Start for public school, or other placement. How does the program notify the school of planned enrollment?

DIS5.2

Applies To: Programs serving preschool-age children

Child Files: Transitions

- ▶ Review transition plans.
 - Was transition planning undertaken at least 6 months before the child's third birthday?
 - Document the date transition planning began.



Introduction: Mental Health Services

Head Start embraces a vision of mental wellness that includes a collaborative relationship among children, families, staff, mental health professionals, and the community. Head Start's goal in this area is to enhance awareness and understanding of mental wellness and the contribution that mental health information and services can make to the wellness of all children and families. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of the program's approach to working collaboratively with parents, securing the services of mental health professionals, and developing a regular schedule of on-site mental health consultation involving mental health professionals, families, and staff. Their analysis will also include examining the program's policies and procedures designed to provide mental health services.

The **Mental Health Services** section of the Protocol is divided into three (3) Compliance Frameworks:

- Staff Qualifications
- Program Planning and Management
- Parent Involvement in their Child's Mental Health



Mental Health Services

Mental Health Services Framework #1 - Staff Qualifications - Mental Health Services

The grantee ensures effective oversight, coordination, and management of the program’s mental health services by hiring qualified staff and/or consultants and ensuring they have adopted the functions of the area.

Compliance Indicators:	
1.1 The program has hired staff or consultants as content area experts to oversee mental health services who are licensed or certified mental health professionals with experience and expertise in serving young children and their families.	1304.52(d)(4)
1.2 The program ensures that the program management functions for mental health services are formally assigned to and adopted by staff within the program. Note: There is a distinction between the content area expert and the service area manager. One person can fill both of the roles. However, the content area expert must meet all of the qualification requirements as outlined in the performance standards. The Manager or Coordinator does not need to meet these qualifications but must receive expert knowledge and oversight from a Content Area Expert.	1304.52(a)(2)(ii), 1304.52(b)(1)

Targeted Questions for Mental Health Services Framework #1 - Staff Qualifications - Mental Health Services

Interview: Mental Health Content Area Expert (Staff Qualifications and Expertise)

► Are you a licensed or certified mental health professional? If not, does the program have a contract with a licensed or certified mental health professional who supports the provision of mental health services?

MH1.1

► Describe your training or experience related to serving young children and their families.

MH1.1

Staff Files: Mental Health Content Area Expert (Staff Qualifications and Expertise)

► List the mental health content area expert’s training, experience, and qualifications. Document the accrediting body for the license or certification.

MH1.1

Interview: Mental Health Coordinator (Staff Qualifications and Expertise)

► Describe how your knowledge, skills, and experience assist you in performing your assigned functions in the area of mental health services responsibly.

MH1.2

Staff Files: Mental Health Coordinator (Staff Qualifications and Expertise)

► Determine who is formally assigned to the functions of managing mental health services. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

MH1.2



Mental Health Services

Mental Health Services Compliance Framework #2 - Program Planning and Management - Mental Health Services

The program designs and implements practices that identify and are responsive to each child's behavioral and mental health needs, and that educate program staff and families about mental and behavioral health issues.

Compliance Indicators:

2.1 The certified or licensed mental health professional has a schedule of sufficient frequency that enables timely, effective identification of and intervention in family and staff concerns about a child's mental health.	1304.24(a)(2)
2.2 On-site mental health consultation assists the program in providing education to parents and program staff on issues related to child mental health in order to promote children's mental wellness.	1304.24(a)(3)(ii)
2.3 The program designs and implements practices that are individualized to support children's mental and behavioral health needs.	1304.24(a)(3)(i), 1304.24(a)(3)(iii)
2.4 On-site mental health consultation assists program staff and families to access and utilize other community mental health resources, as needed.	1304.24(a)(3)(iv)

Targeted Questions for Mental Health Services Compliance Framework #2 - Program Planning and Management - Mental Health Services

Interview: Disabilities Coordinator (Staff Coordination)

► Describe how coordination with mental health services helped teachers identify mental health problems, such as depression, withdrawal, anxiety, or abuse, for a child with disabilities? Can you give specific examples?

MH2.1

MH2.3

Applies To: Programs serving preschool-age children

Interview: Mental Health Coordinator (Implementing Mental Health Services)

► Describe how you provide or ensure a consultant provides regularly scheduled, ongoing expertise and oversight in the area of mental health services. For example:

- How and how often do you interact with program staff and families on-site?
- How do you assist the program in identifying and addressing behavioral or mental health concerns?
- How is the schedule implemented across all program options? How often do you visit each setting (e.g., home based, classroom, etc.)?

MH2.1

MH2.3



► How do you determine that the schedule of service is frequent enough for the mental health professional to be familiar with the program, staff, and needs of children and families and to provide the consultation and services needed in a timely manner?

MH2.1

MH2.3

► Describe the program's process for identifying staff or family mental health and/or behavior concerns about a child. What do you do to support teachers or home visitors in this process?

MH2.3

► Will you describe how you share examples of working with staff and parents to implement program practices that respond to behavioral and mental health concerns about an individual child or group of children?

MH2.3

► What role do you play in the program's efforts to conduct screening to identify children who might require formal evaluation of behavioral and social-emotional concerns?

MH2.3

► Have you helped design practices responsive to behavioral and mental health concerns about a child or group of children?

MH2.3

Document Review: Contract or Memorandum of Agreement with Mental Health Consultant

► Review the contract or Memorandum of Agreement (MOA) with the mental health consultant to determine the schedule of mental health consultation and services expected. Ensure that the MOA has been signed and dated and provide this information in your notes.

MH2.1

Interview: Mental Health Coordinator (Staff Coordination)

► What types of opportunities do you offer parents and staff to learn about mental health issues and about how to ask for help if they need it?

MH2.2

Interview: Health Coordinator (Screenings)

► Describe how you obtain guidance from the mental health or child development specialist on how to use screening findings.

MH2.3

HEA3.1

Asked By: ISR II

Interview: Teacher, Family Child Care Provider and Home Visitor (Staff Coordination)

► What is the process for communicating your need for support in ensuring that children's health, mental health, and special needs are met? How are your needs for such support met? Do you feel that you receive timely support from your mental health staff? Please give an example.

MH2.3

Asked By: ECD



Interview: Parent (Helping Families Access Health and Dental Care)

► Has the program provided you with a list of mental health resources and/or assisted you in getting mental health services? If yes, please describe the types of resources and assistance you were provided.

MH2.4

Interview: Home Visitor (Parent Involvement)

► How do you make parents and staff aware of available mental health services? What is the referral process?

MH2.4

Asked By: ECD



Mental Health Services

Mental Health Services Compliance Framework #3 - Parent Involvement in their Child’s Mental Health - Mental Health Services

The program collaborates with parents to discuss and identify appropriate responses to each child's behavior including how to strengthen nurturing, supportive environments and relationships, and how to address identified mental or behavioral health concerns.

Compliance Indicators:

3.1 The program communicates with parents to understand their concerns and observations about their child’s behavioral and mental health.	1304.24(a)(1)(i)
3.2 The program discusses with parents staff observations about their individual child, appropriate responses to their child’s behavior, and information about typical behavior and development in children.	1304.24(a)(1)(ii), 1304.24(a)(1)(iii)
3.3 The program discusses with parents how to strengthen nurturing, supportive environments and relationships in the home and at the program.	1304.24(a)(1)(iv)

Targeted Questions for Mental Health Services Compliance Framework #3 - Parent Involvement in their Child’s Mental Health - Mental Health Services

Interview: Parent (Parent Involvement)

► What opportunities do you have to share with staff your observations and concerns about your child's mental health? Please give an example.

MH3.1
1304.24(a)(1)(i)

► How does the program offer guidance to you about your child's behavior? Does the program share positive strategies on how to respond to your child's behavior?

MH3.2

Interview: Teacher, Family Child Care Provider, Mental Health Coordinator and Home Visitor (Parent Involvement)

► How do you actively seek to obtain parents' information, observations, and concerns about their children's mental health?

MH3.1
1304.24(a)(1)(i)

Asked By: ECD and ISR I



Interview: ECD Coordinator and Mental Health Coordinator (Parent Involvement)

► How do you share staff observations with parents and help parents understand child development and their child's behavior?

MH3.2

1304.24(a)(1)(ii)

Asked By: ECD and ISR I

► How do you educate parents about appropriate behaviors and varying individual temperaments? How do you educate parents and staff on appropriate responses to child behaviors? Can you give an example?

MH3.2

1304.24(a)(1)(iii)

Asked By: ECD and ISR I

► How do you help parents understand how to strengthen home environments to support and nurture child development?

MH3.3

Asked By: ECD and ISR I



Introduction: Family and Community Partnerships

The success of Head Start evolves from nurturing strong partnerships with its families and communities. The goal of Head Start in this area is to ensure programs understand what constitutes a positive relationship and partnership. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of how the program is promoting family engagement for all families in a culturally sensitive manner. They should also see evidence of collaboration with community agencies. In addition, reviewers' analysis includes examining the program's policies and procedures designed to facilitate family and community partnerships.

The **Family and Community Partnerships** section of the Protocol is divided into four (4) Compliance Frameworks:

- Staff Qualifications
- Building Relationships and Strengthening Families
- Promoting Parent and Family Engagement
- Building and Maintaining Community Partnerships



Family and Community Partnerships

Family and Community Partnerships Framework #1--Staff Qualifications

The program ensures effective content area expertise, oversight and management of the program’s Family and Community Partnership and Parent Involvement Services, through the hiring of qualified staff and /or consultants and by formally assigning staff and ensuring they have adopted the functions of the area.

Compliance Indicators:

1.1 The program hires staff or consultants as content area experts to oversee family and community partnerships who have training and experience related to social services, human services, or family services?	1304.52(d)(5)
1.2 Parent involvement services are supported by staff or consultants with training, experience, and skills in helping parents advocate and make decisions for their young children and families?	1304.52(d)(6)
1.3 The program ensures that the program management functions for family community partnerships and parent involvement are formally assigned to and adopted by staff within the program. Note: There is a distinction between the content area expert and the service area manager. One person can fill both of the roles. However, the content area expert must meet all of the qualification requirements as outlined in the performance standards. The Manager or Coordinator does not need to meet these qualifications but must receive expert knowledge and oversight from a Content Area Expert.	1304.52(a)(2)(iii), 1304.52(b)(1)

Targeted Questions for Family and Community Partnerships Framework #1--Staff Qualifications

Interview: FCP Content Area Expert (Staff Qualifications and Expertise)

- ▶ Describe your training or experience related to social services, human services, or family services.
FCP1.1
- ▶ What experience do you have in assessing needs, developing goals, making referrals to other agencies, and following up on services (e.g., health, mental health, social services and disabilities) for families?
FCP1.1

Interview: Parent Involvement Content Area Expert and FCP Content Area Expert (Staff Qualifications and Expertise)

- ▶ Describe how you provide the program with regularly scheduled, ongoing expertise and oversight.
FCP1.1
FCP1.2



Interview: FCP Content Area Expert and FCP Coordinator (Staff Qualifications and Expertise)

- ▶ What roles and responsibilities do you have in making referrals to other agencies (e.g., health, mental health, and disabilities) for families?

FCP1.1

Staff Files: FCP Content Area Expert (Staff Qualifications and Expertise)

- ▶ Determine who is hired to be responsible for content area expertise in Family and Community Partnerships. Review the file of that employee or consultant. Document the content area expert's training, experience, and qualifications. The content area expert is the person hired or consulted with that the program determines to meet the criteria of the standard 1304.52(d)(5).

FCP1.1

Interview: Parent Involvement Content Area Expert (Staff Qualifications and Expertise)

- ▶ Describe your training or experience related to parent involvement, social services, human services, or family services.

FCP1.2

Interview: Parent Involvement Content Area Expert and Parent Involvement Coordinator (Staff Qualifications and Expertise)

- ▶ Describe your experience in organizing or facilitating parent education, advocacy, or other groups that support families.

FCP1.2

Staff Files: Parent Involvement Content Area Expert (Staff Qualifications and Expertise)

- ▶ Determine who is hired to be responsible for content area expertise in Parent Involvement. Review the file of that employee or consultant. Document the content area expert's training, experience, and qualifications. The content area expert is the hired staff or consultant who the program determines to meet the criteria of the standard 1304.52(d)(6).

FCP1.2

- ▶ Determine who is formally assigned to the functions of managing parent involvement. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

FCP1.3

Interview: FCP Coordinator and Parent Involvement Coordinator (Staff Qualifications and Expertise)

- ▶ What knowledge, skills, and experience do you have to perform your assigned functions in the area of family and community partnerships responsibly?

FCP1.3

Staff Files: FCP Coordinator (Staff Qualifications and Expertise)

- ▶ Determine who is formally assigned to the functions of managing family and community partnerships. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

FCP1.3



Family and Community Partnerships

Family and Community Partnerships Framework #2--Building Relationships and Strengthening Families

The program builds trusting relationships with parents and family members that provide the basis for a collaborative partnership process aimed at supporting positive child development and strengthening families. This process acknowledges family strengths and offers opportunities for families to identify their own goals, make plans to accomplish them, and access appropriate resources.

Compliance Indicators:

2.1 The program partners with parents to establish a relationship of mutual trust and respect, providing ongoing opportunities for interaction between staff and families throughout the year.	1304.40(a)(4)
2.2 Program staff are familiar with the backgrounds of families and children and communications are respectful of each family’s cultural, ethnic and linguistic diversity, facilitated by bi-lingual staff or interpreter(s) as necessary.	1306.20(f), 1304.40(a)(5)
2.3 A strength-based and family-driven, collaborative partnership-building process is in place that offers all families the opportunity to develop achievable goals, engages them in assessing their needs and strengths, and supports them in taking actions to reach their goals.	1304.40(a)(1), 1304.40(a)(2), 642(b)(7)
2.4 The program provides, directly or through referrals, resources and services responsive to families’ needs, goals and interests and conducts follow up to determine effectiveness of services received.	1304.40(b)(1), 1304.40(b)(1)(i), 1304.40(b)(1)(ii), 1304.40(b)(1)(iii), 1304.40(b)(2)

Targeted Questions for Family and Community Partnerships Framework #2--Building Relationships and Strengthening Families

Interview: FCP Staff (Relationships with Families)

- ▶ Describe the variety of opportunities created by the program which promote communication and interactions between staff and families. Are activities planned at varying times during the day and week (e.g., at breakfast, evenings, weekends) to encourage as many parents as possible to participate.
FCP2.1
- ▶ Describe ways in which activities are individualized to meet the needs of parents or parent groups (i.e., interpretation services, father-focused topics or groups, grandparent-focused topics or groups, individual services that attend to different adult learning styles, attention to adult developmental or learning disabilities, “home visits” with incarcerated parents, etc).
FCP2.1



- ▶ How are meetings and interactions respectful of families' diversity and cultural and ethnic backgrounds, including those of families who might be unable to read or speak English? Can you share materials or plans that show how the program implements this requirement?

FCP2.2

Interview: FCP Staff (Family Partnership Building)

- ▶ How do you identify who should be included in the family partnership process (including guardians, foster parents and grandparents, as applicable)?
- ▶ Describe how your program begins building collaborative relationships of mutual trust and respect with parents and families of enrolled children as early in the year as possible.
- ▶ Describe the process for encouraging families to participate in an individualized process of identifying family strengths, needs and goals that can evolve into Family Partnership Agreements.
 - When and how does this process begin?
 - How do you determine the immediate needs of parents and family members?
 - How do you determine the interests that form the basis for jointly developing short and long term goals with parents (including guardians, foster parents and grandparents, as applicable)?
 - How do you determine which services and supports are appropriate in helping families meet their goals?
 - How do you approach situations in which families are not ready for, or elect not to participate in, the family partnership process?
- ▶ How do you track and assess families' progress in meeting their goals? How do you know when families have met their goals?

FCP2.1

FCP2.1

FCP2.3

FCP2.3

Interview: Parent (Parent Involvement)

- ▶ What parent activities have you participated in during your time in the program? Are the times at which the activities are planned working for you and do you have an opportunity to suggest more convenient times? Does the program plan activities to encourage fathers to participate?
- ▶ How do program staff interact with you during program planned events (e.g., meetings, picnics, religious and Tribal ceremonies, and other events) and are they respectful of your family's culture and ethnic background?
- ▶ Has the program assisted your family in any crisis situation or with any other family need? If you feel comfortable can you describe your experience?

FCP2.1

FCP2.1

FCP2.2

FCP2.4



Document Review: Materials for Families

- ▶ Review newsletters, calendars, parent education planning materials, event flyers, etc., for documentation that activities are planned and that opportunities exist for interaction between staff and families throughout the year. Describe examples of the opportunities documented.
FCP2.1
- ▶ Review materials available for both English and non-English speaking families as appropriate. Into what additional languages have materials been translated? Do these languages reflect languages spoken by the program's families?
FCP2.2

Interview: ECD Content Area Expert (Cultural and Linguistic Responsiveness)

- ▶ Describe how classroom staff and home visitors communicate with families and children who do not speak English. How do you ensure that communication occurs in the preferred language of the family?
FCP2.2
ECD9.1
Asked By: ECD
- ▶ How do you support staff and consultants in understanding diverse cultural and linguistic backgrounds of the children and families?
FCP2.2
ECD9.1
Asked By: ECD

Child Files: Strengthening Families

- ▶ Review family files for Family Partnership Agreements if written, family contact notes, or other documentation. If family goals, timetables and strategies for achieving family goals are documented, do they have a realistic progression, and is there evidence of progress toward meeting these goals?
FCP2.3

Interview: FCP Coordinator (Support Services and Follow up)

- ▶ Give examples of how your program has worked collaboratively with parents to respond to identified family needs, goals, and provided interventions, directly or through referrals, in areas such as: emergency or crisis assistance (such as food, housing, or transportation), counseling or information for mental health issues or substance abuse, spousal or child abuse or neglect, or opportunities for employment and training.
FCP2.4

Interview: FCP Staff (Support Services and Follow up)

- ▶ How do you follow up with families to determine that the services provided through a partner community organization have been responsive to a family's needs?
FCP2.4



Interview: Parent Involvement Coordinator (Support Services and Follow up)

- ▶ How does the program share resources, offer opportunities to participate in parent education, or provide appropriate interventions to families? Describe the types of support services provided (through the program or through referrals) to families in the following areas:
 - Counseling programs,
 - Substance abuse programs,
 - Child abuse and neglect education and referral,
 - Domestic violence services,
 - Prevention programs for at-risk families,
 - Mental health education, and
 - Homelessness support services.

FCP2.4



Family and Community Partnerships

Family and Community Partnerships Framework #3--Promoting Parent and Family Engagement

The program provides opportunities for parents to grow in their knowledge and understanding of the educational, developmental and health needs of their child, expand their parenting and literacy skills and to be actively involved in the child development approach of the program.

Compliance Indicators:

3.1 Program staff plan, and in partnership with parents, schedule and facilitate staff-parent conferences and no less than 2 home visits to discuss each child’s development and progress.	1304.40(e)(5), 1304.21(a)(2)(iii), 1304.40(i)(1), 1304.40(i)(2), 1304.40(i)(3)
3.2 The program provides, either directly or through referrals, opportunities for parents and children to participate in family literacy services.	1304.40(e)(4), 1304.40(e)(4)(i), 1304.40(e)(4)(ii)
3.3 The program provides opportunities for parents to enhance their parenting skills, to become integrally involved in expanding their knowledge and understanding of the education and developmental needs and experiences of their children.	1304.40(e)(3), 1304.40(e)(2), 1304.40(d)(2), 1304.21(a)(2)(ii)
3.4 Parents are given opportunities to participate in health, oral health, nutrition and mental health education activities aimed at increasing their knowledge and understanding of their child’s needs in these areas.	1304.40(f)(1)
3.5 Parents are involved in the development of the program’s child development approach and curriculum.	1304.21(a)(2)(i), 1304.40(e)(1)

Targeted Questions for Family and Community Partnerships Framework #3--Promoting Parent and Family Engagement

Interview: Parent (Parent Involvement)

- ▶ Has your child’s teacher visited you at home this year? When did the teacher visit (how many times) and are the times made convenient? If you don’t want the teacher to visit you at home does the program make other arrangements for you? What benefits do you feel you get from home visits?
FCP3.1
- ▶ When do you get the opportunity to observe your child’s development of new skills and talk to the program about how well your child is progressing?
FCP3.3
- ▶ How often do you receive information about your child’s progress? What types of information is shared and how does the program share it with you (e.g., progress reports, meetings, etc.)?
FCP3.3



- ▶ What types of activities have you suggested for the classroom or for at home if you are in a home-based program? How does the program get you to make suggestions, and do you feel that your suggestions are used?

FCP3.5

Child Files: Parent Involvement

- ▶ Review files to determine whether there is documentation that parent conferences and no less than 2 home visits were scheduled and conducted by teachers with parents of children in each class. If visits or conferences were not scheduled, is there evidence of program attempts to schedule these with parents or have parents explicitly refused?

FCP3.1

- ▶ Review documentation on parent training activities planned and conducted by the program. Were educational information and resources made available and education programs planned and conducted for parents in the areas of:

- Parenting Skills and child development?
- Mental health, nutrition, and oral health?

Make notes of the types of education and training opportunities that were made available to parents.

FCP3.3

FCP3.4

Interview: Teacher, Family Child Care Provider and ECD Coordinator (Parent Involvement)

- ▶ How do you explain the advantages of parent-staff home visits and conferences to parents and encourage them to participate? What happens when parents do not want to participate in the conferences or home visits?

FCP3.1

Applies To: Center-based or family child care programs

Asked By: ECD

- ▶ When are parents allowed to visit the program and observe their children?

FCP3.4

Applies To: Center-based or family child care programs

Asked By: ECD

Interview: Family Child Care Provider, Teacher and ECD Coordinator (Parent Involvement)

- ▶ How often are teachers required to conduct parent conferences and home visits? How many have you conducted this year? How do you schedule them and ensure they occur?

FCP3.1

Applies To: Center-based or family child care programs

Asked By: ECD



Interview: FCP Coordinator (Parent Education)

- ▶ Describe how the program provides, either directly or through referrals, opportunities for parents and children to participate in family literacy services and if so, what is your approach?
FCP3.2
- ▶ How are parents, as adult learners, helped to identify and address their own literacy goals?
FCP3.2
- ▶ Describe how your program provides educational/training opportunities for parents to increase their knowledge and awareness in the areas of:
 - Education and child development,
 - Health, oral health, mental health and nutrition.FCP3.3
FCP3.4

Interview: Parent (Support Services for Families)

- ▶ If you feel comfortable tell me about some of the family literacy services that have been provided to you or others in the program. Family literacy can relate to things like reading with your children, improving your own education learning more about how to support your children's learning , learning to speak and write English or increasing your own reading skills. Does the program offer all of the literacy services to you or do they refer you to other places that are helpful and did these referrals meet your needs?
FCP3.2
- ▶ If you speak another language, how have you been encouraged by the program to share stories in your native language or share your culture in some other way with the children in your child's classroom?
FCP3.3

Interview: Teacher, Family Child Care Provider, ECD Content Area Expert and Home Visitor (Parent Involvement)

- ▶ How are parents provided with opportunities to increase their child observation skills and to share their assessments with staff?
FCP3.3
Asked By: ECD
- ▶ How are parents involved in the selection and or development of the program's curriculum?
FCP3.5
Asked By: ECD
- ▶ Are parents included in educational decisions related to their children? Can you describe the decision-making process?
FCP3.5
Asked By: ECD

Interview: Home Visitor (Parent Involvement)

- ▶ How do you assist, encourage and support parents as they support the growth and development of their children?
FCP3.3
Asked By: ECD



Family and Community Partnerships

Family and Community Partnerships Framework #4--Building and Maintaining Community Partnerships

The program actively engages community agencies in partnering together to provide the highest level of services to Head Start and Early Head Start children and families and leads advocacy efforts for low income young children and families within the community.

Compliance Indicators:

4.1 The program has taken affirmative steps to establish ongoing collaborative partnerships with community providers.	1304.41(a)(1), 1304.41(a)(2), 1304.41(a)(4)
4.2 The program has established and maintained a Health Services Advisory Committees (HSAC).	1304.41(b)
4.3 The program has procedures to support successful transitions for enrolled children and families both into and out of Early Head Start and Head Start programs. Programs must coordinate with other agencies encourage communication with Early Head Start, elementary school principals, and others involved in supporting children and families through transitions, including plans for transition meetings.	1304.41(c)(1), 1304.41(c)(1)(i), 1304.41(c)(1)(ii), 1304.41(c)(1)(iii), 1304.41(c)(1)(iv), 1304.40(h)(1), 1304.40(h)(3), 642A(a)(3), 642A(a)(5), 642A(a)(6), 642A(a)(11), 642A(a)(7)(A)
4.4 The program must initiate transition planning for each Early Head Start enrolled child at least 6 months prior to the child's third birthday to ensure the most appropriate placement into the next preschool setting.	1304.41(c)(2)

Targeted Questions for Family and Community Partnerships Framework #4--Building and Maintaining Community Partnerships

Interview: FCP Coordinator (Community Partnerships)

- ▶ Has the program established ongoing collaborative relationships with health and mental health services providers, such as local health departments, community health centers, managed care organizations, medical or dental schools, and professional associations? Can you describe these partnerships and specify the agencies with which partnerships have been formed.
FCP4.1
- ▶ How do the community partnerships the program has established support families' needs (e.g., improve, share, and augment services for children and families)?
FCP4.1



Document Review: Interagency Agreement

- ▶ Review any community partnership agreements that the program has developed that describe ongoing collaborative relationships with community agencies outlining services and support to Head Start and/or Early Head Start families.

FCP4.1

Interview: FCP Coordinator (Parent Involvement)

- ▶ Has the program established and maintained a Health Services Advisory Committee (HSAC) that includes parents, professionals, and other community volunteers? Who serves on the HSAC? How often does it meet? How does the HSAC help the program stay abreast of current community health needs, community health providers and resources, and make recommendations for necessary interventions for children and families? Describe a recent issue or recommendation that has been discussed by the HSAC.

FCP4.2

Document Review: HSAC Roster and Meeting Minutes

- ▶ Review the HSAC roster and meeting minutes to determine the frequency of meetings, relevancy of topics, and member attendance. Does membership include community members, staff and parents? If no roster or meeting minutes exist, ask a staff member where this information is located.

FCP4.2

Interview: Parent (Transitions)

- ▶ If you are transitioning from Early Head Start or from Head Start into another program tell me about your and your child's experiences.
 - Have you gotten to meet the new teacher or tour the new place your child will attend?
 - Were your child's records moved to the next place and did you get a copy?
 - Has the program helped you learn how to be a strong participant in the new program and advocate for your child's progress and success there?

FCP4.3

DIS5.2

Document Review: Transition Plans

- ▶ Does the program have procedures to support successful transitions for enrolled children and families both into and out of Head Start and Early Head Start that provide coordination with other Head Start agencies, community agencies and/or schools?

FCP4.3

Interview: ECD Content Area Expert (Transitions)

- ▶ Describe how the program establishes communication and develops continuity with the LEA(s) regarding developmentally appropriate curricula, alignment with state early learning standards and the Head Start Outcomes Framework, and shared expectations for children's learning as the children transition to school.

FCP4.3

Asked By: ECD



- ▶ How are children's developmental progress and abilities and other relevant records shared with the school or other program placements (such as Head Start, Child Care and Preschools) as the child transitions? How do you encourage parents, Head Start and/or Early Head Start teachers of next placements to discuss the educational, developmental, and other needs of individual children?

FCP4.3

Asked By: ECD

- ▶ How do you help families understand how parent involvement relates to their child's academic success and teach them strategies for maintaining parent involvement as their child moves from Early Head Start to Head Start or elementary school?

FCP4.3

Asked By: ECD

- ▶ How do you work with parents who speak a language other than English to achieve effective transitions?

FCP4.3

Asked By: ECD

Interview: ECD Coordinator (Transitions)

- ▶ How does the program organize and participate in joint, transition-related training for staff from Head Start, school, community agencies where children are placed?

FCP4.3

Applies To: Programs serving preschool-age children

Asked By: ECD

- ▶ Describe the process and timeline for transition planning for Early Head Start children who will be transitioning out of the program. What is the time frame? What considerations affect this planning?

FCP4.4

Applies To: Programs serving infants and toddlers

Asked By: ECD

Child Files: Transitions

- ▶ Review transition plans.

- Was transition planning undertaken at least 6 months before the child's third birthday?
- Document the date transition planning began.

FCP4.4

DIS5.2



Introduction: Education and Early Childhood Development Services

Head Start is a national leader in Education and Early Childhood Development (ECD). The goal of Head Start in this area is to ensure all children are provided a safe, nurturing, engaging, and secure learning environment in order to promote school readiness. Program services should incorporate all developmental domains (social-emotional, cognitive, language-literacy, physical, creative) in a culturally relevant manner. In order to assess compliance in this area, reviewers should be prepared to conduct a thorough analysis of staff qualifications, training plans, and curriculum planning and implementation. Their analysis will also include examining the program's policies and procedures designed to provide education and early childhood development services.

The **Education and Early Childhood Development** section of the Protocol is divided into nine (9) Compliance Frameworks:

- Oversight and Management
- Staff Qualifications
- Curriculum, Individualization, and Assessment
- Child Outcomes
- Social-Emotional Development
- Cognitive and Language Development
- Physical Development
- Teacher/Child Interactions
- Cultural and Linguistic Responsiveness



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #1 - Oversight and Management

To ensure high quality education and early childhood development services that promote positive outcomes and comprehensive school readiness for all children, the grantee provides effective oversight, management, and support.

Compliance Indicators:

<p>1.1 The program hires staff or consultants as content area experts to oversee education and early childhood development services who have training and experience in theories and principles of child growth and development, early childhood education and family support.</p>	<p>1304.52(d)(1), 648A(a)(3)(A)</p>
<p>1.2 The program ensures that the program management functions for education services are formally assigned to and adopted by staff within the program. Note: There is a distinction between the content area expert and the service area manager. One person can fill both of the roles. However, the content area expert must meet all of the qualification requirements as outlined in the performance standards. The Manager or Coordinator does not need to meet these qualifications but must receive expert knowledge and oversight from a Content Area Expert.</p>	<p>1304.52(a)(2)(ii), 1304.52(b)(1)</p>

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #1 - Oversight and Management

Interview: ECD Content Area Expert (Staff Qualifications and Expertise)

- Describe your training or experience related to child growth and development, early childhood education, and family support.

ECD1.1

Staff Files: ECD Content Area Expert (Staff Qualifications and Expertise)

- Review the degree, training, experience, and qualifications documented for the education and early childhood development staff or consultants who provide content area expertise and oversight on an ongoing or regularly scheduled basis, including documentation of training and experience related to child growth and development, early childhood education, and family support. Indicate which credentials the content area expert possesses.

ECD1.1

If the content area expert does not possess the required degrees, training, experience, and qualifications, document the qualifications that are listed in the file.

Interview: ECD Coordinator (Staff Qualifications and Expertise)

- Describe how your knowledge, skills, and experience assist you in performing your assigned functions responsibly.

ECD1.2



- ▶ Determine who is formally assigned to the functions of managing education services. Indicate whether this is the same person as the content area expert. If there is more than one person, document the training, experience and expertise of the person assigned to manage this area.

ECD1.2



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #2 - Staff Qualifications

To ensure high quality education and early childhood development practices that promote positive outcomes and comprehensive school readiness for all children, the grantee ensures that teachers, family child care providers, and home visitors possess the required qualifications, training, and experience.

Compliance Indicators:

2.1 The program hires teachers who have the required qualifications, training and experience.	648A(a)(3)(A), 1304.52(f), 645A(h)(1)
2.2 The program ensures that family child care providers have the required qualifications, training and experience.	1304.52(h)(1)
2.3 The program ensures that home visitors have the required knowledge and experience in child development and early childhood education; principles of child health, safety, and nutrition; adult learning principles; and family dynamics.	1304.52(e)

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #2 - Staff Qualifications

Staff Files: Infant and Toddler Teacher (Staff Qualifications and Expertise)

- ▶ Review the degree, training, experience, and qualifications documented for center based infant and toddler teachers, including documentation of training and experience related to child growth and development, early childhood education, and family support. Indicate whether the teachers have the required qualifications.
 - Training on effective communication with infants and toddlers and their parents and other staff
 - Training on safety issues (e.g., reducing the risk of Sudden Infant Death Syndrome)
 - CDA for infant and toddler teachers or a State-awarded certificate for infant and toddler teachers that meets or exceeds the requirements for a CDA credential

ECD2.1

Staff Files: Preschool Teacher (Staff Qualifications and Expertise)

- ▶ Review the degree, training, experience, and qualifications documented for center based preschool teachers, including documentation of training and experience related to child growth and development, early childhood education, and family support. Indicate whether the teachers have the required qualifications.

ECD2.1

If the teacher does not possess the required qualifications, document the qualifications that are listed in the file.



Interview: ECD Coordinator (Staff Qualifications and Expertise)

- ▶ Does each FCC provider have a Child Development Specialist assigned to them? How does the Child Development Specialist support the FCC provider in on going monitoring of quality services?

ECD2.2

Staff Files: Family Child Care Provider (Staff Qualifications and Expertise)

- ▶ Review the degree, training, experience, and qualifications documented for the family child care provider. Indicate whether the provider has the required qualifications.

ECD2.2

Staff Files: Home Visitor (Staff Qualifications and Expertise)

- ▶ Review personnel files or resumes of home visitor staff or contract staff and list the degrees, training, experience and qualifications documented. Indicate whether each home visitor serving families have the required training and experience.

ECD2.3



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #3 - Curriculum, Individualization and Assessment

To build a foundation for comprehensive school readiness and to support the overall development of each child, the grantee consistently implements a curriculum that meets all required elements and is linked to ongoing assessment with developmental goals and measurable objectives. For programs serving preschool children, the curriculum and assessment aligns with the Head Start Child Outcome Framework, State early learning standards as appropriate and the requirements and expectations of the schools the children will be attending.

Compliance Indicators:

3.1 The program implements a curriculum based on scientifically valid research and has standardized training procedures and curriculum materials to support implementation.	642(f)(3)(B)
3.2 The program uses information from screenings, ongoing observations, evaluations and insight from parents to determine how to best respond to each child's individual characteristics, strengths and needs.	1304.20(f)(1)
3.3 The program implements a curriculum that promotes children's language and cognitive development, early literacy and math skills, socio-emotional development, physical development and approaches to learning.	1304.21(a)(3), 1304.21(a)(4), 1304.21(a)(5), 642(f)(3)(A)
3.4 The curriculum is linked to ongoing assessment and supports each child's individual pattern of development and learning.	1304.21(c)(2), 642(f)(3)(C)
3.5 The curriculum includes opportunities for children to explore a variety of sensory and motor experiences with support and stimulation from teachers and family members.	1304.21(b)(1)(iii)
3.6 The program integrates all aspects of health, nutrition, and mental health services into the curriculum.	1304.21(c)(1)(iii), 1304.22(d)(2), 1304.23(c)(7)

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #3 - Curriculum, Individualization and Assessment

Document Review: Curriculum

- Write down the name(s) of the curriculum used, the names and/or type(s) of ongoing assessment tools used with the curriculum, and additional supplements used with the curriculum.

ECD3.1



- ▶ Describe how the curriculum is consistent with the following criteria:
 - Includes information describing the research used to validate the curriculum.
 - Includes a description of the curriculum materials that support implementation.
 - Promotes children’s language and cognitive development, early literacy and math skills, socio-emotional development, physical development and approaches to learning.
 - Is linked to ongoing assessment of children’s progress, with developmental and learning goals and measurable objectives.
 - Includes opportunities for children to explore a variety of sensory and motor experiences with support and stimulation from teachers and family members.
 - Promotes the development of program goals for improving school readiness that align with the Head Start Child Outcomes Framework, State early learning standards, as appropriate and the requirements and expectations of the schools the children will be attending.
- ECD3.1
ECD3.3, ECD3.4, ECD3.5, ECD3.6

Interview: ECD Coordinator (Curriculum)

- ▶ Describe how the curriculum in your program has been scientifically researched.
ECD3.1
- ▶ How often is the curriculum assessed to ensure that it continues to be relevant for the children in the program?
ECD3.1
- ▶ How do you determine what training on curriculum and assessment the program should have? Who conducts the training?
ECD3.1
- ▶ Describe how you use the curriculum to promote language and cognitive development, early literacy and math skills, socio-emotional development, physical development and approaches to learning. Show me examples of your documentation that this is occurring consistently across program options and classrooms.
ECD3.3
- ▶ How does your program ensure that children’s progress is assessed and how this information is used to promote development according to each child’s developmental level?
ECD3.4
- ▶ Provide some examples of the opportunities provided for children to explore a variety of sensory and motor experiences. How do staff and family members support these opportunities?
ECD3.5
Applies To: Programs serving infants and toddlers
- ▶ How do you coordinate with other service area staff to ensure they have an opportunity to provide guidance for the integration of health, nutrition, and mental health into curriculum implementation?
ECD3.6
Applies To: Programs serving preschool-age children



Child Files: Assessments

- ▶ Review child assessment records and documentation of individualizing experiences, individualized routines for children in center based and family child care settings, and home visiting goal setting with families, and ongoing planning for home visits. Determine if the information is consistent with the following criteria:
 - Evidence of the use of information from multiple sources to determine the best approach to meeting individualized needs.
 - Assessment records provide information for teachers to plan individualized learning opportunities for each child.
 - Evidence of individualized planning for each child that reflects ongoing assessment records.Documentation may take many forms including reports to parents, daily observations, documentation of experiences etc.
ECD3.2
ECD3.4

Interview: Family Child Care Provider, Home Visitor and Teacher (Individualization)

- ▶ Based on what you know about your children, how do you ensure they are engaged in the experiences that support their continued progress?
ECD3.2
ECD3.4
- ▶ How do you engage parents and families in determining the learning opportunities that will be provided to their children? Provide some examples.
ECD3.2
- ▶ How do you know if your practices for individualizing support children's continued progress?
ECD3.4
- ▶ How do you use routines to support children's development and learning?
ECD3.4

Interview: Family Child Care Provider, Home Visitor and Teacher (Curriculum)

- ▶ Describe how you provide learning opportunities and experiences for children to progress in language and cognitive development, early literacy and math skills, social and emotional development, physical development and approaches to learning.
ECD3.3
- ▶ Tell me about the sensory and motor experiences the children engage in during the day.
ECD3.5
Applies To: Programs serving infants and toddlers
- ▶ How do you integrate health, nutrition, and mental health into children's activities?
ECD3.6
Applies To: Programs serving preschool-age children



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #4 - Child Outcomes

The grantee incorporates child outcome data in the program Self-Assessment and develops improvement plans for school readiness as appropriate.

Compliance Indicators:

4.1 The program identifies goals for improving school readiness aligned with the Head Start Child Outcomes Framework, State Early Learning Standards as appropriate, and requirements and expectations of the schools the children will attend.	641A(g)(2)(A)
4.2 The program uses self assessment information on school readiness goals to develop improvement plans.	641A(g)(2)(B)

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #4 - Child Outcomes

Interview: Family Child Care Provider, Home Visitor and Teacher (Child Outcomes)

- ▶ Tell me about the school readiness goals you have for children. How do you report children’s progress toward meeting the program’s school readiness goals to other program staff and parents?

ECD4.1

Applies To: Programs serving preschool-age children

Interview: ECD Content Area Expert (Child Outcomes)

- ▶ What are your school readiness goals for Head Start children and how are they aligned with the Head Start Child Outcomes Framework, State Early Learning Standards as appropriate, and requirements and expectations of the schools the children will attend.

ECD4.1

Applies To: Programs serving preschool-age children

- ▶ How did you determine those goals?

ECD4.1

Applies To: Programs serving preschool-age children

- ▶ How do you know if children are meeting the school readiness goals?

ECD4.1

Applies To: Programs serving preschool-age children

- ▶ Tell me about the tool(s) your program uses to measure children’s performance as it relates to meeting school readiness goals.

ECD4.1

Applies To: Programs serving preschool-age children



- ▶ Do you aggregate and analyze child assessment information in one or more ways to determine how well-children are performing?
ECD4.1
Applies To: Programs serving preschool-age children
- ▶ Do you generate reports on children’s progress in school readiness? How do you interpret the reports?
ECD4.1
Applies To: Programs serving preschool-age children
- ▶ Does your program develop improvement plans using school readiness information from self assessment?
ECD4.2
Applies To: Programs serving preschool-age children
- ▶ What is the program’s process for understanding reports about children’s progress on school readiness goals?
ECD4.2
Applies To: Programs serving preschool-age children
- ▶ How does your program incorporate reports on children’s school readiness performance into the self assessment?
ECD4.2
Applies To: Programs serving preschool-age children

Document Review: Child Outcomes

- ▶ Review documentation of school readiness goals the program has identified. Do the goals align with the Head Start Child Outcomes Framework, State Early Learning Standards as appropriate, and requirements and expectations of the schools the children will attend?
ECD4.1
Applies To: Programs serving preschool-age children
- ▶ Review the program’s documentation on school readiness for groups of children. Describe any reports the program has that can be used to document school readiness for children.
ECD4.2
Applies To: Programs serving preschool-age children

Pre-Site: Self Assessment and Program Planning

- ▶ Review the program’s documentation related self assessment. Does the program identify goals for school readiness and create improvement plans as a result of internal reporting on children’s progress and outcomes?
ECD4.2
Applies To: Programs serving preschool-age children
Reviewed By: PDM



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #5 - Social-Emotional Development

To lay a foundation for social competence and early learning, the grantee promotes the social and emotional development of children.

Compliance Indicators:

5.1 The program encourages trust and emotional security.	1304.21(a)(3)(i)(A), 1304.21(b)(1)(ii)
5.2 The program fosters independence.	1304.21(a)(3)(i)(B), 1304.21(a)(1)(v)
5.3 The program encourages the development of self-awareness, autonomy, and self expression.	1304.21(b)(2)(i)
5.4 The program enhances each child’s strengths by encouraging self-control through setting clear, consistent limits and having realistic expectations.	1304.21(a)(3)(i)(C)
5.5 The program encourages respect for others’ feelings and rights.	1304.21(a)(3)(i)(D)
5.6 The program plans for routines and transitions so they occur in a timely, predictable, and unrushed manner according to each child's needs.	1304.21(a)(3)(ii)
5.7 The program supports the emerging communication skills of infants and toddlers by providing daily opportunities for each child to interact with others and to express himself or herself freely.	1304.21(b)(2)(ii)
5.8 The program develops secure relationships in out-of-home care settings for infants and toddlers by having a limited number of consistent teachers over an extended period of time.	1304.21(b)(1)(i)



Targeted Questions for Education and Early Childhood Development Services Compliance Framework #5 - Social-Emotional Development

Observation: Building Trust

- ▶ Describe your observations of how the program builds trust and emotional security. Look for evidence of a warm and supportive classroom. Describe how the adults and children interact with each other. Focus specifically on the relationships that are supportive and caring.

Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.

- Adults listening and responding to the verbal and non-verbal cues of individual children.
- Adults consistently and promptly responding to children.
- Adults holding children making eye contact and communicating with them.
- Adults speaking in calm voices.

ECD5.1

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

Observation: Fostering Independence

- ▶ Describe your observations of how the program fosters independence in daily routines, interactions and experiences.

Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.

- The environment encourages active exploration according to each child's developmental level.
- Adults observing children, showing an interest in what they are doing and providing positive feedback and support to children.
- Adults providing children with opportunities to do things for themselves, particularly in the areas of eating, toileting, dressing and other personal care routines.
- Adults providing children with choices, providing supportive assistance if needed.

ECD5.2

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

Interview: Home Visitor, Family Child Care Provider and Teacher (Fostering Independence)

- ▶ What are some of the strategies you use and encourage parents to use to foster independence?

ECD5.2

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

- ▶ How do you support each child's individual needs around diapering, and transitioning to independent use of toilet facilities?

ECD5.2

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers



Observation: Self-Awareness

- ▶ Describe your observations of how the program promotes and supports the development of self awareness, autonomy and self expression. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Culturally relevant and appropriate materials that are accessible to children and supportive of self awareness (such as mirrors, materials from home, pictures of families, books that reflect their experiences etc)
 - The location of materials in the classroom and whether they encourage the development of self-awareness, autonomy, and self-expression
 - Adults recognizing and affirming each child's individual interests, preferences and temperaments.
 - Adults responding to each child's sense of pleasure and accomplishment.
 - Adults providing age and developmentally appropriate opportunities and guidance for children to make decisions about their daily routines, who they will play with, and when and under what circumstances they will seek adult help.
 - Adults providing age and developmentally appropriate opportunities for children to observe and explore similarities and differences among themselves.

ECD5.3

Applies To: Programs serving infants and toddlers

Observation: Encouraging Self-Control

- ▶ Describe your observations of how the program encourages self control. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Adults guiding behavior and setting clear limits with realistic expectations based on the children's ages and ability
 - Adults helping children understand and communicate their feelings
 - Adults anticipating problems to conduct effective classroom management that prevents escalation of uncontrolled conflict

ECD5.4

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers



Interview: Home Visitor, Family Child Care Provider and Teacher (Encouraging Self-Control)

- ▶ Please provide examples of how you set consistent limits for children and your developmental expectations for adhering to those limits.
ECD5.4
Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers
- ▶ How do you consider individual children's temperaments and development needs when setting consistent limits?
ECD5.4
Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers
- ▶ How do you ensure that you are determining appropriate developmental expectations for children?
ECD5.4
Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers
- ▶ How do you convey to children what your expectations of them are?
ECD5.4
Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

Observation: Encouraging Respect

- ▶ Describe your observations of how the program encourages children to respect the feelings and rights of others.
Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Adults engaging children in problem-solving strategies with positive guidance and support
 - Adults modeling ways to play together cooperatively
 - Adults modeling the use of respectful language
 - Adults providing positive feedback and information regarding the feelings and rights of others.
 - Adults encouraging age appropriate understanding of the feelings and rights of others.**ECD5.5**
Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

Interview: Home Visitor, Family Child Care Provider and Teacher (Encouraging Respect)

- ▶ What do you do to encourage children to respect the rights and feelings of others?
ECD5.5
Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers



Observation: Daily Routines and Transitions

- ▶ Describe your observations of how the program uses routines and transitions in an effective manner to encourage positive social interactions and emotional self regulation. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Predictable, daily routines that are responsive to the changing needs and interests of children. For example, the children nap, eat and have their diapers changed according to their individual needs.
 - Adults providing children with enough time to complete a transition activity or self-help task.
 - Children engaging in routines and transitions that do not require them to be inactive for inappropriate lengths of time.

ECD5.6

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers



Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations

- ▶ How do staff ensure that infants are held while being fed rather than being laid down to sleep with a bottle? Document your observations.

ECD5.6

NUT4.4

Applies To: Programs serving infants and toddlers

Observed By: ISR II

Observation: Health and Safety of Infants and Toddlers

- ▶ Are infants held during bottle feeding? If not, describe.

ECD5.6

Applies To: Programs serving infants and toddlers

Observation: Cognitive Development

- ▶ Describe your observations of how the program supports the communication skills of infants and toddlers to promote social and emotional development. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.

- Adults engaging children in conversations.
- Adults talking to children during classroom routines, using descriptive language.
- Adults encouraging children to interact during routines such as meal times.
- Adults helping children understand each other.
- Adults building on children's verbal and non verbal communication by expanding on their vocalizations or gestures.

ECD5.7

Applies To: Programs serving infants and toddlers

Interview: ECD Coordinator (Transitions)

- ▶ Have staff changes occurred? How many changes have occurred during this program year?

ECD5.8

Applies To: Programs serving infants and toddlers

- ▶ How long has each infant and toddler teacher been with the same group of children?

ECD5.8

Applies To: Programs serving infants and toddlers

- ▶ How do you provide for continuity of care?

ECD5.8

Applies To: Programs serving infants and toddlers



- ▶ What is the procedure for assigning substitutes? Who are they? How do you make sure they are still providing continuity of care?

ECD5.8

Applies To: Programs serving infants and toddlers

Interview: Teacher (Transitions)

- ▶ Describe the process for moving children to new groups, including temporary moves, transition points based on age, and other transitions.

ECD5.8

Applies To: Programs serving infants and toddlers

- ▶ Are children oriented gradually to new groups or teachers with a familiar adult present?

ECD5.8

Applies To: Programs serving infants and toddlers

- ▶ How do you maintain secure and consistent relationships with infants and toddlers and their families?

ECD5.8

Applies To: Programs serving infants and toddlers

Interview: Family Child Care Provider and Home Visitor (Transitions)

- ▶ How do you maintain secure and consistent relationships with infants and toddlers and their families?

ECD5.8

Applies To: Programs serving infants and toddlers

Interview: Home Visitor (Transitions)

- ▶ Describe how your program provides for home visits to occur if you are ill or on vacation.

ECD5.8

Applies To: Programs serving infants and toddlers

Interview: Family Child Care Provider (Transitions)

- ▶ Describe the provisions that are made for the children's care if you are ill or on vacation.

ECD5.8

Applies To: Programs serving infants and toddlers



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #6 - Cognitive and Language Development

To build a foundation for comprehensive school readiness, the grantee promotes the development of each child’s cognitive and language skills.

Compliance Indicators:	
6.1 The program utilizes various strategies including experimentation, inquiry, observation, play and exploration.	1304.21(a)(4)(i)
6.2 The program provides opportunities for self expression through art, music, and movement.	1304.21(a)(4)(ii)
6.3 The program promotes interaction and language use among children and between children and adults.	1304.21(a)(4)(iii)
6.4 The program promotes the literacy and early math development through materials and experiences according to each child’s developmental level.	1304.21(a)(4)(iv)
6.5 The program provides opportunities for children to engage in child-initiated and adult-directed activities	1304.21(a)(1)(iv)

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #6 - Cognitive and Language Development

Observation: Cognitive Development

- ▶ Describe your observations of how the program supports children’s cognitive development through a variety of strategies.
Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Children engaging in science, math, and literacy experiences
 - Adults providing opportunities and guidance for children to play and explore
 - Children engaging independently and with assistance as needed in play and exploration
 - Adults supporting children with guidance and materials to support their discovery of new things.

ECD6.1

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers



Interview: Family Child Care Provider, Home Visitor and Teacher (Cognitive Development)

- What strategies do you use to encourage experimentation, inquiry, observation, play and exploration?

ECD6.1

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

Observation: Art, Music, and Movement

- Describe your observations of how the program provides opportunities for children to express themselves through art, music, and movement experiences. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
- Children using independently and with assistance as needed, a variety of age appropriate art materials and tools
 - Children engaging in creative, open ended art experiences
 - Children engaging in a variety of opportunities to experience music
 - Adults encouraging children to listen to different types of music
 - Adults singing with one or more children
 - Adults facilitating a variety of responses to music, such as clapping, dancing, marching and singing along

ECD6.2

Interview: Family Child Care Provider, Home Visitor and Teacher (Art, Music, and Movement)

- How do you engage children in creative expression through art, music, and movement activities?

ECD6.2

Observation: Language Development

- Describe your observations of how the program provides opportunities for children to hear and use language for a variety of purposes. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
- Adults listening actively to children
 - Adults engaging children in conversations both individually and in small groups
 - Adults facilitating conversations among children.
 - Adults asking children relevant questions and allowing them time to respond
 - Adults actively supporting the development of self expression through language, by balancing listening and responding.
 - Adults providing children with feedback in terms of prompts, the introduction of new vocabulary and extension of ideas and thoughts.

ECD6.3

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers



Interview: Family Child Care Provider, Home Visitor and Teacher (Language Development)

- What strategies do you use to promote language development for a variety of purposes?

ECD6.3

Applies To: Family child care and home-based programs serving children of all ages and center-based programs serving infants and toddlers

Observation: Early Math Development

- Describe your observations of how the program provides opportunities for children to progress in developing age appropriate understanding of early literacy and early math concepts. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.

Literacy

- Adults providing children with high quality children’s literature and encourage their participation in exploring the books on their own, with other children and with adults.
- Adults assisting children in understanding the multiple purposes of books and print
- Adults regularly reading to children individually and in small groups and engaging them in understanding the stories through a variety of interactive exchanges
- Children using age and developmentally appropriate writing materials such as markers, crayons, paint, and pencils
- Children engaging in experiences that allows them to explore print, and interact with letters and numbers
- Materials that promote increasing understanding of print concepts and letter recognition
- Use of environmental print, displays of children’s names, and literacy related materials
- Adults promoting literacy development through daily routines

Math

- Adults increasing children’s understanding of math concepts, numbers, counting and problem solving throughout daily routines.
- Children using materials and engaging in experiences that encourage sorting, matching, identification of patterns, measuring, grouping, sequencing, one-to-one correspondence, and the use of math concepts for a variety of purposes

ECD6.4

Interview: Family Child Care Provider, Home Visitor and Teacher (Early Math Development)

- What strategies and materials do you use to support literacy and math development?

ECD6.4

Observation: Child and Teacher Directed Activities

- Describe your observations of how the program provides opportunities for children to use and hear language. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.

- Regular routines for children to engage in child initiated activities such as free choice time, and leading adults and peers in play.
- Adults supporting children’s exploration and experiences with interest and guidance
- Adults appropriately directing activities according to the developmental readiness of each child attending to their interest and attention span

ECD6.5



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #7 - Physical Development

To build foundations for comprehensive school readiness the grantee promotes the physical development of each child.

Compliance Indicators:

7.1 The program provides sufficient indoor and outdoor space, equipment, materials, and adult guidance for active play and movement to promote the development of gross motor skills.	1304.21(a)(5)(i), 1304.21(b)(3)(i)
7.2 The program provides appropriate time, space, equipment, materials, and adult guidance for developing fine motor skills according to each child's developmental level.	1304.21(a)(5)(ii), 1304.21(b)(1)(iii)
7.3 Programs encourage parents to appreciate the importance of physical development, provide opportunities for children's outdoor and indoor active play, and guide children in safe use of equipment and materials.	1304.21(a)(6), 1304.21(b)(3)(i), 1304.21(b)(3)(ii)

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #7 - Physical Development

Observation: Gross Motor Skills

- ▶ Describe your observations of how the program provides opportunities for children to develop gross motor skills.
Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Adults interacting with children to guide and assist them in the safe use of equipment and space.
 - Children participating in experiences and using materials and equipment that supports the development of their gross motor skills, such as grasping, pulling, pushing, crawling, walking and climbing.
 - Children are engaged in activities and experiences that promote their gross motor skills.
 - Adults provide opportunities both indoors and outdoors with appropriate equipment for children to engage in active play.

ECD7.1

Interview: Family Child Care Provider and Teacher (Gross Motor Skills)

- ▶ How do you promote developmentally appropriate gross motor skills indoors and outdoors?

ECD7.1



Observation: Fine Motor Skills

- ▶ Describe your observations of how the program provides opportunities for children to develop fine motor skills. Use the following examples to guide your observation and indicate whether the experiences the children engage in are appropriate for their age and developmental level.
 - Adults guiding children's use of materials that promote the development of fine motor skills.
 - Children participating in experiences that develop control and coordination of small specialized motions of eyes, mouth, hands, and feet.
- ▶ Children are engaged in activities and experiences that promote their fine motor skills such as art, sand and water play, block building, shape sorting, feeding, solving puzzles, exploring textures, stringing beads and using writing materials.

ECD7.2

Interview: Family Child Care Provider and Teacher (Fine Motor Skills)

- ▶ How do you promote developmentally appropriate fine motor skills?

ECD7.2

Interview: Home Visitor (Physical Development)

- ▶ Provide examples of how you work with families to:
 - To help them understand the importance of physical development;
 - Provide opportunities for active play with their children; and
 - Guide children in safe use of equipment and materials.

ECD7.3



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #8 - Teacher/Child Interactions

To promote positive child development linked to later school achievement, teachers engage in effective teacher-child interactions across multiple dimensions of quality.

Compliance Indicators:

8.1 Emotional Support™

8.2 Classroom Organization™

8.3 Instructional Support™

Classroom Assessment Scoring System™, Pianta et al. © 2008 Brookes Publishing Co.

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #8 - Teacher/Child Interactions

Observation: CLASS™ Observation

► Positive Climate (PC)

- Relationships
- Positive Affect
- Positive Communication
- Respect

ECD8.1

Observed By: CLASS™ Reviewer

► Negative Climate (NC)

- Negative Affect
- Punitive Control
- Sarcasm/Disrespect
- Severe Negativity

ECD8.1

Observed By: CLASS™ Reviewer

► Teacher Sensitivity (TS)

- Awareness
- Responsiveness
- Addresses Problems
- Student Comfort

ECD8.1

Observed By: CLASS™ Reviewer



- ▶ **Regard for Student Perspectives (RSP)**
 - Flexibility and Student Focus
 - Support for Autonomy and Leadership
 - Student Expression
 - Restriction of Movement

ECD8.1

Observed By: CLASS™ Reviewer

- ▶ **Behavior Management (BM)**
 - Clear Behavior Expectations
 - Proactive
 - Redirection of Misbehavior
 - Student Behavior

ECD8.2

Observed By: CLASS™ Reviewer

- ▶ **Productivity (PD)**
 - Maximizing Learning Time
 - Routines
 - Transitions
 - Preparation

ECD8.2

Observed By: CLASS™ Reviewer

- ▶ **Instructional Learning Formats (ILF)**
 - Effective Facilitation
 - Variety of Modalities and Materials
 - Student Interest
 - Clarity of Learning Objectives

ECD8.2

Observed By: CLASS™ Reviewer

- ▶ **Concept Development (CD)**
 - Analysis and Reasoning
 - Creating
 - Integration
 - Connections to the Real World

ECD8.3

Observed By: CLASS™ Reviewer



- ▶ Quality of Feedback (QF)
 - Scaffolding
 - Feedback Loops
 - Prompting Thought Processes
 - Providing Information
 - Encouragement and Affirmation

ECD8.3

Observed By: CLASS™ Reviewer

- ▶ Language Modeling (LM)
 - Frequent Conversation
 - Open-Ended Questions
 - Repetition and Extension
 - Self- and Parallel Talk
 - Advanced Language

ECD8.3

Observed By: CLASS™ Reviewer



Education and Early Childhood Development Services

Education and Early Childhood Development Services Compliance Framework #9 - Cultural and Linguistic Responsiveness

To build a foundation for comprehensive school readiness and to support the overall development of children who are dual-language learners the grantee provides the full spectrum of comprehensive Head Start services through a culturally and linguistically responsive approach.

Compliance Indicators:

9.1 Staff and program consultants are familiar with the ethnic background and heritage of families in the program and communicate with parents in their primary or preferred language or through an interpreter to the extent possible.	1304.51(c)(2), 1304.52(b)(4), 1304.40(a)(5), 1306.20(f)
9.2 The program’s approach to child development and education promotes an environment of acceptance that supports and respects gender, culture, language, ethnicity, and family composition.	1304.21(a)(1)(iii)
9.3 When a majority of children speak the same language, at least one classroom staff member or home visitor interacting regularly with the children speaks their language.	1304.52(g)(2)
9.4 The program demonstrates that children who are dual-language learners develop and demonstrate meaningful progress toward school readiness based on the Head Start Child Outcomes Framework through the use of culturally and linguistically appropriate instructional services.	641A(a)(1)(B)(i), 641A(a)(1)(B)(ii), 641A(a)(1)(B)(iii), 641A(a)(1)(B)(iv), 641A(a)(1)(B)(v), 641A(a)(1)(B)(vi), 641A(a)(1)(B)(vii), 641A(a)(1)(B)(viii), 641A(a)(1)(B)(ix)
9.5 The program demonstrates that children who are dual-language learners develop and demonstrate progress toward the acquisition of the English language.	641A(a)(1)(B)(x)

Targeted Questions for Education and Early Childhood Development Services Compliance Framework #9 - Cultural and Linguistic Responsiveness

Interview: ECD Content Area Expert (Cultural and Linguistic Responsiveness)

- Tell me about the cultural and linguistic backgrounds of the individual children and families enrolled in your program.

ECD9.1



- ▶ Describe how classroom staff and home visitors communicate with families and children who do not speak English. How do you ensure that communication occurs in the preferred language of the family?
ECD9.1
FCP2.2
- ▶ How do you support staff and consultants in understanding diverse cultural and linguistic backgrounds of the children and families?
ECD9.1
FCP2.2
- ▶ Describe the strategies your program uses to ensure that all children and families of different ethnic backgrounds, cultures and languages are accepted and supported in your program.
ECD9.2
- ▶ How do you ensure that at least one classroom staff member or home visitor speaks the language of the majority of children they serve?
ECD9.3
- ▶ Describe how classroom staff and home visitors support the development of a child's home language.
ECD9.3
- ▶ Describe how the program provides linguistically and culturally appropriate practices (i.e., learning opportunities, experiences, etc.). How do these practices support the comprehensive development of children who are dual-language learners?
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ How do you ensure that screening and assessment instruments are culturally and linguistically appropriate and administered correctly? Have you made any modifications to the instruments? Explain.
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ How do you ensure that teaching and home visiting staff understand the multiple ways children can demonstrate their knowledge and capabilities, regardless of the language they speak?
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ Describe your program's approach for encouraging the progression toward the acquisition of English while supporting the first language of children who are dual-language learners.
ECD9.5

Interview: Family Child Care Provider, Home Visitor and Teacher (Cultural and Linguistic Responsiveness)

- ▶ Tell me about the cultural and linguistic backgrounds of the individual children you work with. How do you know this information?
ECD9.1
- ▶ Describe how you increase your knowledge and understanding of the different languages and cultures of the children you work with?
ECD9.1
- ▶ Do you serve any children and families who do not speak English? How do you communicate with them? Do you know what their preferred language is? How do you know this information?
ECD9.1



- ▶ How do you determine the type of learning opportunities and experiences to provide for children who are dual-language learners?
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ Provide some examples of how you encourage the participation of children who are dual-language learners in daily routines and learning experiences.
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ Provide some examples of what you look for as you observe children who are dual-language learners. How do they show you what they know and can do?
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ Provide some examples of how you interact with children who are dual-language learners to encourage their development across all learning domains.
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ Provide some examples of strategies you use to encourage the progression toward the acquisition of English.
ECD9.5

Observation: Cultural and Linguistic Responsiveness

- ▶ Describe how the program supports and respects gender, culture, language ethnicity and family composition. Use the following examples to guide your observation.
 - Adults modeling respect for the children and each other
 - Learning environments that are void of activities and materials that stereotype or limit children according to their gender, age, disability, race ethnicity, or family composition.
 - Learning environments that reflect the cultures and languages of the particular children and families in an integrated and natural manner.**ECD9.2**
- ▶ Describe the communication between the adults and children who are dual-language learners. Note specifically whether at least one adult is able to communicate with the child in his or her home language. If you have observed that in at least one setting no adult was able to communicate with a child in his or her home language, conduct a follow-up interview with the ECD Coordinator to understand how adults communicate with children and their families in this setting.
ECD9.3
- ▶ Describe how adults actively interact with children who are dual-language learners through a variety of strategies that include both verbal prompts and instruction and non-verbal demonstrations and encouragement.
ECD9.4
Applies To: Programs serving preschool-age children
- ▶ Describe how staff interact with children intentionally promoting language development.
ECD9.5



Document Review: Curriculum

- ▶ Review the program's curriculum. Describe how the curriculum provides information on how to support, respect and respond to the gender, culture, language, ethnicity and family composition of children (e.g., first and second language development).

ECD9.2

Child Files: Cultural and Linguistic Responsiveness

- ▶ Review child assessment information to determine whether progress across all developmental domains for children who are dual-language learners has been documented. Note the language or languages of the assessment information.

ECD9.4

- ▶ Review plans for individualizing to determine if appropriate learning opportunities and experiences for children who are dual-language learners are being planned.

ECD9.4



Introduction: Fiscal Management

Head Start's goal in this area is for programs to have systems in place that provide for effective control over and accountability for grant funds, property, and other assets. In order to assess compliance in this area, reviewers should be prepared to conduct a comprehensive analysis of the program's systems for budget development and monitoring, financial reporting, processing of funds from the Payment Management Systems, ensuring insurance coverage, timekeeping, salary and compensation, and communicating with governing bodies. Their analysis will also include reviewing documentation of non-Federal match and examining the pre-site documents from the Regional Office, in addition to an emphasis on transaction analysis and an enhanced review of facilities, purchases, construction, and major renovation.

The **Fiscal Management** section of the Protocol is divided into six (6) subsections with Compliance Indicators for each subsection:

- Financial Management Systems
- Reporting
- Procurement
- Compensation
- Cost Principles
- Facilities and Property



Fiscal Management

Fiscal Management Compliance Indicator 1A

Do the program's financial management systems provide for effective control over and accountability for grant funds, property, and other assets and ensure they are used solely for authorized purposes?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;

45 CFR Part 92 for State, local, and Tribal governments.

This question relates to the "control activities" aspect of internal controls. Control activities are the policies, procedures, techniques, and mechanisms that enforce management directives, such as the process of adhering to requirements for budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, reviewing, and accountability for stewardship of government resources and achieving effective results.

74.21(b)(3), 92.20(b)(3),
74.21(b)(4), 92.20(b)(4),
1301.32(b), 230, App B(8)(j)

Targeted Questions for Fiscal Management Compliance Indicator 1A

Observation: Fiscal Observations

- ▶ In conducting the onsite portion of the review, were problems noted in physical control, such as open access to check stock or purchase orders, cash not under lock and key, or open access to mechanical check signers or signature stamps?

Transaction: Journal Entries (General Ledger)

- ▶ Was the journal entry supported by appropriate documentation and approved by a person other than the preparer? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Do the grantee's fiscal records differentiate development and administrative costs from program costs to insure that development and administrative costs do not exceed 15 percent of the total grant (unless a waiver granting a higher percentage has been received)?

Document Review: Bank Reconciliations & General Ledger

- ▶ Review two consecutive bank statements.
 - Are bank statements reconciled to the general ledger?
 - Are reconciling items (including outstanding checks) resolved within a reasonable time frame?
 - Do checks clear the bank within a reasonable amount of time after the issue date?
 - Are the signatures on cancelled checks those of individuals who the Board has authorized as signers?

Document Review: Salaries, Payroll & Other Compensation

- ▶ Does the organization have an incentive compensation (bonus) plan which governs the payment of bonuses and is it consistently followed?

Document Review: Aged Payables

- ▶ Review a report or listing of aged payables. Are bills and invoices paid on time (not more than 30 days past due unless disputed)?



Interview: Fiscal Officer (Aged Payables)

- ▶ How does the program ensure that bills and invoices are paid on-time?

Transaction: Facilities (Construction of Facilities)

- ▶ For construction of facilities, does the grantees financial reporting separately identify expenses for one-time funds awarded for construction, purchase, or major renovation?

Transaction: Facilities (Purchased Facilities)

- ▶ For a purchased facility, does the grantees financial reporting separately identify expenses for one-time funds awarded for construction, purchase, or major renovation?

Transaction: Facilities (Major Renovations of Facilities)

- ▶ For major renovations to property, does the grantees financial reporting separately identify expenses for one-time funds awarded for construction, purchase, or major renovation?

Interview: Fiscal Officer (Control Activities)

- ▶ What are the procedures for using automated check signers and signature plates?
- ▶ Does the program perform periodic cost projections to ensure that funds will be adequate to carry out the Head Start/Early Head Start program, as described in the approved funding application?
- ▶ If you have a small number of fiscal staff, how do you compensate for the program's inability to segregate duties?

Interview: Fiscal Officer (Compensation)

- ▶ Explain any compensation or bonus agreements/plans in effect in your program. These may apply to management or employees.
- ▶ What method does the program use to ensure that funds are available for payment of any vested accrued leave owed to employees of the grantee? Can you show me any fiscal manuals or other applicable written procedures, trust agreements, bank or trust account statements and SF-269 that document this method?



Fiscal Management

Fiscal Management Compliance Indicator 1B

APPLIES ONLY TO: Grantees

Has the grantee made changes to the budget that required prior approval before receiving such approval in writing?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;

45 CFR Part 92 for State, local, and Tribal governments.

All changes requiring prior approval must be submitted in writing to the Regional Grants Officer. If the change involves a budget revision, the grantee must identify the changes on an SF-424 and an SF-424A. As provided in 45 CFR 74.25(K) and 45 CFR 92.30(A)(1), Regional Office approval of changes must be in writing and signed by either the Grants Management Officer.

74.25, 92.30

Targeted Question for Fiscal Management Compliance Indicator 1B

Document Review: Financial Assistance Award (FAA)

- ▶ Were supplemental or one-time funds (e.g., program improvement) awarded by ACF for specific purposes subject to restrictive language in the FAA?
- ▶ Were the restricted supplemental or one-time funds used by the grantee solely for the purpose indicated in the grant award?
- ▶ Did the grantee receive Regional Office permission to use the funds for a purpose other than the purpose indicated in the grant award?

Document Review: Regional Office Correspondence

- ▶ Identify all equipment purchases made with Head Start funds with a unit cost in excess of \$25,000. Does evidence exist of Regional Office approval on the FAA or through written Regional Office correspondence?

Document Review: Grant Application Budget Instrument (GABI)

- ▶ Review the grant application for the current award period, the organizational chart and relevant RO correspondence. For key personnel, did the Regional Office approve the hiring? Are any key personnel different than those reflected on the grant application? If so, was Regional Office approval obtained for individuals hired in these key positions?

PDM10.2

Document Review: Bank Reconciliations & General Ledger

- ▶ A concern was identified related to the use of one-time funds. Review the general ledger to determine whether the financial records establish that one-time funds were expended for purposes listed in the FAA.

Interview: Fiscal Officer (Inventory and Equipment Records)

- ▶ How do you ensure that written approval is obtained before using Head Start funds to purchase equipment costing more than \$25,000 not provided in the approved budget?



Fiscal Management

Fiscal Management Compliance Indicator 1C

Does the program minimize the time elapsing between the advances of funds from the Payment Management System and disbursement of those funds? Has the program avoided drawing down Head Start funds in excess of documented cash requirements?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;

45 CFR Part 92 for State, local, and Tribal governments.

For nonprofit organizations, procedures must be written. For State, local and Tribal government entities, procedures need not be written.

74.22(b)(2), 92.20(b)(7)

Targeted Question for Fiscal Management Compliance Indicator 1C

Pre-Site: SF-425

- ▶ Do any of the SF-425 reports reflect significant Federal cash balance?

Document Review: Bank Reconciliations & General Ledger

- ▶ From a recent SF-425 report, select a sample of draw-downs (focusing on transaction samples at the beginning and end of the funding period) and verify that the grantee has appropriate documentation to support the requested amount. Based on the sample, does the grantee minimize the time elapsing between receipt of funds and disbursement so that cash advances are as close as administratively feasible to the actual disbursement?

Interview: Fiscal Officer (Financial Reports/Accounting Systems)

- ▶ Your review of SF-425 reports indicated a significant Federal cash balance. Ask the fiscal officer: Can you explain the significant cash balance?
- ▶ Concerns were identified regarding time elapsing between receipt of funds and disbursement. Can you provide an explanation as to why disbursements were delayed?



Fiscal Management

Fiscal Management Compliance Indicator 1D

Have Head Start funds been used by the grantee to pay the cost of expenses which should have been paid using another funding source (directly or by allocation) or allowed another program to use Head Start funds in the nature of a temporary loan to cover another program’s costs or expenses?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App A(A)(2)(a), 225, App A(C)(1)(a), 225, App A(C)(1)(d), 220, App A(C)(2)

Targeted Question for Fiscal Management Compliance Indicator 1D

Document Review: Bank Reconciliations & General Ledger

- ▶ Review accounts receivable for the Head Start program(s). Are funds due from any other funding sources within the grantee organization?
- ▶ Scan the general ledger, payroll journal, and adjusting journal entries. Is there an indication the award has been charged for costs unrelated to Head Start?
- ▶ The fiscal officer has indicated that the organization has one or more programs operating at a deficit, has lost a program or is awaiting reimbursement in other programs. Review the program’s general ledger and deposit account statements for the past two months to identify any transfer of funds to other programs or transfers of funds which are unrelated to program operations (focus on any transfers >25,000). Describe any transfers of funds between the Head Start program and other programs.

Interview: Fiscal Officer (Inter-fund Borrowing)

- ▶ Does the organization have one or more of the following: programs operating at a deficit, loss of programs, or delayed reimbursement in other programs?
- ▶ If yes, describe the circumstances of the programs operating at a deficit, loss of programs, or delayed reimbursement in other programs.
- ▶ Transfers of funds between the Head Start program and other programs were identified. Follow up with the fiscal officer: Can you explain any transfers of funds between the Head Start program and other programs?



Fiscal Management

Fiscal Management Compliance Indicator 1E

Do the program and any delegate agencies obtain, manage, and maintain appropriate insurance coverage for risks and liabilities and use insurance to manage risks?

1309.11 Applies only to private nonprofit organizations.
 2 CFR Part 230 for nonprofit organizations;
 2 CFR Part 225 for State, local, and Tribal governments;
 2 CFR Part 220 for educational institutions.

74.31, 1309.23(a)(2),
 1301.11(a), 1301.11(b)

Targeted Question for Fiscal Management Compliance Indicator 1E

Document Review: Insurance Policies

- ▶ Does insurance cover liability for accidents on grantee and delegate agency premises?
Applies To: Private Nonprofit Organizations
- ▶ Does the organization have transportation liability insurance, including collision coverage?
Applies To: Private Nonprofit Organizations
- ▶ Does the organization insure equipment (including vehicles) purchased using Head Start funds?
 74.31
- ▶ If student accident insurance is not a separate policy and is unidentifiable in the declaration page of a master policy, does confirmation exist from the insurer of accident coverage for Head Start students?
 1301.11(a)
Applies To: Private Nonprofit Organizations
- ▶ Do the payables files show the organization is current on its premium payments?
- ▶ Are officials and employees of private nonprofit organizations authorized to disburse program funds bonded or covered by a policy of insurance including employee dishonesty coverage?
Applies To: Private Nonprofit Organizations
- ▶ Does the grantee receive insurance rebates and credits allocable to Head Start?
- ▶ If yes, are those rebates and credits reflected in the grantee’s financial records as cash refunds or cost reductions, respectively?
- ▶ Review property records to identify facilities purchased or which have undergone major renovations using Head Start funds. Do the insurance policies reflect appropriate coverage for these assets?

Interview: Fiscal Officer (Insurance Policies)

- ▶ How does the program determine what amount of insurance is reasonable to cover liability for accidents on premises and for transportation activities engaged in by the program.
Applies To: Private Nonprofit Organizations
- ▶ How does the financial system ensure that insurance rebates and credits allocable to Head Start are applied as a cost reduction or cash refund?



► A concern was identified regarding authorization of officials and employees to disburse program funds. Ask the fiscal officer: Are officials and employees authorized to disburse program funds bonded or covered by a policy of insurance including employee dishonesty coverage? Can you show me documentation of coverage?

Applies To: Private Nonprofit Organizations



Fiscal Management

Fiscal Management Compliance Indicator 1F

Has the program addressed or is in the process of addressing any financial findings or weaknesses identified during the grantee’s past three OMB Circular A-133 Audits?

	74.26, 92.26
--	--------------

Targeted Question for Fiscal Management Compliance Indicator 1F

Pre-Site: Regional Office Fiscal Form

- ▶ Were any Regional Office concerns expressed in connection with any of the grantee’s OMB Circular A-133 Audits?
- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with any of the grantee’s OMB Circular A-133 Audits.

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc) to respond to the concerns in connection with any of the grantee’s OMB Circular A-133 Audits raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.



Fiscal Management

Fiscal Management Compliance Indicator 2A

Are program financial reports and accounting records current, accurate, and available? Do they contain information pertaining to grant or sub-grant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income? Reports include:

- Internal Revenue Service (IRS) 941 (Employer's Quarterly Federal Tax Return);
- IRS 990 (Return of Organization Exempt from Income Tax);
- IRS 5500 (Annual Return/Report of Employee Benefit Plan); and
- Other official Federal, State, and local reports as required by applicable law

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);

45 CFR Part 92 for State, local, and Tribal governments.

74.21(b)(1), 74.21(b)(2),
92.20(b)(1), 92.20(b)(2),
1304.23(b)(1)(i),
1304.51(h)(2)

Targeted Question for Fiscal Management Compliance Indicator 2A

Transaction: Journal Entries, Payroll and Non-Personnel Costs (General Ledger)

- ▶ Do amounts appear to be posted to the proper accounts? Please describe the evidence you observed in arriving at your conclusion.

Document Review: USDA/CACFP Documentation

- ▶ Did the organization file USDA reports within the required timeframe?
- ▶ For the most recently completed award period, compare budgeted USDA reimbursement to the actual amount received. If significant variances exist, can program staff provide reasonable explanations for the variances?
- ▶ Review the grantee's enrollment records, meal counts and most current USDA (CACFP) compliance/monitoring report or CACFP audit to determine whether available USDA funds are fully utilized by the program. Describe the evidence you reviewed in arriving at you conclusion.
- ▶ Is the grantee spending Head Start funds to purchase food service, groceries, eating and serving supplies or other items that could be paid with USDA funds if properly reported and claimed by the grantee?
- ▶ Does the grantee's most current USDA (CACFP) compliance/monitoring report or CACFP audit identify any areas of noncompliance related to fiscal issues?

Pre-Site: IRS Forms/Documentation

- ▶ Review the IRS Form 990. Was it due but not filed by the grantee?
Applies To: Nonprofit Organizations

Document Review: IRS Forms/Documentation

- ▶ Are any IRS Form 941 reports due, but not filed by the grantee?



- ▶ Review of the IRS Form 990 indicated that it was due but not filed. Was an extension obtained? Indicate the original due date and the extension due date, if an extension was obtained.

Applies To: Nonprofit Organizations

- ▶ On a sample basis, trace tax deposits reflected on the IRS Form 941 to evidence of payment (i.e., check or electronic transfer) on the bank statement. Was the organization current in its payroll taxes?
- ▶ Review IRS Correspondence file. Does the correspondence indicate any unresolved compliance issues such as penalties for late, missing or incomplete returns? If yes, describe all issues in detail.

Document Review: SF-269 Financial Reports

- ▶ For the most recently closed and audited Head Start award period, is the final SF-269 report reconciled to the audited financial statements and to the general ledger? Are reasonable explanations furnished for reconciling items?

Interview: Fiscal Officer (Financial Reports/Accounting Systems)

- ▶ How often are balance sheet accounts reconciled to subsidiary ledgers or external statements to substantiate that account balances are correct? Which accounts are reconciled?

Interview: Fiscal Officer (Audits)

- ▶ Describe the organization's process for review of annual OMB A-133 audits of delegate agencies and for addressing any issues of concern identified in the audit.

Applies To: Grantees with Delegates



Fiscal Management

Fiscal Management Compliance Indicator 2B

Are monthly financial status reports provided to program governing bodies, policy groups, and staff to advise them and to control program quality and maintain program accountability?

642(c)(1)(E)(i),
642(c)(1)(E)(ii),
642(c)(1)(E)(iii),
642(d)(2)(A),
642(c)(1)(E)(iv)(V)(bb)

Targeted Question for Fiscal Management Compliance Indicator 2B

Document Review: Financial Reports/Accounting Systems

- ▶ Are financial reports presented in logical groupings and with sufficient detail to allow the reader to understand the financial operations of the organization and the Head Start award?
- ▶ Are financial reports generated to support the management of organizational components for which they are responsible?
- ▶ Review reports provided to the governing body.
 - How much time elapsed between the end of the reporting period and the date on which reports were presented to the governing body? Did the organization present timely financial reports to the governing body?
 - Do financial reports include information on credit card expenditures? Describe the information contained in the reports related to the review of charges and authorization of signatures.
- ▶ How do the program and financial operations reports separately identify grant funds received and expended for each Early Head Start and Head Start Award (including separate identification of ARRA COLA and QI funding, if applicable)?

Interview: Policy Council or Policy Committee Member (Reporting)

- ▶ What financial and program operations reports do you receive? How and when do you receive them?
PDM4.1
Asked By: PDM
- ▶ What information do these reports include? Are they clear and understandable? If you have questions on the report, who answers your questions?
PDM4.1
Asked By: PDM
- ▶ How do the reports help you monitor the program's performance and progress?
PDM4.1
Asked By: PDM

Interview: Head Start/Early Head Start Director (Reporting)

- ▶ What financial and programmatic reports do you receive? How often do you receive the reports and how do you use them?
PDM8.1
Asked By: PDM



► What information do the reports you receive include? Discuss your review of copies of reports received by the Head Start director. Are they clear and comprehensive? Are they received on a consistent basis? Do they contain information that assists the director, in monitoring program quality and compliance?

PDM8.1

Asked By: PDM

► What other reports do you receive? How do the reports you receive help you keep track of the program's performance and progress towards program goals?

PDM8.1

Asked By: PDM

Interview: Governing Body Members (Reporting)

► What financial and program operations reports do you receive? How and when do you receive them?

PDM4.1

Asked By: PDM

► What information do these reports include? Are they clear and understandable? If you have questions on the report, who answers your questions?

PDM4.1

Asked By: PDM

► How do the reports help you monitor the program's performance and progress?

PDM4.1

Asked By: PDM

► How do you determine that credit card expenditures reflect costs that are necessary and reasonable for program operations?

PDM4.1

Asked By: PDM



Fiscal Management

Fiscal Management Compliance Indicator 3A

Does the program have a written code or standards of conduct governing the performance of its employees engaged in awarding and administering contracts?

*45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;
45 CFR Part 92 for State, local, and Tribal governments.*

74.42, 92.36(b)(3)

Targeted Question for Fiscal Management Compliance Indicator 3A

Pre-Site: Procurement Policies and Procedures

- ▶ Does the organization maintain a code of conduct for employees involved in contract award and administration, which ensures that no conflict of interest, real or apparent, occurs during contract award and administration? Please describe the evidence you observed in arriving at your conclusion.



Fiscal Management

Fiscal Management Compliance Indicator 3B

Does the program have written procurement procedures that provide, at a minimum, all requirements specified in the applicable Federal statutes?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;
45 CFR Part 92 for State, local, and Tribal governments.

92.36(c)(3), 74.44(a)

Targeted Question for Fiscal Management Compliance Indicator 3B

Document Review: Procurement Policies and Procedures

► Do the organization's written procurement procedures address the items required by 74.44(a)(1-3) or 92.36(c)(3), as appropriate for the type of institution being reviewed (e.g., nonprofit, commercial, state or Tribal)? Please describe the evidence you observed in arriving at your conclusion.

Interview: Fiscal Officer (Procurement)

► A concern was identified related to procurement procedures. Ask the fiscal officer: Has the organization adopted the required procurement procedures (as found in 74.44(a)(1-3) or 92.36(c)(3), depending on the organization type)?



Fiscal Management

Fiscal Management Compliance Indicator 3C

Are procurement transactions conducted in a manner that provides for open and free competition?

<p><i>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;</i></p> <p><i>45 CFR Part 92 for State, local, and Tribal governments.</i></p>	<p>74.43, 92.36(c), 74.48</p>
--	-------------------------------

Targeted Question for Fiscal Management Compliance Indicator 3C

Transaction: Non-Personnel Costs (General Ledger)

- ▶ Is procurement consistent with the organization's written policies and procedures? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is justification for sole source procurements documented? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does documentation show the organization obtained price quotations or bids as required by their own policies? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Personnel Costs (Transactions >\$100,000)

- ▶ Is there a bid guarantee from each bidder equivalent to five percent of the bid price?
- ▶ Is there a performance bond on the part of the contractor for 100 percent of the contract price?
- ▶ Is there a payment bond on the part of the contractor for 100 percent of the contract price?
- ▶ Were bonds are obtained from companies holding certificates of authority as acceptable sureties pursuant to 31 CFR part 223?
- ▶ Is there a provision to the effect that the recipient, the HHS awarding agency, the U.S. Comptroller General, or any of their duly authorized representatives, shall have access to any books, documents, papers and records of the contractor which are directly pertinent to a specific program for the purpose of making audits, examinations, excerpts and transcriptions?

Interview: Fiscal Officer (Procurement)

- ▶ Describe the program's procurement procedures for purchases below \$100,000.
- ▶ Describe the program's procurement procedures for purchases above \$100,000.



Fiscal Management

Fiscal Management Compliance Indicator 3D

Are the program's contracts and delegate agency agreements current, available, signed, and dated with a complete description of the performance and financial expectations of the grantee and the other parties? Can the grantee demonstrate that contractual agreements were met?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App A(A)(2)(g), 225, App A(C)(1)(j), 220, App A(A)(2)(e), 74.48(a), 74.48(b)

Targeted Question for Fiscal Management Compliance Indicator 3D

Transaction: Non-Personnel Costs (Transactions >\$100,000)

- ▶ Did the grantee maintain current, signed and dated contracts with a description of the services to be provided, an estimate of the time required, the rate of compensation, and provisions for termination?
- ▶ Did the contract entered into by the grantee adequately describe the performance and any financial expectations of the grantee and the other parties to the contract?
- ▶ Were contracted goods and services provided and compensation/payment requirements met by both parties? Describe the evidence you observed in arriving at your conclusion.

Document Review: Delegate Agency Agreements

- ▶ Review delegate agency agreements. Do the delegate agency agreements clearly state what the program is receiving under the delegate agency agreement? Do the delegate agency agreements adequately describe the performance and any financial expectations of the grantee and the delegate agency?

Applies To: Grantees with Delegates

- ▶ Does the agreement state that the grantee continues to have legal and fiscal responsibility for the grant? Is title to property retained by the grantee?

Applies To: Grantees with Delegates



Fiscal Management

Fiscal Management Compliance Indicator 4A

Are the program's original time records prepared properly and signed by the individual employee or the responsible supervisory official having first-hand knowledge of the actual work performed?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App B(8)(m)(1), 230, App B(8)(m)(2), 225, App B(8)(h)(1), 225, App B(8)(h)(4), 220, App A(J)(10)(a), 220, App A(J)(10)(b), 220, App A(J)(10)(d)

Targeted Question for Fiscal Management Compliance Indicator 4A

Transaction: Payroll (Salaries, Payroll & Other Compensation)

- ▶ Does evidence exist of payroll approval by a responsible organization official? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Do the hours reported on the timesheet reflect the hours recorded in the payroll journal? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does the salary distribution documented in the general ledger reflect the distribution of hours documented in the personnel activity report? Please describe the evidence you observed in arriving at your conclusion.
FIS5C
- ▶ Was the timesheet signed by the employee or a supervisory official having first-hand knowledge of the actual work performed? Please describe the evidence you observed in arriving at your conclusion.



Fiscal Management

Fiscal Management Compliance Indicator 4B

Are program staff charged to the grant compensated (salary and other forms of compensation) at a rate at or below Executive Level II?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal government;

2 CFR Part 220 for educational institution.

Consider gross pay from all funding sources.

Federal Executive Level II rates:

- *Cannot exceed \$179,700 through December 31, 2010.*
- *Could not exceed \$177,000 in 2009.*
- *Could not exceed \$172,200 in 2008.*

230, App A(A)(2)(b), 225, App A(C)(1)(d), 220, App A(C)(2), 653(b)(1), 653(b)(2)(A), 653(b)(2)(B)

Targeted Question for Fiscal Management Compliance Indicator 4B

Pre-Site: IRS Forms/Documentation

- ▶ Does the IRS 990 for the prior period show any employee with compensation exceeding the Level II rate?
Applies To: Nonprofit Organizations

Document Review: Salaries, Payroll & Other Compensation

- ▶ Do W-2 statements show any employee with compensation exceeding the Level II rate?
- ▶ For employees identified as having compensation exceeding the Executive Level II rate, is any portion of their compensation paid from Head Start funds or claimed as non-Federal share?
- ▶ For all employees identified as having compensation exceeding the Executive Level II rate and who are charged to Head Start or claimed as non-Federal share, list their names, job titles, amount of compensation charged to Head Start or claimed as non-Federal share and total compensation amounts. Provide details on which documents were used to identify this information



Fiscal Management

Fiscal Management Compliance Indicator 4C

Are program staff wages charged to the grant reasonable and supported by appropriate wage comparability data?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments.

230, App B(8)(c), 225, App B(8)(b), 653(a)

Targeted Question for Fiscal Management Compliance Indicator 4C

Document Review: Salaries, Payroll & Other Compensation

▶ Has the wage comparability study been revised within the last 3 years? Are the positions identified in the wage comparability study reasonably comparable to the organization's Head Start positions? Are comparisons based on the labor markets in which the organization competes?

Interview: Fiscal Officer (Wage Comparability Study)

- ▶ How does the grantee's compensation system ensure that employees are not compensated at a rate less than the minimum wage prescribed in the Fair Labor Standards Act?
- ▶ How does the financial system ensure that wages are consistent with wages paid for similar work in the grantee and delegate's other activities or to wages paid for similar work in the labor markets in which the organization competes?
- ▶ Were any cost of living adjustment (COLA) funds received by the grantee distributed in accordance with the terms of the grantee's funding award?
- ▶ Were any cost of living adjustment (COLA) increases received by the grantee applied to the grantee's pay scale as well as being distributed to existing employees?

Transaction: Payroll (Wage Comparability Study)

▶ Is the employee pay rate for Head Start work supported by the wage comparability study (or comparable to similar positions within the grantee or delegate organization)? Please describe the evidence you observed in arriving at your conclusion.



Fiscal Management

Fiscal Management Compliance Indicator 5A

Has the program implemented procedures to determine allowability, allocability, and reasonableness of costs as required?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;

45 CFR Part 92 for State, local, and Tribal governments.

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

Reasonable:

230(A)(A)(3)

225(A)(C)(1)(a)

220(A)(C)(2)

220(A)(C)(3)

Necessary:

230(A)(A)(3)(a)

225(A)(C)(1)(a)

Allocable:

230(A)(A)(2)(a)

225(A)(C)(1)(b)

220(A)(C)(4)(a)

Documentation of costs:

230(A)(A)(2)(g)

225(A)(C)(1)(j)

This question also relates to the "control environment" aspect of internal controls.

FOR NONPROFIT ORGANIZATIONS ONLY: Verify that the grantee and delegate have written procedures for determining the allowability, allocability, and reasonableness of costs in accord with 2 CFR Part 230 and 74.21(b)(6).

74.21(b)(6), 74.28, 92.23(a), 92.20(b)(5), 230, App A(A)(3), 230, App A(A)(3)(a), 230, App A(A)(2)(a), 225, App A(C)(1)(a), 225, App A(C)(1)(b), 225, App A(C)(1)(j), 220, App A(C)(2), 220, App A(C)(4)(a), 230, App A(A)(2)(g), 220, App A(C)(3)

Targeted Question for Fiscal Management Compliance Indicator 5A

Pre-Site: Regional Office Fiscal Form

- ▶ Were any Regional Office concerns expressed in connection with cost allocation by the grantee?
- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with cost allocation.

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc.) to respond to the concerns in connection with cost allocation raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.



Transaction: Journal Entries and Non-Personnel Costs (General Ledger)

► Was the cost posted to the appropriate award period? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Personnel Costs (General Ledger)

► Did documentation of receipt or acceptance by the program exist before the invoice was processed for payment? Please describe the evidence you observed in arriving at your conclusion.

► Was the cost supported by a contract, if appropriate? Please describe the evidence you observed in arriving at your conclusion.

► Are approvals of the documents supporting this transaction consistent with the approval process described in the organization's accounting policies and procedures? Is the approver someone other than the person making the order? Was a purchase order completed (if required by the organization's policies and procedures)? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Federal Share (General Ledger)

► Was the non-Federal share posted to the appropriate award period? Please describe the evidence you observed in arriving at your conclusion.

FIS5D

Transaction: Payroll (General Ledger)

► Was the work performed in the award period in which the related payroll cost was charged? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Personnel Costs (Allowable, Reasonable, Allocable)

► Is the cost allowable under the applicable cost principles? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Journal Entries (Allowable, Reasonable, Allocable)

► Does the cost appear to be necessary and reasonable for operation of the Head Start program? Please describe the evidence you observed in arriving at your conclusion.

► Was the cost allowable under the applicable cost principles? Please describe the evidence you observed in arriving at your conclusion.

► Was the invoice adequately descriptive to support the allowability of the cost? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Journal Entries and Non-Federal Share (Allowable, Reasonable, Allocable)

► Was the cost allocated to Head Start in proportion to the benefit received (as documented by the organization's cost allocation plan or other method of allocation)? Please describe the evidence you observed in arriving at your conclusion.



Interview: Fiscal Officer (Allowable, Reasonable, Allocable)

▶ A concern related to ensuring allowability, allocability, and reasonableness of costs was identified in the transaction guide. Ask the fiscal officer to describe the process for reviewing and approving charges before obligation or payment.

Transaction: Non-Federal Share (Allowable, Reasonable, Allocable)

▶ Does the claimed non-Federal share appear to be necessary for operation of the Head Start program and used to achieve program objectives? Please describe the evidence you observed in arriving at your conclusion.
FIS5D, FIS5E

Transaction: Non-Personnel Costs (Credit Card Transactions)

- ▶ Does the grantee maintain documentation with adequate description to support the allowability and allocability of the transaction? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is the credit card use consistent with the organization's written policy? Please describe the evidence you observed in arriving at your conclusion.

Document Review: Bank Reconciliations & General Ledger

▶ Does the organization have procedures for determining the allowability, allocability, and reasonableness of costs in accordance with the applicable cost principles? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Payroll (Job Descriptions)

▶ For staff with shared duties, examine payroll records and job descriptions. Do job descriptions describe duties and responsibilities that are reflected in the distribution of wage and appear to be of benefit to the Head Start program? Please describe the evidence you observed in arriving at your conclusion.
FIS5C



Fiscal Management

Fiscal Management Compliance Indicator 5B

APPLIES ONLY TO: Grantees with an approved negotiated indirect cost rate.

If the grantee charges indirect costs, are those costs supported by an approved negotiated indirect cost rate?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App A(E)(2)(c), 230, App A(E)(2)(d), 230, App A(E)(2)(e), 230, App A(E)(2)(f), 230, App A(E)(2)(g), 225, App A(H), 220, App A(G)(11)(g)

Targeted Question for Fiscal Management Compliance Indicator 5B

Pre-Site: SF-269 Financial Reports

- ▶ If the grantee has an established indirect cost agreement, is the total indirect cost on the most recent Final SF-269 computed per the approved indirect cost rate agreement?

Pre-Site: Regional Office Fiscal Form

- ▶ Does the grantee have a current, approved negotiated indirect cost rate agreement?
- ▶ Were any Regional Office issues of concern identified in connection with indirect costs for this grantee?
FIS5C
- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with indirect costs for this grantee.
FIS5C

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc) to respond to the concerns in connection with indirect costs raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.
FIS5C

Document Review: SF-269 Financial Reports

- ▶ Are the indirect costs charged to Head Start included in the grantee's development and administrative cost for the period? Please describe the evidence you observed in arriving at your conclusion.



Fiscal Management

Fiscal Management Compliance Indicator 5C

APPLIES ONLY TO: Grantees who do not have an approved negotiated indirect cost rate OR grantees that have an approved negotiated indirect cost rate and also have other allocated costs.

If the program shares costs with other programs, does the program utilize a method for allocating costs that reflects the relative degree of benefit for all programs receiving the benefit of the allocated cost?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

230, App A(A)(4)(a)(2), 225, App A(C)(3)(a), 220, App A(C)(4)(a)

Targeted Question for Fiscal Management Compliance Indicator 5C

Pre-Site: Regional Office Fiscal Form

- ▶ Is the grantee required to allocate costs between funding sources?
- ▶ Were any Regional Office issues of concern identified in connection with indirect costs for this grantee?
FIS5B
- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with indirect costs for this grantee.
FIS5B

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc) to respond to the concerns in connection with indirect costs raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.
FIS5B

Document Review: Cost Allocation Plan

- ▶ Does the grantee have a written cost allocation plan?
- ▶ If no, does the grantee have a method of allocating costs which reflects the relative degree of benefit for all programs sharing in the allocated cost? Describe the program’s method of allocating costs.
- ▶ Does the cost allocation plan identify staff who have shared duties in both the Head Start program and a program other than Head Start?
- ▶ If yes, describe in detail the grantee's methods for allocating costs for personnel.
- ▶ Document the full names of staff who have shared duties in both the Head Start program and a program other than Head Start.
- ▶ Does the grantee allocate the cost of facilities with shared use by both the Head Start program and other programs?
- ▶ If yes, describe in detail the grantee's methods for allocating costs for facilities use or occupancy.



- ▶ Document the address of the shared facility or facilities and which programs other than Head Start share use of the facility or facilities.
- ▶ Does the grantee allocate the cost of buses or other equipment of substantial value (>\$25,000) for which use is shared by the Head Start program and other programs?
- ▶ Describe in detail the grantee's methods for allocating costs for transportation (buses) or other shared equipment (>\$25,000).
- ▶ Provide a description of the shared item(s) of equipment (>\$25,000) or buses and which programs other than Head Start share use of the item(s).
- ▶ Does the grantee's allocated cost for each allocated position and other allocated costs reasonably reflect the relative benefit to the Head Start program of the allocated position or cost?

Transaction: Payroll (Salaries, Payroll & Other Compensation)

- ▶ Does the salary distribution documented in the general ledger reflect the distribution of hours documented in the personnel activity report? Please describe the evidence you observed in arriving at your conclusion.
FIS4A

Interview: Fiscal Officer (Allocation)

- ▶ Does the organization have programs other than Head Start, Early Head Start, and USDA Child and Adult Care Food Program (CACFP)?

Transaction: Payroll (Job Descriptions)

- ▶ For staff with shared duties, examine payroll records and job descriptions. Do job descriptions describe duties and responsibilities that are reflected in the distribution of wage and appear to be of benefit to the Head Start program? Please describe the evidence you observed in arriving at your conclusion.
FIS5A



Fiscal Management

Fiscal Management Compliance Indicator 5D

Is grantee- and delegate-claimed non-Federal participation verifiable from documentary records?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;
45 CFR Part 92 for State, local, and Tribal governments.

74.23(a)(1), 74.23(d),
 74.23(h)(2), 74.23(i)(1),
 74.23(i)(2), 92.24(c)(1),
 92.24(b)(6), 92.24(d),
 74.23(h)(1), 74.23(h)(3),
 92.24(g)

Targeted Question for Fiscal Management Compliance Indicator 5D

Pre-Site: Regional Office Fiscal Form

- ▶ Has the grantee received a waiver of non-Federal share?
- ▶ Identify the grantee’s applicable non-Federal share requirement.
- ▶ Were any Regional Office concerns expressed in connection with the grantee’s applicable non-Federal share requirement?
- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with the non-Federal share requirement.

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc) to respond to the concerns in connection with the non-Federal share requirement raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.

Transaction: Non-Federal Share (General Ledger)

- ▶ Was the non-Federal share posted to the appropriate award period? Please describe the evidence you observed in arriving at your conclusion.

FIS5A

Transaction: Non-Federal Share (Allowable, Reasonable, Allocable)

- ▶ Does the claimed non-Federal share appear to be necessary for operation of the Head Start program and used to achieve program objectives? Please describe the evidence you observed in arriving at your conclusion.

FIS5A, FIS5E

Pre-Site: SF-269 Financial Reports

- ▶ Review the supporting schedule for Non-federal share reported on the SF-269 for the most recently completed award period. Is the total amount on the grantee's supporting schedule at least as much as the amount reported on the SF-269? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Federal Share (Donated Time/Services)

- ▶ For volunteer services, is the nature and duration of the activity, service date, location in which the service was performed and volunteer signature included in the documentation? Please describe the evidence you observed in arriving at your conclusion.



-
- ▶ Are donated services or volunteer time documented by the same methods (to the extent feasible) used to support time worked by grantee or delegate employees?
 - ▶ If applicable to the type of donated service, are claims supported by records identifying number of children served and the service provided?

Transaction: Non-Federal Share (Donated Space)

- ▶ For donated space, is the claimed value supported by a current appraisal performed by an independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of the recipient? Please describe the evidence you observed in arriving at your conclusion.

FISSE



Fiscal Management

Fiscal Management Compliance Indicator 5E

Can the program demonstrate that its claimed non-Federal match through third-party contributions of volunteer services, goods, or supplies is allowable under the applicable cost principles and reasonable for accomplishing program objectives efficiently?

45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations;
45 CFR Part 92 for State, local, and Tribal governments.

74.23(a)(3), 74.23(a)(4),
 74.23(d), 74.23(f),
 92.24(a)(1), 92.24(b)(7)(i),
 92.24(c)(1), 74.23(a)(5)

The use of cash and in-kind contributions must meet the same standards applicable to an expenditure of grant funds. They must support the accomplishment of program objectives, not benefit individual children or their families.

Targeted Question for Fiscal Management Compliance Indicator 5E

Transaction: Non-Federal Share (Allowable, Reasonable, Allocable)

- ▶ Does the claimed non-Federal share appear to be necessary for operation of the Head Start program and used to achieve program objectives? Please describe the evidence you observed in arriving at your conclusion. FIS5A, FIS5D
- ▶ Has the grantee established that this non-Federal share donation has not already been counted towards a match for another Federal award? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Describe the valuation methodology for this non-Federal share transaction. Provide a detailed description of the information used by the grantee to determine the value of this non-Federal share transaction.

Document Review: Non-Federal Share

- ▶ Has the grantee claimed the use of parent in-home space as non-Federal share?
- ▶ If yes, describe the valuation methodology used for this non-Federal share transaction.
- ▶ Has the grantee identified transportation as an element of non-Federal share?
- ▶ Is yes, do grantee records describe who provided the transportation, the purpose of the transportation, mileage and rate applied to determine value?
- ▶ Did the grantee claim non-Federal share for any transportation provided by parents or any transportation provided in an automobile, van or other noncompliant vehicle not meeting transportation services requirements?
- ▶ Does the grantee identify any non-Federal match contributions in excess of \$25,000 in value for a single contribution of volunteer time or donated services, cash, supplies, equipment or other donated property in your sample?

Transaction: Non-Federal Share (Donated Time/Services)

- ▶ For volunteer services, is the rate used based on an internal scale established by the grantee or delegate agency or prevailing wages in the labor market in which the grantee or delegate competes? Please describe the evidence you observed in arriving at your conclusion.



-
- ▶ Do volunteer records describe the provision of services benefiting the Head Start program and the service date or dates? Please describe the evidence you observed in arriving at your conclusion.
 - ▶ Is documentation maintained to establish that the value claimed is reasonable for the type of service and the community in which the service is provided? Please describe the evidence you observed in arriving at your conclusion.
 - ▶ For services donated by employees of other organizations, is time for comparable services to the program valued at the volunteer's actual pay rate? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Federal Share (Donated Space)

- ▶ For donated space, is the claimed value supported by a current appraisal performed by an independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of the recipient? Please describe the evidence you observed in arriving at your conclusion.

FIS5D

Transaction: Non-Federal Share (Cash Donations)

- ▶ For cash matches, has the grantee established that this claimed match is not from funds paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost sharing or matching? Please describe the evidence you observed in arriving at your conclusion.
- ▶ For cash matches, was the cash counted as match when expended, not when received? Please describe the evidence you observed in arriving at your conclusion.

Transaction: Non-Federal Share (NFS Contributions >\$25,000)

- ▶ For non-Federal match contributions from a single source exceeding \$25,000, does the grantee maintain records which demonstrate that the contributions are allowable, allocable and reasonable, including the source, method of valuation and program use of the contributions? Please describe the evidence you observed in arriving at your conclusion.



Fiscal Management

Fiscal Management Compliance Indicator 6A

If the program owns facilities purchased or constructed using Head Start grant funds or made major renovations to facilities with Head Start grant funds, is documentation available to show that the facilities transactions were approved by the Regional Grants Management Officer and complied with Federal regulations?

2 CFR Part 230 for nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

1309.21(d), 1309.31(b),
1309.10, 1309.11,
1309.22(a), 1309.23(a),
1309.23(b), 1309.40

Targeted Question for Fiscal Management Compliance Indicator 6A

Fiscal Observations: Notices of Federal Interest

- ▶ If the grantee has purchased a modular unit situated on property owned by a third party, have they conspicuously posted on the modular unit a Notice of Federal Interest in compliance with 1309.31?

Pre-Site: Regional Office Fiscal Form

- ▶ Was the grantee awarded funds for purchase of a facility?

FIS6B

- ▶ Was the grantee awarded funds for construction of a facility?

FIS6B

- ▶ Was the grantee awarded funds for major renovation of a facility?

FIS6B

- ▶ Were any concerns expressed by the Regional Office in connection with the grantee’s construction, purchase or major renovations of any facility?

- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with the grantee’s construction, purchase or major renovations of any facility.

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc) to respond to the concerns in connection with in connection with grantee’s construction, purchase or major renovations of any facility raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.

Document Review: Fixed Asset Listing

- ▶ Is title to any facility purchased or constructed using Head Start grant funds held in the name of a third party other than the grantee (including delegate agencies)?

Transaction: Facilities (Construction of Facilities)

- ▶ Was written approval from the Regional Office received prior to commencement of construction of the facility to which the expense relates?



- ▶ For construction of facilities, is there title insurance on the property and physical destruction insurance, including flood insurance, as required in 1309.23(a)?
 - ▶ For construction of facilities, is there proof of required insurance submitted to the Regional Office, within five days as required in 1309.23(b)?
 - ▶ For construction of facilities, is there correspondence or other documents showing that a copy of the recorded Notice of Federal Interest to the Regional Office as required in 1309.40?
 - ▶ For construction of facilities, if the property been pledged as collateral to any bank of lender for the purpose of securing a loan, review the loan agreement to determine whether:
 - Permission of the Regional Office was received in advance of encumbering the property and if the loan agreement contains the provisions required in 1309.22?
 - Federal interest in the property was subordinated to the interest of the lender with the written consent of the funding agency? and;
 - Do the loan documents provide the funding agency with required rights in the event of default, withdrawal, or termination?
- FIS6D
- ▶ For construction of facilities, is there a compliant Notice of Federal Interest filed on record to protect the federal interest in the facility, as required in 1309.21?

Transaction: Facilities (Purchased Facilities)

- ▶ For a purchased facility, was an application submitted and written approval from the Regional Officer received prior to purchase of the facility to which the expense relates?

Applies To: Purchased Facilities (Modular or Non-Modular Unit)

- ▶ For a purchased facility, is there title insurance on the property (real estate) and physical destruction insurance, including flood insurance, as required in 1309.23(a) on the acquired facility?

Applies To: Purchased Facilities (Modular or Non-Modular Unit)

- ▶ For a modular unit located on property not owned by the grantee, does the grantee have an easement, right-of-way or rental agreement to allow it sufficient access to the modular unit as required in 1309.31(b)?

Applies To: Purchased Facilities (Modular Unit)

- ▶ For a purchased facility, is there correspondence or other documents showing that certified copies of the deed, lease, loan instrument, mortgage or any other legal document related to the purchase of the facility, including the recorded Notice of Federal Interest, were sent to the Regional Office within 10 days of their execution as required in 1309.40?

Applies To: Purchased Facilities (Modular or Non-Modular Unit)



- ▶ For a purchased facility, if the property been pledged as collateral to any bank or lender for the purpose of securing a loan, review the loan agreement to determine whether:
 - Permission of the Regional Office was received in advance of encumbering the property and if the loan agreement contains the provisions required in 1309.22?
 - Federal interest in the property was subordinated to the interest of the lender with the written consent of the funding agency? and;
 - Do the loan documents provide the funding agency with required rights in the event of default, withdrawal, or termination?

FIS6D

Applies To: Purchased Facilities (Modular or Non-Modular Unit)

- ▶ For a purchased facility (other than a modular unit), is there a compliant Notice of Federal Interest filed on record to protect the federal interest in the facility, as required in 1309.21?

Applies To: Purchased Facilities (Non-Modular Unit)

Transaction: Facilities (Major Renovations of Facilities)

- ▶ For major renovation to property owned by the grantee, is there a compliant Notice of Federal Interest filed on record to protect the federal interest in the facility, as required in 1309.21?

Applies To: Major Renovation to Property Owned by the Grantee

- ▶ For major renovation to property owned by the grantee, was a copy of the recorded Notice of Federal Interest and proof of submission to the Regional Office?

Applies To: Major Renovation to Property Owned by the Grantee

- ▶ For major renovation to grantee owned property, if the property been pledged as collateral to any bank of lender for the purpose of securing a loan, review correspondence to determine if permission of the Regional Office was received in advance of encumbering the property and if the loan agreement contains the provisions required in 1309.22.

FIS6D

Applies To: Major Renovation to Property Owned by the Grantee

- ▶ For major renovation to property not owned by the grantee, does the grantee's lease or other arrangement for occupancy provide the funding agency with the required right to designate a new lessee in the event of a default, withdrawal or termination?

Applies To: Major Renovation to Property Not Owned by the Grantee

- ▶ If the major renovation is on a facility owned by a third party, does the grantee have a lease or other arrangement which protects the Federal interest in the facility and ensures the grantee's undisturbed use and possession of the facility as described in 1309.21(d)(1) and (2)?

Applies To: Major Renovation to Property Not Owned by the Grantee

- ▶ For major renovation to property, is there correspondence or other written approval by Regional Office of the lease or other right of occupancy received before renovations were commenced?

Applies To: Major Renovation to Property



Fiscal Management

Fiscal Management Compliance Indicator 6B

Does the program have a process to ensure all contracts exceeding \$2,000 for constructing, renovating, or repairing buildings used by Head Start programs comply with the Davis-Bacon Act?

The Davis-Bacon Act requires that any contractor hired to construct, renovate, or repair a Head Start facility (if the contract exceeds \$2,000) must pay all laborers and mechanics engaged in the construction, renovation, or repair "prevailing rate" wages. Under the provisions of the Act, contractors or their subcontractors are to pay workers employed directly on the work site no less than the locally prevailing wages and fringe benefits paid on projects of a similar character. The Davis-Bacon Act directs the Secretary of Labor to determine such local prevailing wage rates. (Department of Labor, <http://www.dol.gov/esa/programs/DBRA>)

1309.54

Targeted Question for Fiscal Management Compliance Indicator 6B

Pre-Site: Regional Office Fiscal Form

► Was the grantee awarded funds for purchase of a facility?
FIS6A

► Was the grantee awarded funds for construction of a facility?
FIS6A

► Was the grantee awarded funds for major renovation of a facility?
FIS6A

Document Review: Construction, Renovation and Repair Contracts

► Does the program have Head Start-funded contracts exceeding \$2000 for constructing, renovating or repairing buildings (facilities)?

► Review building construction, renovation, and repair contracts; bid and award materials, contract, purchase orders; DOL Wage Determination, WH-347 Payroll Form and any other wage payment files. For Head Start-funded contracts exceeding \$2,000 for constructing, renovating or repairing buildings (facilities):

- Did the grantee provide an assurance that all laborers and mechanics employed by contractors or subcontractors be paid wages not less than those prevailing on similar construction in the locality, as determined by the Secretary of Labor (DOL)?
- In each solicitation or award did the grantee include a copy of the current prevailing wage determination issued by the U. S. Department of Labor (DOL) and condition award of the contract on the contractor's acceptance of the wage determination?
- Did the grantee obtain payroll certifications or other proof of wages paid from the contractor?
- Were wages paid by contractors or subcontractors to any individuals engaged in the construction, renovation or repairs under the contract at or above the established prevailing wage?

► A concern was identified related to Head Start-funded contracts for construction, renovation, or building repairs. Ask the fiscal officer: How does the financial system assure that laborers and mechanics are paid prevailing rate wages on Head Start-funded construction, renovation, or repair contacts exceeding \$2,000?

Transaction: Facilities (Construction of Facilities)

► For construction of facilities, did the grantee obtain documentation from construction contractors and subcontractors to ensure compliance with the Davis-Bacon Act prevailing wage requirement?



Fiscal Management

Fiscal Management Compliance Indicator 6C

Does the program meet property management standards for equipment purchased using Head Start funds, including conducting a physical inventory every 2 years and maintaining vehicle titles?

45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);
45 CFR Part 92 for State, local, and Tribal governments.

74.34(g), 92.31, 92.32,
 74.34(f)(1)(i), 74.34(f)(1)(ii),
 74.34(f)(1)(iii),
 74.34(f)(1)(iv),
 74.34(f)(1)(v),
 74.34(f)(1)(vi),
 74.34(f)(1)(vii),
 74.34(f)(1)(viii), 74.34(f)(3),
 74.32(c)

Targeted Question for Fiscal Management Compliance Indicator 6C

Observation: Fiscal Observations

- ▶ Test whether property records are accurate, complete and up to date. Select a few items from the property records, including at least one item that was purchased within the last year. For review purposes, focus on buses and other vehicles, large playground equipment, communication/electronic systems and items valued in excess of \$25,000. However, property worth at least \$5,000 must be included in the property records. Physically observe the asset to determine if the listed property is present in the program. Describe what you observed.
- ▶ Test whether property records are accurate, complete and up to date. Look around the program and find a few items, focusing on those that were acquired during the last year, including more costly items such as buses and other vehicles, large playground equipment, communication/electronic systems and items valued in excess of \$25,000. Review receipts, purchase agreements or other records indicating date of purchase and value of items. Trace back to property records to determine if property over \$5,000 in value is properly included in the property records. Is the inventory document signed by the person or persons who observed the inventory? Describe what you observed.

Document Review: Regional Office Correspondence

- ▶ Do the grantee’s records demonstrate that it obtains approval prior to disposition of equipment and facilities subject to a federal interest?

Interview: Fiscal Officer (Inventory and Equipment Records)

- ▶ How does the financial system ensure that records are maintained for all equipment with a unit cost of \$5,000 or more?
- ▶ A concern has been identified related to property records. Physical observations and property record reviews are not consistent with the property observed. Can you explain the inconsistencies which have been identified?



Fiscal Management

Fiscal Management Compliance Indicator 6D

APPLIES ONLY TO grantees that have mortgaged, pledged or encumbered property acquired (in whole or in part) with Head Start funds or has been the subject of major renovations using Head Start funds.

If the grantee has entered into any mortgage or other loan agreements using as collateral property which was acquired (in whole of in part) with Head Start funds or was the subject of a major renovation, did the grantee obtain Regional Office advanced permission and include required language in the mortgage or other loan agreement?

<p><i>45 CFR Part 74 for nonprofit organizations and educational institutions (universities and colleges);</i></p> <p><i>45 CFR Part 92 for State, local, and Tribal governments.</i></p>	<p>74.37, 92.31(b), 1309.21(b), 1309.21(f)</p>
---	--

Targeted Question for Fiscal Management Compliance Indicator 6D

Document Review: Loan Agreements

- ▶ Review loan agreements to determine whether loans are secured by assets and property owned by the organization. Are the agreements secured by either all assets of the organization or by assets acquired or improved with Head Start funds?
- ▶ The property pledged as collateral was subject to a federal interest. Was the federal interest subordinated to the rights of the lender with written permission of the Regional Office in a loan agreement which requires the lender to give written and telephonic notice to ACF in the event of a default in payment by the grantee?

Document Review: Regional Office Correspondence

- ▶ A concern was identified related to using property purchased or renovated with Federal funds as collateral. Review Regional Office correspondence to determine whether written approval was obtained before using property purchased or renovated with Federal funds as collateral.

Document Review: Bank Reconciliations & General Ledger

- ▶ Does the balance sheet show notes or mortgages payable? If yes, describe.
- ▶ Does the program’s OMB A-133 audit show notes or mortgages payable? If yes, describe.

Transaction: Facilities (Construction of Facilities)

- ▶ For construction of facilities, if the property been pledged as collateral to any bank of lender for the purpose of securing a loan, review the loan agreement to determine whether:
 - Permission of the Regional Office was received in advance of encumbering the property and if the loan agreement contains the provisions required in 1309.22?
 - Federal interest in the property was subordinated to the interest of the lender with the written consent of the funding agency? and;
 - Do the loan documents provide the funding agency with required rights in the event of default, withdrawal, or termination?

FIS6A



Transaction: Facilities (Purchased Facilities)

- ▶ For a purchased facility, if the property been pledged as collateral to any bank or lender for the purpose of securing a loan, review the loan agreement to determine whether:
 - Permission of the Regional Office was received in advance of encumbering the property and if the loan agreement contains the provisions required in 1309.22?
 - Federal interest in the property was subordinated to the interest of the lender with the written consent of the funding agency? and;
 - Do the loan documents provide the funding agency with required rights in the event of default, withdrawal, or termination?

FIS6A

Applies To: Purchased Facilities (Modular or Non-Modular Unit)

Transaction: Facilities (Major Renovations of Facilities)

- ▶ For major renovation to grantee owned property, if the property been pledged as collateral to any bank of lender for the purpose of securing a loan, review correspondence to determine if permission of the Regional Office was received in advance of encumbering the property and if the loan agreement contains the provisions required in 1309.22.

FIS6A

Applies To: Major Renovation to Property Owned by the Grantee

Interview: Fiscal Officer (Rental or Occupancy Agreements)

- ▶ A concern was identified related to rental or occupancy arrangements for the program entered into with related parties. How does the financial system ensure that the cost of space charged against the grant or claimed as non-federal share by the grantee does not exceed costs such as depreciation or use allowance, plus maintenance, taxes, and insurance?

FIS6E



Fiscal Management

Fiscal Management Compliance Indicator 6E

APPLIES ONLY TO grantees with leases, donated space or other property transactions with a related party.

Did the program properly account for any rental or property transactions with related parties (i.e., less than arms length relationships)?

2 CFR Part 230 for private nonprofit organizations;

2 CFR Part 225 for State, local, and Tribal governments;

2 CFR Part 220 for educational institutions.

A transaction is between related parties if parties to the agreement share family members (either individually or through ability to influence the organization) are a parent and subsidiary organization, have overlapping directors and officers or are a grantee and a delegate agency of the grantee.

230, App B(43)(c), 225, App B(37)(c), 220, App A(J)(43)(c)

Targeted Question for Fiscal Management Compliance Indicator 6E

Document Review: Leases & Rent Documents

- ▶ Were any leases or occupancy agreements entered into between the grantee and a related party (e.g. the grantee and a delegate agency or a grantee and one of its programs or a property holding company related to the grantee)? Describe the basis for your conclusion that the parties are related.
- ▶ A concern was identified related to cost of space. Review the financial records of the grantee and the related party. Is the cost of space charged against the grant or claimed as non-federal share by the grantee limited to depreciation or use allowance, plus maintenance, taxes, and insurance? Please describe the evidence you observed in arriving at your conclusion.

Pre-Site: IRS Forms/Documentation

- ▶ Does the IRS Form 990 identify any related parties under the organization's control (or a related party controlling the organization)?

Applies To: Nonprofit Organizations

- ▶ Are any leases with related parties identified in the review of the IRS Form 990?

Applies To: Nonprofit Organizations

Interview: Fiscal Officer (Rental or Occupancy Agreements)

- ▶ A concern was identified related to rental or occupancy arrangements for the program entered into with related parties. How does the financial system ensure that the cost of space charged against the grant or claimed as non-federal share by the grantee does not exceed costs such as depreciation or use allowance, plus maintenance, taxes, and insurance?

FIS6D



Fiscal Management

Fiscal Management Compliance Indicator 6F

If the grantee, a related party to the grantee or a delegate agency owns any of the facilities used by the Head Start program that were not purchased with Federal funds, are occupancy charges limited to depreciation or a use allowance of 2% or less?

225, App B(11), 230, App B(11), 220, App A(J)(14)

Targeted Question for Fiscal Management Compliance Indicator 6F

Document Review: Leases & Rent Documents

- ▶ Does review of any lease or occupancy agreement or transaction detail show charges for use of grantee-owned space?

Document Review: Fixed Asset Listing

- ▶ You have identified that the grantee charges for use of space owned by the grantee, a delegate agency of the grantee or a related party to the grantee. Review fixed asset records, and record the original cost and the cost of any improvements of the property and the fee charged to Head Start. Does this charge represent only the depreciation or a use allowance of 2% or less (if the property is fully depreciated), plus maintenance, taxes and insurance?

Transaction: Non-Federal Share (Donated Space)

- ▶ For use of grantee- or delegate-owned buildings, trace entries to the source records. Are claims for use of grantee- or delegate-owned space based on depreciation or use allowance derived from the building cost reflected in the organization's records and excluding acquisition or renovation costs paid by the Federal Government? Please describe the evidence you observed in arriving at your conclusion.

Interview: Fiscal Officer (Rental or Occupancy Agreements)

- ▶ A concern has been identified related to the charges for use of space owned by the grantee, a delegate agency of the grantee or a related party to the grantee. Ask the fiscal officer: How does the financial system ensure that claims for the use or occupancy of such space are based on depreciation derived from the building cost reflected in the organization's records and excluding acquisition or renovation costs paid by the Federal Government or use allowance of 2% or less



Introduction: Program Design and Management

Effective management systems are critical to Head Start programs. Head Start's goal in this area is to ensure that programs design and implement comprehensive systems that are in compliance with all standards and regulations and provide quality services to children and families. In order to assess compliance in this area, reviewers should be prepared to conduct a comprehensive analysis of the program's management policies and procedures and governance practices, in addition to assessing the level of implementation throughout the program.

The **Program Design and Management** section of the Protocol is divided into thirteen (13) Compliance Frameworks:

- Program Governance—Structure
- Program Governance—Policies and Training
- Program Governance—Duties and Responsibilities
- Program Governance—Reporting to Governance Groups
- Program Planning
- Ongoing Monitoring
- Record Keeping
- Reporting
- Communication
- Human Resources—Staffing and Structure
- Human Resources—Developing and Implementing Personnel Policies
- Human Resources—Training and Professional Development
- Program Strengths



Program Design and Management

Program Design and Management Compliance Framework #1 - Program Governance: Structure

The grantee ensures program integrity and oversight of quality services to children and families and supports appropriate decisions related to program design and implementation by establishing and maintaining formal and effective program governance.

Compliance Indicators:

1.1 The grantee has a governing body composed of:

- At least 1 member with background and expertise in accounting or fiscal management.
- At least 1 member with background and expertise in early childhood education and development.
- At least 1 member who is a licensed attorney
- Additional members who reflect the community and include parents of formerly or currently enrolled Head Start/EHS children and
- Other members selected for their expertise in education, business administration or community affairs.

642(c)(1)(B)(i),
642(c)(1)(B)(ii),
642(c)(1)(B)(iii),
642(c)(1)(B)(iv),
642(c)(1)(B)(vi)

1.2 The program has established a Policy council or Policy Committee (delegate agency) as early in the year as possible, in accordance with Head Start requirements, which is comprised of a majority of parents and which is responsible for the Head Start program’s direction, program design, operation and goal planning.

642(c)(2)(B)(ii)(I),
642(c)(2)(B)(ii)(II),
642(c)(2)(B)(i),
642(c)(2)(A)

1.3 Parent Committees are established at the center level as early in the program year as possible and are comprised exclusively of the parents of children currently enrolled in the program.
If option is other than center-based, an equivalent parent group or groups must represent parents at the local level.

1304.50(a)(1)(iii)

Notes: (1) Exceptions shall be made to the requirements of clauses (i) to (iv) for members of a governing body when those members oversee a public entity and are selected to their positions with the public entity by public selection or political appointment. (2) If a Head Start agency is unable to include members for any of the first three categories above, the governing body must obtain the services of a consultant or other individual with the required background and expertise to work with the governing body instead

Targeted Questions for Program Design and Management Compliance Framework #1 - Program Governance: Structure

Pre-Site: Governing Body Membership Roster

► What is the total number of governing body members serving on the board?

PDM1.1

► If the board has additional members, how are the additional members of the board reflective of the community?

PDM1.1

► Is at least one member of the board a parent of a child currently or formerly enrolled in the Head Start program?

PDM1.1



► Review the Governing Body Membership Roster and identify which members have the required background and expertise. Identify the name, title and experience/qualifications of required Governing Body members. If no member meets one of the criteria, indicate whether the required expertise is met through a consultant agreement.

PDM1.1

Interview: Governing Body Members (Composition)

► Ask the governing body member whether the required expertise (that was missing among the governing body's members) is met through a consultant agreement, then determine whether the consultant meets the requirements.

PDM1.1

► Determine whether a member is a parent of a child currently or formerly enrolled in the program.

PDM1.1

Pre-Site: Policy Council Membership Roster

► Review the Policy Council or Policy Committee membership roster to determine whether at least 51 percent of the membership is comprised of parents of children currently enrolled in the program and whether all other members are drawn from the community served by the Head Start agency, including any delegate agency. Membership may include parents of formerly enrolled children.

PDM1.2

Interview: Policy Council or Policy Committee Member (Composition)

► Does the program have an active Policy Council (or Policy Committee)? At what point in the year was it established? How often do they meet?

PDM1.2

Pre-Site: Policy Council Membership Roster

► Does a review of the documents validate that Parent Committees, comprised exclusively of parents, are established at the local level as early in the program year as possible?

PDM1.3



- ▶ Have all centers or other program options established parent committees? How many are there? Who are the members? When are they formed? What do they do?

PDM1.3

Interview: Policy Council or Policy Committee Member (Policy Council and Policy Committee Member Responsibilities)

- ▶ Can you describe some of the activities and decisions the Policy Council makes regarding planning for the Head Start program, such as selecting program options, making policies for operating the program, or planning goals? How do you help the Head Start program decide what it is going to do to help children and families?

PDM1.2



Program Design and Management

Program Design and Management Compliance Framework #2 -Program Governance: Policies and Training

The grantee ensures that the Governing Body and Policy Council (or Policy Committee) maintain policies regarding conflict of interest, compensation and reimbursement and receive appropriate training and technical assistance to support program oversight and decision making.

Compliance Indicators:

2.1 Members of the Governing Body and Policy Council receive appropriate training and technical assistance to assure members understand information they receive and can provide effective oversight and make appropriate decisions.

642(d)(3)

2.2 Policy Council and Policy Committee members are supported by the program in fulfilling their governance responsibilities by receiving reasonable reimbursement of their expenses for participation.

1304.50(f)

2.3 Members of the Governing Board and Policy Council are free from financial or other conflict of interest with the Head Start/Early Head Start agency and do not receive compensation for serving on these bodies.

642(c)(2)(C)(i),
642(c)(2)(C)(ii),
642(c)(3)(B),
1304.50(b)(6),
642(c)(1)(C)(i),
642(c)(1)(C)(ii),
642(c)(1)(C)(iii),
642(c)(1)(C)(iv),
642(c)(1)(E)(iv)(X)(aa)

Note: In determining if governing body members and members of their immediate families are free of financial or other conflict of interest, consider that they: (1) Are not employees of the program, or related to employees, and not vendors to the grantee or delegate; (2) Have no financial conflict of interest with the grantee (including a delegate agency); (3) Receive no compensation for serving on the governing body or for providing services to the grantee; and (4) Operate as an entity independent of staff employed by the grantee (e.g., are not influenced by the staff of the grantee.)

Targeted Questions for Program Design and Management Compliance Framework #2 -Program Governance: Policies and Training

Interview: Governing Body Members and Policy Council or Policy Committee Member (Training)

► Describe the training that you received and whether you feel it was appropriate to allow you to be effective in your role? When did you receive training and where is it documented?

PDM2.1

Interview: Policy Council or Policy Committee Member (Conflict of Interest)

► Do parents receive reimbursement for reasonable expenses to participate fully as a Policy Council member?

PDM2.2



- ▶ Are you or any member of your immediate family an employee of the grantee or delegate or related to an employee of the grantee or delegate?

PDM2.3

- ▶ Do you receive compensation for serving on the Policy Council or Policy Committee or for providing services to the Head Start agency?

PDM2.3

Document Review: IRS Forms/Documentation

- ▶ Review W-2 Statements and IRS Form 1099's to determine if the grantee paid wages or made payments as an independent contractor to a member of the governing body.

PDM2.3

Reviewed By: Fiscal

Document Review: Governing Body By-Laws or Procedures

- ▶ Does review of Governing Body By-Laws or Governing Body procedures verify that members can have no financial conflict of interest with the Head Start or Early Head Start program, including members not being able to receive compensation for membership or services to the program and not being employed by the program?

PDM2.3

Document Review: Policy Council By-Laws or Procedures

- ▶ Does review of Policy Council By-Laws or Policy Council procedures verify that members can have no conflict of interest with the Head Start or Early Head Start program including members not being able to receive compensation for serving on Policy Council or providing services to the program and not being regularly employed by the program.

PDM2.3

Interview: Governing Body Members (Conflict of Interest)

- ▶ Are you, or any member of your immediate family, employed by the grantee or delegate agency?

PDM2.3

- ▶ Do you receive compensation for serving on the Governing Body or for providing services to the Head Start agency?

PDM2.3



Program Design and Management

Program Design and Management Compliance Framework #3 -Program Governance: Duties and Responsibilities

The Governing Body and Policy Council (and/or Policy Committee) are actively engaged in informed decision making, ensuring program integrity and fully participating in the development, planning and monitoring of the Head Start and/or Early Head Start program.

Compliance Indicators:

3.1 The Governing Body performs required activities and makes decisions pertaining to program administration and operations.

642(c)(1)(E)(iv)(I),
642(c)(1)(E)(iv)(II),
642(c)(1)(E)(iv)(III),
642(c)(1)(E)(iv)(VI),
642(c)(1)(E)(iv)(X)

3.2 The Governing Body approves financial management, accounting and reporting policies.

642(c)(1)(E)(iv)(VII)(a
a),
642(c)(1)(E)(iv)(VII)(b
b),
642(c)(1)(E)(iv)(VII)(c
c),
642(c)(1)(E)(iv)(VII)(d
d)

3.3 The governing body reviews and approves all major policies of the grantee.

642(c)(1)(E)(iv)(V)(aa
) ,
642(c)(1)(E)(iv)(V)(bb
) ,
642(c)(1)(E)(iv)(V)(cc
) , 642(c)(1)(E)(iv)(VIII),
642(c)(1)(E)(iv)(IX)

3.4 Policy Council (or Policy Committee) approves and submits to the governing body decisions about identified program activities.

642(c)(2)(D)(i),
642(c)(2)(D)(ii),
642(c)(2)(D)(iii),
642(c)(2)(D)(iv),
642(c)(2)(D)(v),
642(c)(2)(D)(vi),
642(c)(2)(D)(vii),
642(c)(2)(D)(viii)



Targeted Questions for Program Design and Management Compliance Framework #3 -Program Governance: Duties and Responsibilities

Pre-Site: Governing Body Meeting Minutes

► Review the governing body meeting minutes or other documents as needed to determine if there is evidence that the governing body conducted each of the following required activities:

PDM3.1

- Selected delegate agencies, as appropriate
- Established procedures and criteria for recruiting, selecting and enrolling children
- Developed procedures for selecting Policy Council members, and
- Reviewed applications for funding and amendments to applications for funding.
- Describe how and when each of the activities listed above occurred.

PDM3.1

► Review the governing body meeting minutes or other documents as needed and Indicate whether each of the following documents, policies or procedures was reviewed and approved.

PDM3.2

- Annual Self Assessment
- Financial audit
- Program's progress in carrying out the grant application provisions, including implementation of corrective actions
- Personnel policies regarding hiring, evaluation, termination, and compensation
- Policies and procedures regarding hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Financial Officer, or other person in an equivalent position
- Results from monitoring, including appropriate follow-up activities
- Grantee's major financial expenditures
- Grantee's annual operating budget
- Selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors who report all critical accounting policies and practices to the governing body
- Monitoring of the agency's actions to correct audit findings and monitoring of other action necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices

Document Review: Standards of Conduct

► Have written standards of conduct been established and approved for disclosing, addressing, and resolving complaints, including investigations? How often are these standards updated?

PDM3.1

Interview: Governing Body Members (Governing Body Responsibilities)

► How are you involved in making decisions pertaining to program administration and operations? Can you describe some of the activities and decisions the Governing Body makes to ensure effective program operations?

PDM3.1

► How and when does the governing body review applications for funding and amendments to applications for funding?

PDM3.1



- ▶ What procedures has the governing body developed for selecting Policy Council members?

PDM3.1

- ▶ How does the governing body select delegate agencies?

PDM3.1

- ▶ How does the governing body establish procedures and criteria for recruiting, selecting, and enrolling children?

PDM3.1

- ▶ In your role of overseeing and safeguarding federal funds, what is the governing body's process for approving the operating budget, financial expenditures, selecting independent auditors and monitoring the programs actions for correcting audit findings and other actions necessary to comply with applicable laws governing fiscal and accounting practices?

PDM3.2

- ▶ How do you select independent financial auditors? How and what do they report to the governing body?

PDM3.2

- ▶ Can you describe the process of reviewing and approving the program's progress in carrying out the grant application provisions?

PDM3.3

- ▶ How do you review and approve personnel policies regarding hiring, evaluation, compensation, and termination of employees? Additionally, how are such policies reviewed and approved for the Executive Director, Head Start Director, Director of Human Resources, and Chief Financial Officer or any other person in an equivalent position with the agency?

PDM3.3

- ▶ How are the results from federal monitoring shared with you, including appropriate follow-up activities?

PDM3.3

- ▶ Describe the process for reviewing and approving the annual Self Assessment.

PDM3.3



Pre-Site: Policy Council Meeting Minutes

► Review Policy Council Meeting Minutes. Did the Policy Council/Committee approve and submit to the governing body decisions about each of the following activities:

PDM3.4

- Program recruitment, selection, and enrollment priorities
- By-laws for Policy Council operation
- Applications for funding and amendments to applications for funding for programs before application submission
- Budget planning for program expenditures, including policies for reimbursement and participation in Policy Council activities
- Program personnel policies and decisions regarding employment of all program staff, including standards of conduct for program staff, contractors, and volunteers and criteria for employment and dismissal of program staff
- Developing procedures for electing Policy Council member
- Recommendations for selecting program agencies and service areas for such agencies

Interview: Policy Council or Policy Committee Member (Policy Council and Policy Committee Member Responsibilities)

► How has the Policy Council/Committee approved and submitted to the governing body decisions about each of the following activities:

- Program recruitment, selection, and enrollment priorities
- By-laws for Policy Council operation
- Applications for funding and amendments to applications for funding for programs before application submission
- Budget planning for program expenditures, including policies for reimbursement and participation in policy council activities
- Program personnel policies and decisions regarding employment of all program staff, including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff
- Developing procedures for electing policy council members
- Recommendations on the selection of program agencies and service areas for such agencies

PDM3.4



Program Design and Management

Program Design and Management Compliance Framework #4 - Program Governance: Reporting to Governance Groups

The Governing Body and Policy Council (and/or Policy Committee) regularly receive and use reports about program planning, policies, operations and finances to assist them in program oversight and decision making.

Compliance Indicators:

4.1 Governing Body and Policy Council (or Policy Committee) members regularly receive and use the following information or reports about program planning, policies and agency operations:

- Monthly financial statements, including credit card expenditures
- Monthly program information summaries
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Monthly reports of meals and snacks provided through USDA programs
- Financial audit
- Annual Self Assessment, including findings related to such assessment
- Community-wide strategic planning and needs assessment (i.e., Community Assessment) of the Head Start agency, including applicable updates
- Communication and guidance from the Secretary
- Annual Program Information Reports

642(d)(2)(A),
642(d)(2)(B),
642(d)(2)(C),
642(d)(2)(D),
642(d)(2)(E),
642(d)(2)(F),
642(d)(2)(G),
642(d)(2)(H),
642(d)(2)(I),
642(c)(1)(E)

Targeted Questions for Program Design and Management Compliance Framework #4 - Program Governance: Reporting to Governance Groups

Interview: Policy Council or Policy Committee Member (Reporting)

► What financial and program operations reports do you receive? How and when do you receive them?

PDM4.1

FIS2B

► What information do these reports include? Are they clear and understandable? If you have questions on the report, who answers your questions?

PDM4.1

FIS2B

► How do the reports help you monitor the program's performance and progress?

PDM4.1

FIS2B

Interview: Governing Body Members (Reporting)

► What financial and program operations reports do you receive? How and when do you receive them?

PDM4.1

FIS2B



► What information do these reports include? Are they clear and understandable? If you have questions on the report, who answers your questions?

PDM4.1

FIS2B

► How do the reports help you monitor the program's performance and progress?

PDM4.1

FIS2B

► How do you determine that credit card expenditures reflect costs that are necessary and reasonable for program operations?

PDM4.1

FIS2B

Document Review: Governing Body and Policy Council Reports

► Before conducting your interviews, review a sample of reports provided to the Governing Body and Policy Council. Are reports received on a regular schedule? Do reports contain sufficient information to assist these bodies in fulfilling their monitoring and decision making responsibilities? Make note of any concerns regarding regularity, report content, etc.

- Monthly financial statements, including credit card expenditures
- Monthly program information ongoing monitoring summaries
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Monthly reports of meals and snacks provided through Department of Agriculture programs
- Financial audit
- Annual Self Assessment, including findings related to such assessment
- Community-wide strategic planning and needs assessment (i.e., Community Assessment) of the Head Start agency, including applicable updates
- Communication and guidance from the Secretary
- Annual Program Information Reports (PIR)

PDM4.1

Summary Analysis: Program Governance

► Has the governing body fulfilled its major responsibilities, including legal and fiscal administration and oversight; ensuring active, independent and informed governance; and ensuring compliance with applicable



laws and regulations? Summarize the governing body's ability to fulfill its major responsibilities and ensure program integrity. In preparing this summary, consider your analysis of the governing body's effectiveness with respect to each of the following:

- Training and technical assistance
- Reporting
- Activities to support program administration and implementation
- Approval of all major policies
- Approval of financial management, accounting, and reporting policies

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM4.1



Program Design and Management

Program Design and Management Compliance Framework #5 -Program Planning

The Grantee has developed a process for systematic program planning which leads to the development and implementation of quality services that meet the needs of children and families in the community it serves.

Compliance Indicators:

<p>5.1 The grantee (and delegate) in consultation with staff, governing bodies, policy groups, and other community organizations routinely engages in a process of systematic planning which utilizes the results of the Community Assessment and Self Assessment and other information, and leads to the development of long and short term goals for improvement and written plans for service implementation.</p>	<p>1304.51(a)(1), 1304.51(a)(1)(ii), 1304.51(a)(1)(iii), 1304.51(a)(2)</p>
<p>5.2 At least annually, the program conducts a Self Assessment of program effectiveness which assesses progress in meeting local program goals and objectives, evaluates program compliance with Federal requirements and results in improvement plans that are approved by the Governing Body and submitted to OHS.</p>	<p>641A(g)(1), 1304.51(i)(1), 641A(g)(2)(B)</p>
<p>5.3 The program uses a Community Assessment process to collect and assess information regarding community strengths, needs and gaps in services, and to formulate goals and objectives on how to best serve young children and families in the program’s service area.</p>	<p>1304.51(a)(1)(i), 1304.51(a)(1)(ii), 1305.3(c), 1305.3(d), 1305.3(e)</p>
<p>5.4 Based on the Community Assessment and other information, the program operates one or more of the approved program options in accordance with applicable regulations.</p>	<p>1306.33(a)(1), 1306.33(a)(2), 1306.36, 1306.31(a), 1306.31(b), 1306.34(a)(2), 1306.32(b)(2), 1306.32(b)(3), 1306.35(a)(1)</p>
<p>Note: The 2007 Head Start Act refers to the Community Assessment as a community-wide strategic planning and needs assessment.</p>	

Targeted Questions for Program Design and Management Compliance Framework #5 -Program Planning

Interview: ERSEA Coordinator (Community Assessment and Program Planning)

► Describe how information from the annual self assessment is incorporated into your ERSEA planning and implementation.

PDM5.1

► Describe how information from the community assessment (and its updates) is incorporated into your ERSEA planning and implementation.

PDM5.1



- ▶ Describe how the program determined the types of program options to offer and what information guided these decisions.

PDM5.4

Pre-Site: Service Plans and Program Plans

- ▶ Has the program developed plans for implementing services in each of the program areas (ECD, Health and Nutrition, FCS, Disabilities, and PDM including ERSEA) which have been reviewed and approved by Policy Council at least annually? If so, note which areas have approved implementation plans.

PDM5.1

- ▶ If the program operates a combination option, does it provide an acceptable combination of minimum number of class sessions and home visits over a period of 8 months to 12 months?

PDM5.4

- ▶ If the program operates a home-based option, does it provide 1 home visit per week per family (a minimum of 32 home visits per year), lasting a minimum of 1½ hours each, as well as provide 2 group socialization activities per month for each child (a minimum of 16 group socialization activities per year)?

PDM5.4

Applies To: Home-based programs

- ▶ If the program operates a home-based option for Early Head Start, does it provide the required minimum weekly home visits (average of 90 minutes each in most cases) and monthly group socializations for the number of weeks of operation as approved in the grant?

PDM5.4

Applies To: Home-based programs serving infants and toddlers

- ▶ If the program operates a center-based program, does it ensure that it provides the required number of hours or days of operation?

PDM5.4

Applies To: Center-based programs

- ▶ If the program operates an alternate program variation, can it demonstrate ACF approval?

PDM5.4

- ▶ If the program operates a family child care option, does it operate a sufficient number of hours to meet the child care needs of the families?

PDM5.4

Applies To: Family child care programs

- ▶ Review the long and short term goals and objectives the program intends to achieve and the strategies that the program plans to use to accomplish them. Can you link these goals to either Community Assessment or Self Assessment information? Summarize or list a sample of goals that result from Self Assessment information, (including ongoing monitoring) and Community Assessment data as applicable.

PDM5.4



Summary Analysis: Program Planning

► Summarize whether the program has a systematic, ongoing program planning process that uses data from the community assessment, Self-Assessment and child outcomes data. Clearly describe the planning system and any strengths or weaknesses that were discovered in the system during the review. Collaborate with other team members to fully understand how the program develops plans, including the types of options that would best serve children in your service area, and follows-up on their plans and goals.

Review the following information:

- Planning summaries provided by reviewers for each service area;
- Responses to interviews conducted by service area reviewers that focus on how program staff incorporate information from the Community Assessment into program planning and implementation
- Responses to interviews conducted by service area reviewers that focus on how program staff incorporate information from the Self-Assessment into program planning and implementation
- Your own analysis of the extent to which the program uses its Community Assessment and Self- Assessment for program planning, including updating the plans based on changing community needs and program options.
- Your responses to the previous program planning compliance indicators in this protocol section
- The Onsite Analysis Matrix which provides an overview of the program's planning system
- Responses to interviews with Head Start Director and Policy Council or Committee
- Information related to the use of Child Outcomes Data

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM5.1

PDM5.4

Interview: Head Start/Early Head Start Director (Community Assessment and Program Planning)

► Describe how the program develops its goals to respond to community needs, and then revises those goals as appropriate to respond to changes in the community.

PDM5.2

► Explain how the information contained in the Community Assessment is used in program planning and implementation, including selection of program options.

PDM5.3

PDM5.4

Interview: Head Start/Early Head Start Director and Policy Council or Policy Committee Member (Self Assessment and Program Planning)

► Describe your process and timeframe for conducting the annual Self Assessment. Who is involved in planning and conducting the self assessment and what is the role of the Board and Policy Council?

PDM5.2

Interview: Head Start/Early Head Start Director (Self Assessment and Program Planning)

► As a result of the Self Assessment, what actions are taken when instances of noncompliance with Federal requirements are discovered? How are plans for improvement developed?

PDM5.2



► Describe how the program reviews and revises its goals to address the outcomes of the annual Self Assessment. Can you share an example of changes to program goals based on the Self Assessment?

PDM5.2

► Can you show me a goal or several goals that are a result of the use of child outcomes information in the self assessment and are targeted toward improving school readiness?

PDM5.2

Pre-Site: Self Assessment and Program Planning

► List the dates of the last two Self Assessment reports.

PDM5.2

► Was the Self Assessment conducted with the consultation and participation of the Policy Council, Policy Committee (as applicable), and other community members (as appropriate)?

PDM5.2

► Has the program used its Self Assessment to determine regulatory compliance, program effectiveness and progress in meeting its goals?

PDM5.2

► Summarize the areas out of compliance and strengths the grantee identified in its most recent annual Self Assessment. In your summary:

- Summarize the Self Assessment's findings, including both areas out of compliance and strengths; and
- Describe whether the program has made corrections to address areas out of compliance that it identified in its Self Assessment.

PDM5.2

► Has the agency developed and submitted an improvement plan to the Office of Head Start, approved by the agency's governing body, designed to strengthen weaknesses identified through its Self Assessment?

PDM5.2

Pre-Site: Community Assessment

► After review of the Community Assessment, summarize the general make-up of the Head Start community the program serves. Note important demographic information that later will help you determine whether the grantee has used the Community Assessment to formulate long- and short-term goals, such as location of centers, types of services offered to parents, and with which community partners they collaborate.

PDM5.3

► List the date of the most recent Community Assessment.

PDM5.3

► List the date of the most recent update to the Community Assessment.

PDM5.3



Document Review: Regional Office Correspondence

► Service reviewer observations of program options were inconsistent with the program options described in the approved refunding application. Did the grantee obtain prior written approval from the Regional Office for the observed program options?

PDM5.4

Reviewed By: Fiscal

Document Review: Grant Application Budget Instrument (GABI)

► Are the program options described in the approved refunding application consistent with options observed by the service area reviewers?

PDM5.4

Reviewed By: Fiscal



Program Design and Management

Program Design and Management Compliance Framework #6 -Ongoing Monitoring

The program establishes and implements a process of ongoing monitoring of its operations and services that includes: (1) using measures, tools, or procedures to implement the system of ongoing monitoring; (2) assigning staff or consultants to the ongoing monitoring of each service; (3) collecting, analyzing and reporting on the program’s progress towards its own goals for quality; and (4) following-up on and correcting any weaknesses identified through the self assessment or findings identified through monitoring.

Compliance Indicators:

6.1 The program establishes and regularly implements a process of ongoing monitoring of its operations and services in order to ensure compliance, adherence to its own program procedures, and progress towards its own goals for quality.	1304.51(i)(2), 641(g)
6.2 The grantee establishes procedures and conducts an evaluation of their delegate agency (agencies) to ensure compliance and quality of program operations, informs the delegate(s) of the results and takes action to correct any deficiencies.	641(d)(1), 641(d)(2)(A), 641(d)(2)(B), 641(d)(3), 1304.51(i)(3)

Targeted Questions for Program Design and Management Compliance Framework #6 -Ongoing Monitoring

Interview: Head Start/Early Head Start Director (Ongoing Monitoring and Oversight)

- ▶ Describe your program’s system for monitoring the delivery of the program's services and the program's compliance with all Federal regulations. Walk me through how you use the monitoring system to ensure compliance and quality performance of the staff and the services.
PDM6.1
- ▶ Discuss the kinds of tools, tracking documents, reports, and other materials that are systematically used in implementing the ongoing monitoring of program services. How are you informed of areas of concern, strengths and ensured that follow-up has occurred in all areas of the program? Can you provide some examples? Reviewer’s written response must indicate:
 - How the program detect problems or weaknesses
 - How the program ensures that staff monitor the delivery of services effectively within their areas.
 PDM6.1
- ▶ How often and what process do you use to receive ongoing status reports that capture the program's progress in meeting its goals and objectives? How do you use the information from these reports to improve program quality and make necessary corrections?
PDM6.1



Pre-Site: Self Assessment and Program Planning

► Examine the program’s monitoring plan or procedures and describe the methodology for ongoing monitoring of program services (e.g., strategies for monitoring, tools used to monitor, timeframes and responsibilities of staff). Make notes of what areas are monitored. How is follow-up reflected?

PDM6.1

► Review and describe the procedures that the grantee has established to evaluate the compliance and quality of their delegate agency’s operations. Do procedures address:

- Evaluation methods?
- Procedures for defunding the delegate agency?
- Procedures for delegate agency appeal process?
- How delegate(s) are informed of any deficiencies identified that need to be corrected?
- Actions that the grantee may take to remedy corrective actions?

PDM6.2

Applies To: Grantees with delegates

Summary Analysis: Ongoing Monitoring

► Summarize how the program has established and implemented procedures for ongoing monitoring. Review the following information, as well as additional information you find relevant to addressing this compliance indicator:

- Ongoing monitoring summary analyses provided by reviewers for each service area. You also can examine reviewer responses to each service area’s interview review questions for ongoing monitoring. This information contributed to each service area summary analysis; however, reviewing the detailed responses might be useful to you.
- Information gleaned through your interview with the Head Start or Early Head Start Director.
- Your review of the Onsite Analysis Matrix to analyze whether strengths or concerns identified within a single service area or across service areas reflect a strength or weakness in the program’s ongoing monitoring process. Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM6.1

Document Review: PDM Policies and Procedures

► Review the program's policies and procedures for the various service areas. Describe whether EHS is integrated into these policies and procedures.

PDM6.1

Interview: Head Start/Early Head Start Director (Ongoing Monitoring-Delegates)

► Does the grantee inform delegate governing bodies promptly of deficiencies identified in monitoring review? If deficiencies are identified, describe the process for how the grantee works with the delegate(s) to set priorities and establish schedules for addressing those areas of deficiency in delegate operations.

PDM6.2

Applies To: Grantees with delegates



► Describe the procedures that the grantee has established for evaluating the delegate agency (agencies). How often does the grantee monitor delegate operations and how does this occur? Who is responsible for determining if deficiencies occur and monitor that corrections are made? If deficiencies are not corrected, what procedures are in place to ensure correction?

PDM6.2

Applies To: Grantees with delegates



Program Design and Management

Program Design and Management Compliance Framework #7 -Record Keeping

The program establishes and maintains record keeping systems that are accurate, effective and safeguard client privacy and that assure appropriate individualization of program activities, document the delivery of quality services and ensure compliance with federal (and other jurisdiction) regulations.

Compliance Indicators:

7.1 The program establishes and maintains a record-keeping system that provides accurate and timely information regarding children, families, and staff and ensures appropriate confidentiality of this information.

1304.51(g)

Targeted Questions for Program Design and Management Compliance Framework #7 -Record Keeping

Interview: Head Start/Early Head Start Director (Record-Keeping)

► What system does your program use to ensure that your program’s records are timely, up to date, and accurate? In your response please also describe:

- What you do if you discover that records are not accurate, incomplete or missing; and
- Your system for auditing records such as child, family or staff files, including how and when this occurs.

PDM7.1

► Are provisions in place for reconstructing data files in case of catastrophe?

PDM7.1

Summary Analysis: Record-Keeping

► Summarize whether the program has an effective system that maintains up to date and accurate information on children, families and staff.

Review the following information, which will automatically populate under this compliance indicator:

- Record-keeping System summaries provided by reviewers for each service area; and
- Information gleaned through your interview with the Head Start Director.

Also review:

- The Onsite Analysis Matrix which provides an overview of the program’s staff-to-parent communication system; and
- Additional information you find relevant to addressing this compliance indicator.

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM7.1



Program Design and Management

Program Design and Management Compliance Framework #8 -Reporting

The program establishes and implements reporting systems that are accurate, efficient and meet required time schedules in order to inform effective planning and to assure the quality and timeliness of program services and compliance with federal (and other jurisdiction) regulations.

Compliance Indicators:

8.1 Periodic reports of financial status and program operations are provided to program governing bodies, policy groups, and staff to advise them in planning and decision making, to monitor program quality and to maintain program accountability.	1304.51(h)(1)
8.2 The program publishes and makes available to the public an annual report.	644(a)(2)

Targeted Questions for Program Design and Management Compliance Framework #8 -Reporting

Interview: Head Start/Early Head Start Director (Reporting)

► What financial and programmatic reports do you receive? How often do you receive the reports and how do you use them?

PDM8.1
FIS2B

► What information do the reports you receive include? Discuss your review of copies of reports received by the Head Start director. Are they clear and comprehensive? Are they received on a consistent basis? Do they contain information that assists the director, in monitoring program quality and compliance?

PDM8.1
FIS2B

► What other reports do you receive? How do the reports you receive help you keep track of the program's performance and progress towards program goals?

PDM8.1
FIS2B

► When do you publish an annual report available to the public? How is the report developed and made available to the public (your community)?

PDM8.2

Summary Analysis: Reporting

► Summarize whether the program has an effective system for reporting on its program operations and financial status.

Review:

- The Onsite Analysis Matrix which provides an overview of the program’s reporting system; and
- Any additional information you find relevant to addressing this compliance indicator.

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM8.1



Document Review: Director Reports

► Review staff management team/coordinator reports that are submitted to the Head Start/Early Head Start Director on a regular basis. Do these reports contain information that assists the Director in monitoring and obtaining information of key areas of services to children and families? Are they submitted with enough regularity to assure that the director is obtaining adequate information on the timeliness, compliance and quality of services and any problems that exist?

PDM8.1

Document Review: Annual Report to the Public

► Does the grantee develop and make available an annual report to the public?

PDM8.2



Program Design and Management

Program Design and Management Compliance Framework #9 -Communication

The program develops a system for ongoing communication that ensures an optimum exchange of information to and from staff, parents, community members, governance groups, and delegates through a system of ongoing communication which offers maximum transparency, supports efficiency of program operations, and promotes involvement in decision making.

Compliance Indicators:

9.1 The program has mechanisms for regular communication among all program staff to facilitate high-quality outcomes for children and families.	1304.51(e)
9.2 Effective two-way communication between staff , parents and families is carried out regularly throughout the Head Start program year, including communication with parents who speak a language other than English.	1304.51(c)(1), 1304.51(c)(2)
9.3 The communication system supports effective decision making among staff, policy council and the Board of Directors.	1304.51(d)(1), 1304.51(d)(2), 1304.51(d)(3), 1304.51(d)(4)
9.4 Communication between grantee and delegate agencies ensures timely transfer of pertinent information including correspondence, regulations and policies from funding agencies.	1304.51(f)

Targeted Questions for Program Design and Management Compliance Framework #9 -Communication

Interview: Head Start/Early Head Start Director (Communication)

- ▶ How do staff share information across service areas to ensure that the program effectively meets children’s needs?
PDM9.1
- ▶ How do you communicate policy or operational changes made by the Board, Policy Council, and staff to all staff and parents? Give specific examples.
PDM9.1
PDM9.2
- ▶ Describe the program’s system of communication between Governing Body and Policy Council Groups? What is your role in ensuring this communication is timely, accurate and supports optimum decision making?
PDM9.3
- ▶ What procedures are in place to ensure that delegate agency staff, governing bodies and policy groups are provided with regulations, policies, and other pertinent communications in a timely manner? Can you show me these procedures and samples of communications?
PDM9.4



Interview: FCP Coordinator (Communication)

► Describe the system of communication between classroom staff and family services staff. What strategies are in place to ensure that classroom needs of children are shared with family services staff and families?

PDM9.1

PDM9.2

Asked By: ISR I

► What is the process used to communicate information given to you by parents and family members to appropriate family services or other staff persons who need to be aware of this information? How do you document this communication?

PDM9.1

Asked By: ISR I

► Describe the various ways that the program communicates in an ongoing way with parents and families, both verbally and in print. Can you show me examples or documentation of some of the ways you communicate with parents (e.g., newsletters, phone contact logs, parent flyers, reports to parent meetings, etc.)? Describe how communication would occur if the parent or family members spoke a language other than English.

PDM9.2

Asked By: ISR I

Interview: Teacher (Communication)

► How do you learn about policy changes or changes in the operations of the program?

PDM9.1

Asked By: ECD

Interview: ECD Coordinator (Staff Coordination)

► How do teachers communicate with other service area staff to ensure children's needs are met in the classroom? How do you know that your teachers and other staff have effectively communicated with each and that children's needs have been met?

PDM9.1

Asked By: ECD

Summary Analysis: Communication

► Summarize whether the program has established effective communications:

- Between program staff in different service areas
- Between program staff and parents/families.

Review the following information:

- Staff and parent/family communication summaries provided by reviewers for each service area; and
- Responses to interview questions regarding communication systems from various service areas.

Also review the:

- The Onsite Analysis Matrix which provides an overview of the program's staff-to-staff communication system; and
- Additional information you find relevant to addressing this compliance indicator.

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM9.1

PDM9.2



Interview: Parent (Parent Involvement)

► Do the Head Start/Early Head Start program staff communicate with you throughout the year? In what ways?

PDM9.2

Asked By: ISR I

► How are you made aware of information about what is happening in your child's classroom? About what is happening at Policy Council? About program activities for your family or your child? If you want information about what is happening in the program who would you contact?

PDM9.2

Asked By: ISR I

► Are you aware of how the program tries to communicate with families that speak a language other than English?

PDM9.2

Asked By: ISR I

Interview: Governing Body Members and Policy Council or Policy Committee Member (Communication)

► Describe how you obtain timely and accurate information to assist in your decision making, including:

- Communications from the Office of Head Start
- Program planning information
- Program and financial reports
- Program plans, polices, procedures and grant applications

PDM9.3



Program Design and Management

Program Design and Management Compliance Framework #10 -Human Resources: Staffing and Structure

The program maintains a well developed organizational structure of qualified staff to plan, implement, and manage program services and ensure attainment of the program’s mission and goals.

Compliance Indicators:

10.1 The program establishes an organizational structure that provides for adequate supervision and supports the required program management functions to ensure the accomplishment of program goals and objectives.	1304.52(a)(1), 1304.52(a)(2)
10.2 The program hires staff or consultants who meet the required qualifications, knowledge, skills and experience needed to responsibly perform their assigned job duties.	1304.52(b)(1), 1304.52(b)(2)
10.3 The Head Start Director or Early Head Start Director is qualified for the position through demonstrated skills and abilities relevant to human services program management.	1304.52(c)

Targeted Questions for Program Design and Management Compliance Framework #10 -Human Resources: Staffing and Structure

Interview: Head Start/Early Head Start Director (Organizational Structure)

► How does the program's staffing and structure affect the program’s ability to meet its objectives? Are there vacancies that affect the program’s ability to meet its objectives?

PDM10.1

Pre-Site: Organizational Chart

► Does the organizational chart include the required management functions? Document which staff people are formally assigned to and have adopted the required functions.

- Program management (Head Start Director or Early Head Start Director)
- Child development and education
- Child medical and dental
- Child mental health
- Child nutrition
- Services for children with disabilities
- Management of family and community partnerships, including parent engagement activities

PDM10.1

► Does the organizational structure provide for a separation of executive responsibilities from fiscal management? Do fiscal staff have potentially conflicting roles in managing operations outside the fiscal area? Does the organizational chart for the fiscal area reveal potential weaknesses in segregation of duties?

PDM10.1



Summary Analysis: Staff Qualifications and Expertise

- ▶ Summarize how well the program hired staff or consultants who meet the required qualifications to provide ongoing content area expertise and systematic oversight.

Describe the ability of the program to meet its goals with the staff composition in place. Detail vacancies and their effect on the program to provide services and indicate any concerns that were identified in the classrooms due to unqualified teachers. Review the human resource summaries provided by other reviewers and indicate whether there are any patterns in staffing that are of note.

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM10.2

Pre-Site: Regional Office Fiscal Form

- ▶ Were any Regional Office concerns expressed in connection with approval of key personnel?

PDM10.2

Reviewed By: Fiscal

- ▶ If yes, describe the concern and any onsite follow-up expected by the Regional Office in connection with approval of key personnel.

PDM10.2

Reviewed By: Fiscal

Observation: Fiscal Observations

- ▶ Conduct follow up (document review, interview, etc) to respond to the concerns in connection with in connection with approval of key personnel raised by the Regional Office. Record your answer in detail, and provide details on any documents that were provided in response to your question.

PDM10.2

Observed By: Fiscal

Document Review: Grant Application Budget Instrument (GABI)

- ▶ Review the grant application for the current award period, the organizational chart and relevant RO correspondence. For key personnel, did the Regional Office approve the hiring? Are any key personnel different than those reflected on the grant application? If so, was Regional Office approval obtained for individuals hired in these key positions?

PDM10.2

FIS1B

Reviewed By: Fiscal



Staff Files: Head Start/Early Head Start Director (Staff Qualifications and Expertise)

- ▶ Review the Head Start Director or Early Head Start Director's staff file. Summarize the Director's training, experience, and qualifications.

PDM10.3

Interview: Head Start/Early Head Start Director (Staff Qualifications and Expertise)

- ▶ Describe the qualifications, skills and experience you bring to the position of Head Start/Early Head Start Director that enable you to effectively manage the program. If a concern was identified during the review of the Head Start or Early Head Start Director's file, ask the Director to address the concern and to describe the qualifications, training, or experience that qualify the Director to direct the program?

PDM10.3



Program Design and Management

Program Design and Management Compliance Framework #11 -Human Resources: Developing and Implementing Personnel Policies

The program develops, maintains and implements effective personnel policies, including Standards of Conduct, that establish guidelines and procedures for hiring, selecting and terminating staff, and defining policies under which employees are expected to function.

Compliance Indicators:

11.1 The program develops and implements written personnel policies for staff (including Standards of Conduct and procedures), that are approved by the Governing Board and Policy Council and are available to all staff.

1301.31(a),
1301.31(a)(2),
1301.31(a)(3),
1301.31(a)(5),
1304.50(d)(1)(ix),
1304.52(i)(1),
1304.52(i)(1)(i),
1304.52(i)(1)(ii),
1304.52(i)(1)(iii),
1304.52(i)(1)(iv),
1304.52(i)(3)

11.2 The program assures that each staff member completes an initial health examination (including screening for tuberculosis) and periodic reexaminations (as recommended by his or her health care provider or as mandated by State, local, or Tribal laws)?

1310.16(b)(3),
1304.52(k)(1)

11.3 Prior to employing an individual, the program obtains:

- Federal, State, or Tribal criminal record check covering all jurisdictions where the grantee provides Head Start services to children;
- Federal, State, or Tribal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services; or
- Criminal record check as otherwise required by Federal law

648A(g)(3)(A),
648A(g)(3)(B),
648A(g)(3)(C),
1301.31(b)(1)(iii),
1310.16(b)

Note: The Head Start Act, enacted December 12, 2007, requires that background check must be completed on all employees before they are hired. Accordingly, the following guidelines apply for reviewing the completion of background check: • For employees hired before December 12, 2007: The program is required to conduct the background check before an employee is made permanent, in accordance with 1301.31(b)(1)(iii). • For employees hired on or after December 12, 2007: The program is required to conduct a background check before all staff are hired, including transportation staff, in accordance with 648(g)(3).



Targeted Questions for Program Design and Management Compliance Framework #11 -Human Resources: Developing and Implementing Personnel Policies

Observation: Health and Safety Family Child Care Observations and Health and Safety Center-based Observations

► Observe classroom or family child care settings to determine whether there are any violations of the following Standards of Conduct:

- If any child is left alone or unsupervised while under the care of Head Start or Early Head Start staff
- If food is used as a punishment or reward
- If there were any observable uses of corporal punishment, emotional or physical abuse or humiliation to children by Head Start or Early Head Start staff

PDM11.1

Observed By: ISR II

Interview: Head Start/Early Head Start Director (Code of Conduct)

► How are Standards of Conduct violations reported? How do your personnel policies address how to handle violations in the Standards of Conduct?

PDM11.1

Document Review: Standards of Conduct

► Do the program's Standards of Conduct ensure that all staff abide by established standards? Do the standards of conduct include all elements specified in 1304.52(i)(1)(i); 1304.52(i)(1)(ii); 1304.52(i)(1)(iii); and 1304.52(i)(1)(iv)?

PDM11.1

► Does the code of conduct address consequences for violations of these standards?

PDM11.1

Summary Analysis: Personnel Policies

► Based on your findings, summarize the system the program has developed to establish and approve guidelines, policies and procedures under which employees are expected to function, including standards of conduct and procedures for hiring, selecting and terminating staff. Do policies describe actions the program may take if employed staff do not follow approved guidelines? Does the system include the methods used by the program to ensure all staff have access to policies?

Describe the ability of the program to establish and implement personnel policies that adhere to all federal, state and local regulations.

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM11.1



Staff Files: Nutrition Coordinator, Health Coordinator, Mental Health Coordinator, Disabilities Coordinator, FCP Coordinator, FCP Staff, Parent Involvement Coordinator, Facilities Coordinator, ECD Coordinator, Preschool Teacher, Infant and Toddler Teacher, Family Child Care Provider, Home Visitor, Transportation Coordinator, ERSEA Coordinator and Head Start/Early Head Start Director (Staff Hiring Procedures)

► Review staff files for documentation of initial health examination (including screening for tuberculosis) and reexamination (if required by health care provider or as mandated by State, local or Tribal laws).

- Document the date of the initial health exam and screening.
- Is a reexamination required?
- How often is a reexamination required?
- Has the reexamination been completed?
- Document the date of the most recent reexamination, if required.
- Has the tuberculosis screening been completed?
- Document the date the last or most current tuberculosis screening was completed.

PDM11.2

Staff Files: Bus Driver (Staff Hiring Procedures)

► Is there documentation of medical examination prior to beginning work, establishing that the bus driver possesses the physical ability to perform job-related functions with any necessary accommodations?

- Document the date of the most recent medical examination.
- Did the physician establish that the individual could perform the requirements of the job, with any necessary accommodations?

PDM11.2

1310.16(b)(3)



Staff Files: Nutrition Coordinator, Health Coordinator, Mental Health Coordinator, Disabilities Coordinator, FCP Coordinator, FCP Staff, Parent Involvement Coordinator, Facilities Coordinator, ECD Coordinator, Preschool Teacher, Infant and Toddler Teacher, Family Child Care Provider, Home Visitor, Transportation Coordinator, Bus Driver, ERSEA Coordinator and Head Start/Early Head Start Director (Staff Hiring Procedures)

- ▶ Was a criminal background check conducted prior to employment?
 - If yes, indicate the date the criminal background check was conducted.
 - Does the date the criminal background check was conducted comply with federal and state regulations?
 - If no criminal background check was conducted, does this staff member provide direct services to children?
 - If they do not provide direct services to children, indicate whether the staff member has an office in a center serving children or in an administrative building where there are no children present.

PDM11.3

Interview: Head Start/Early Head Start Director (Background Checks)

- ▶ What is the process for obtaining the appropriate criminal record checks before hiring an employee?
 - ▶ If any staff members were identified as not having a criminal record checks (CRC), discuss this issue with the Director. Tell the Director which staff members did not have CRC(s) on file. Ask the Director: Can you explain why these staff do not have CRCs? What is the state requirement regarding CRCs? How do you know when staff are not required to have CRCs?

PDM11.3

Document Review: Staff List of Criminal Record Checks

- ▶ Obtain a list from the grantee that indicates the date a criminal record check was performed for each hired staff member. From the list, draw a sample of staff records for teacher aides, kitchen staff, facilities staff and bus monitors. Compare the dates on the grantee's list to information found in each staff file. Were the criminal record check dates on the grantee's list accurate?

PDM11.3



Program Design and Management

Program Design and Management Compliance Framework #12-Human Resources: Training and Professional Development

The program has a system for staff orientation, supervision, evaluation and training that supports optimum staff performance and ensures professional development of all staff in a process of continuous learning.

Compliance Indicators:

12.1 The program conducts annual performance reviews of all staff and results are used to plan for training and staff development. Note: 1310.17(f)(1) applies only to transportation staff.	1304.52(j), 1310.17(f)(1)
12.2 The program ensures that all full-time Head Start employees who provide direct services to children have a professional development plan that is evaluated regularly to assess its impact on teacher and staff effectiveness?	648A(f)
12.3 The program provides opportunities for orientation, ongoing training and development for all staff that increase competency needed to fulfill their job responsibilities and give staff the knowledge and skills to implement the content of the Head Start Performance Standards and the Head Start Act.	1304.52(l)(1), 1304.52(l)(2), 1304.52(l)(3), 1304.52(l)(5), 648A(a)(5)
12.4 The program establishes staff training that includes processes and procedures that comply with applicable State and local laws for identifying and reporting child abuse and neglect?	1304.52(l)(3)(i)

Targeted Questions for Program Design and Management Compliance Framework #12-Human Resources: Training and Professional Development

Staff Files: Nutrition Coordinator, Facilities Coordinator, Health Coordinator, Mental Health Coordinator, Head Start/Early Head Start Director, Fiscal Officer, ECD Coordinator, Preschool Teacher, Infant and Toddler Teacher, Family Child Care Provider, Home Visitor, Transportation Coordinator, Disabilities Coordinator, FCP Coordinator, FCP Staff and ERSEA Coordinator (Staff Training and Development)

► Indicate the date of the most recent performance review.

PDM12.1
1304.52(j)

Document Review: Performance Appraisal Policy

► Do program policies require annual performance reviews of each Head Start and Early Head Start staff member which are used to identify staff training and professional development needs and assist each staff member in improving their skills and competencies?

PDM12.1



Interview: Teacher, Family Child Care Provider, ECD Coordinator, Fiscal Officer, Facilities Coordinator, Health Coordinator, Nutrition Coordinator, Transportation Coordinator, FCP Staff, FCP Coordinator, Disabilities Coordinator, Mental Health Coordinator, Head Start/Early Head Start Director, ERSEA Coordinator and Home Visitor (Performance Appraisals)

- ▶ When did you receive your last annual performance appraisal? Who conducted the appraisal?

PDM12.1

Asked By: ECD, Fiscal, ISR II, ISR I and PDM

- ▶ How are the results of your annual performance appraisal used? Do they help you identify your training and professional development needs? How does your manager help you improve skills and professional competencies?

PDM12.1

Asked By: ECD, Fiscal, ISR II, ISR I and PDM

Interview: Head Start/Early Head Start Director (Performance Appraisals)

- ▶ Describe the annual performance appraisal process and timeframe. Who conducts appraisals? Who is responsible for ensuring that all staff are evaluated annually? How are appraisals used to determine staff training opportunities and improving staff skills and competencies?

PDM12.1

Interview: Bus Driver (Performance Appraisals)

- ▶ Do you receive an annual evaluation that includes an onboard observation? When was your last evaluation and who conducted it?

PDM12.1

TRANS3B

Applies To: Programs that provide transportation services

Asked By: ISR II

Interview: ECD Coordinator, Fiscal Officer, Facilities Coordinator, Health Coordinator, Nutrition Coordinator, Transportation Coordinator, FCP Staff, FCP Coordinator, Disabilities Coordinator, Mental Health Coordinator, Parent Involvement Coordinator, ERSEA Coordinator, Head Start/Early Head Start Director, Home Visitor, Teacher and Family Child Care Provider (Training)

- ▶ Describe the opportunities for ongoing training that the program provides you to help you acquire and maintain the skills and knowledge necessary to fulfill your job responsibilities and to implement Head Start Program Performance Standards in the service area. What recent opportunity do you think most impacted your competency in your job?

PDM12.1

Asked By: ECD, Fiscal, ISR II, ISR I and PDM

Staff Files: Preschool Teacher, Family Child Care Provider, ECD Coordinator, Infant and Toddler Teacher, Home Visitor, Nutrition Coordinator, Health Coordinator, Facilities Coordinator, Mental Health Coordinator, Head Start/Early Head Start Director, Transportation Coordinator, Disabilities Coordinator, FCP Coordinator, FCP Staff, ERSEA Coordinator and Parent Involvement Coordinator (Staff Training and Development)

- ▶ Indicate the date of the most recent staff professional development plan.

PDM12.2



Interview: Teacher, Family Child Care Provider, Home Visitor, Mental Health Coordinator, Disabilities Coordinator, FCP Staff, FCP Coordinator, Parent Involvement Coordinator, Facilities Coordinator, Transportation Coordinator, Nutrition Coordinator, Health Coordinator, ECD Coordinator, Head Start/Early Head Start Director and ERSEA Coordinator (Professional Development Plans)

► How did you participate in the development of your professional development plan? How often do you help evaluate the impact of the plan on your effectiveness in doing your job? How do you update your plan?

PDM12.2

Asked By: ECD, ISR I, ISR II and PDM

Interview: Head Start/Early Head Start Director and ECD Coordinator (Professional Development Plans)

► Can you describe the process for designing and implementing professional development plans for all fulltime staff who provide direct services to children? How and how often are the plans evaluated to assess their impact on teacher effectiveness? Provide examples of the impact that the professional development plan has had on some of the teachers or staff members.

PDM12.2

Asked By: PDM and ECD

Interview: ECD Coordinator (Training)

► How does the program ensure that each Head Start teacher attends at least 15 hours of classroom-focused professional development each year? How do you determine the focus of these opportunities?

PDM12.2

Asked By: ECD

► How does the program offer family child care providers opportunities for training in the following areas:

- Infant, toddler, and preschool development;
- Curriculum implementation;
- Skills for working with children with disabilities;
- Effective communication with children and their families;
- Safety, sanitation, hygiene, health practices, and certification in infant and child CPR;
- USDA and Child and Adult Care Food Program regulations; and
- Other skills necessary to increase their knowledge of children and family services?

PDM12.3

Applies To: Family child care programs

Asked By: ECD



Staff Files: Health Coordinator, Nutrition Coordinator, Transportation Coordinator, Facilities Coordinator, Disabilities Coordinator, FCP Coordinator, Mental Health Coordinator, Preschool Teacher, Infant and Toddler Teacher, Family Child Care Provider, Home Visitor, Head Start/Early Head Start Director, ERSEA Coordinator, Fiscal Officer, FCP Staff and ECD Coordinator (Staff Training and Development)

► Review staff files or training records for evidence of training opportunities attended by staff and volunteers. Briefly summarize the types of training offered.

PDM12.3

Interview: Teacher, Family Child Care Provider and Home Visitor (Staff Training and Development)

► Briefly describe the types of training provided for teachers which includes 15 hours of classroom-focused professional development each year.

PDM12.3

Asked By: ECD

► How are you trained to implement the program's chosen curriculum?

PDM12.3

Asked By: ECD

Staff Files: Preschool Teacher, Infant and Toddler Teacher and Family Child Care Provider (Staff Training and Development)

► Does the training provided for teachers include 15 hours of classroom-focused professional development each year?

PDM12.3

Document Review: Training Plans and Policies

► Does the program have training plans or other structured approach to providing staff orientation for all new staff and training and development to assist staff in increasing their competencies in fulfilling their job responsibilities and implementing the content of the Head Start Program Performance Standards? Review the plans or documents and summarize training opportunities. Indicate where academic credits are attached to opportunities.

PDM12.3

► Review the programs training plans, procedures and documentation of attendance.

- Does the program's annual staff training and development plan include review of and training on the program's procedures on identifying and reporting child abuse and neglect? Make note of date(s) of training.
- Does the program address applicable State, local, or Tribal laws for identifying and reporting child abuse and neglect in its training plans and policies? Review agendas for validation that applicable laws were discussed.
- Does review of the attendance roster show that all staff were offered this training? Review sign-in sheets (attendance roster) to determine if names and positions of staff attending training are documented.

PDM12.4



Summary Analysis: Training and Professional Development

► Based on your review of the evidence collected from service area reviewers, does the program have a structured approach (such as written Staff Orientation and Training Plans and Procedures, Performance Appraisal Professional Development Goals, Staff Development Plans, Staff Training Records, etc.) to providing staff orientation for all new staff and training and development to assist staff in increasing their competencies in fulfilling their job responsibilities and implementing the content of the Head Start Program Performance Standards?

Describe the ability of the program to ensure that staff meet or exceed qualifications, increase their skills and competency and meet their individual professional development goals. Review the Human Resource summaries provided by other reviewers and indicate whether there are any patterns in increased or diminished staff training opportunities that are of note.

Clearly describe strengths, concerns, and the general level of performance in this area. Ensure that OHS and the grantee can glean from your summary a description of the system and its effectiveness.

PDM12.3

Interview: ECD Coordinator, Disabilities Coordinator, FCP Coordinator and Health Coordinator (Training)

► What training opportunities have been available over the past year? How do you determine what kind of training individual teachers, teacher assistants, family partnerships staff, health staff and home visitors need?

PDM12.3

Asked By: ECD, ISR I and ISR II

Interview: Head Start/Early Head Start Director (Training)

► Describe the program's structured approach and plans for providing orientation to new staff and ongoing training and professional development opportunities for all staff to ensure growth in competency and skills necessary to implement the Head Start Performance Standards. How do you assure your own professional development?

PDM12.3

Interview: Bus Driver, Bus Monitor, Teacher, Family Child Care Provider, ECD Coordinator, Facilities Coordinator, Health Coordinator, Nutrition Coordinator, Transportation Coordinator, FCP Staff, FCP Coordinator, Disabilities Coordinator, Mental Health Coordinator, Parent Involvement Coordinator, Head Start/Early Head Start Director, ERSEA Coordinator and Home Visitor (Training)

► When did you receive training on identifying and reporting child abuse and neglect? What steps would you take if you suspected child abuse or neglect? Can you show me your training file that documents your attendance at this training?

PDM12.4

Asked By: ISR II, ECD, ISR I and PDM



Program Design and Management

Program Design and Management Compliance Framework #13 - Program Strengths

Compliance Indicators:

13.1 Describe one or more program strengths.

The PDM Reviewer is responsible for capturing information about potential strengths from the grantee, regional office, and the review team by creating a finding under PDM 13.1 (i.e., answer the compliance indicator PDM13.1 as "YES"). All reports should have a potential area of strength identified. Please note that verification of a strength does not require two modes of inquiry or evidence.

Strength

Targeted Questions for Program Design and Management Compliance Framework #13-Program Strengths

Interview: Head Start/Early Head Start Director (Program Strengths)

- ▶ Describe your programs' strengths, such as a new or innovative practice that has a positive impact; a practice that overcomes challenges and provides greater or improved quality of service; or a practice that surpasses established performance indicators.

PDM13.1

Summary Analysis: Program Strengths

- ▶ Describe one or more program strengths. Review the following information, as well as additional information you find relevant to addressing this compliance indicator:
 - All summary analyses completed throughout the review
 - Any strengths identified by the Head Start or Early Head Start Director
 - During the Wednesday team meeting, collaborate with all reviewers to identify grantee strengths
 - Note that the Onsite Analysis Matrix may be useful as an overview of potential strengths identified during the review

Describe any practices that were found that were new or innovative and had a positive impact; that helped the grantee overcome challenges and provided greater or improved service quality; or surpasses established performance indicators.

PDM13.1



Introduction: Eligibility, Recruitment, Selection, Enrollment, and Attendance

The Eligibility, Recruitment, Selection, Enrollment, and Attendance processes are critical to determining those children who qualify for Head Start services and justifying how the program spends Head Start grant dollars. Head Start's goal in this area is for programs to have systems in place to identify children and pregnant women (EHS only) who qualify for Head Start services, confirm their qualifications, and, once selected and enrolled, track and monitor participation in program services. In order to assess compliance in this area, reviewers should be prepared to conduct a comprehensive analysis of the program's ERSEA policies and procedures and assess the level of implementation throughout the program, including the level of staff training and development in this area.

The **ERSEA** section of the Protocol is divided four (4) subsections with Compliance Indicators for each subsection:

- Eligibility and Enrollment
- Attendance and Participation
- Program Options
- Management Systems Analyses



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 1A

APPLIES ONLY TO: Programs serving preschool-age children

Has the program enrolled children who were younger than 3 years of age at the time of their enrollment or did not meet the eligibility requirements determined by the local school district?

Note: For all Head Start programs, if a vacancy opens during the program year, it may be filled by a 3-year-old who is otherwise eligible. Children in Migrant and Seasonal programs are eligible from birth to the child's entry into kindergarten.

Children may be enrolled at any time after their third birthday or before their 3rd birthday if they meet the eligibility requirements of the local school district.

1305.4(a)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 1A

Child Files: [Age/Income Eligibility Review Form](#)

- ▶ Refer to the results summarized from the Age/Income Eligibility Review. The summary will include the number of files reviewed and the number and percentage of children the Head Start program serves who are not at least 3 years old by the date used to determine eligibility for public school in the community where the program is located or who were not 3 year old by their date of entry into the program.



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 1B

Have program staff verified each child's eligibility and included in each file a statement signed by a program employee identifying the child's eligibility category and the documents examined to determine eligibility?

1305.4(c), 1305.4(d),
1305.4(e)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 1B

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ What is the program's system for ensuring that staff follow federal enrollment and eligibility requirements?
- ▶ How is eligibility determined?
- ▶ Describe the types of documentation you examine to determine a child's eligibility.
- ▶ How do you determine and document eligibility for families who report zero income or who have self-declared income?

Interview: Parent (Enrollment and Recruitment)

- ▶ Describe the process the program used to enroll your child.
Asked By: ISR I
- ▶ What documentation were you asked to provide at the time of enrollment?
Asked By: ISR I

Child Files: Age/Income Eligibility Review Form

- ▶ Is there a signed statement in the child's file indicating that the child is eligible to participate in the program that is signed by the appropriate Head Start employee?
- ▶ Does the statement indicate which documents were examined?
- ▶ Indicate the documents examined to determine eligibility (as detailed on the signed statement).
- ▶ If there is source documentation in the child file, please indicate the type(s) of documentation.



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 1C

DOES NOT APPLY TO: American Indian or Alaska Native grantees

Has the program enrolled children who are not categorically eligible or who fall outside of the defined income eligibility requirements stated below?

A child is categorically eligible to participate in the Head Start program if the:

- Child's family income is below the poverty line,
- Child's family is receiving public assistance (SSI and TANF),
- Child's family is homeless, or
- Child is a foster child.

Additional income eligibility requirements include the following:

- Ten percent of children enrolled in the program may be over income.
- An additional 35 percent of children who are not categorically eligible may be from families whose income is between 100 percent and 130 percent of poverty.

Note: Being a recipient of Food Stamps in and of itself does not make a child eligible for the Head Start program.

645(a)(1)(B)(iii)(I),
645(a)(1)(B)(iii)(II)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 1C

Child Files: Age/Income Eligibility Review Form

- ▶ In which income or eligibility category did the program enroll the child? Each child can only belong to one of the below categories:
 - Income is below poverty
 - Child is categorically eligible (e.g., Homeless, Foster Care, Public Assistance)
 - Income is between 100-130 percent of poverty
 - Over Income
 - The program has not indicated the child is categorically or income eligible

Document Review: Age/Income Eligibility Review Form

- ▶ Has the program enrolled children who are not categorically eligible or who fall outside of the defined income eligibility requirements? Refer to the results summarized from the Age/Income Eligibility Review. The summary will include information on the number and percent of children the program has determined to be in the categories of “income or categorically eligible” and “income ineligible.”
 - Were more than 10% of the child files reviewed in the “Over Income” category?
 - Were more than 45% of the child files reviewed in the “Income is between 100-130 percent of poverty” category?
 - Add the percent of children in the “Income is Below Poverty” category and the “Child is categorically eligible (e.g. Homeless, Foster Care, Public Assistance)” category. Does this add up to at least 55%?



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 2A

Has the program developed and implemented a process that is designed to actively recruit families with Head Start and/or Early Head Start eligible children, including children with disabilities, informing them of available services and encouraging them to apply for admission?

1305.5(a), 1308.5(b),
1308.5(c), 1308.5(f),
645A(c)(1)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 2A

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ Describe your recruitment process. When do you initiate recruitment activities?
- ▶ What are the systematic ways your program locates families eligible for your program’s services?
- ▶ How do you ensure the number of applications is greater than the number of available enrollment opportunities for the upcoming year?
- ▶ How do you locate and recruit pregnant women eligible for Early Head Start Services?

Interview: Parent (Enrollment and Recruitment)

- ▶ How did you find out about the Head Start/Early Head Start program? How did the program assist you in filling out your application and making sure all your information was accurate?
Asked By: ISR I

Interview: Disabilities Coordinator (Enrollment and Recruitment)

- ▶ Describe your program’s specific outreach activities to actively locate and recruit families of children with disabilities. How do you collaborate with your LEA or Part C Agency to locate children with severe disabilities or who have been previously identified as having disabilities?
Asked By: ISR I

Document Review: Recruitment Materials

- ▶ Review and summarize information contained in the recruitment materials about the program’s commitment to enrolling children with disabilities, including children with more significant disabilities.
Reviewed By: ISR I

Document Review: Enrollment and Recruitment Materials/Reports

- ▶ Review the program’s plans or procedures for recruitment. Identify strategies used by the program to solicit applications from as many Head Start/Early head start eligible families as possible within their service area. Describe recruitment timelines identified in the plans.
- ▶ Determine if the number of applications for the current program year is greater than the number of enrollment opportunities anticipated over the course of the upcoming enrollment year so that those children with greatest need for Head Start services may be selected.



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3A

Does the program have a systematic process for establishing selection criteria that is used for selecting children, that considers all eligible applicants for Head Start services?

1305.6(a), 1305.6(b),
1304.50(d)(1)(vii)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3A

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ Describe your process for developing and implementing your selection criteria. Who is involved in this process? When does it occur?

Document Review: Enrollment and Recruitment Materials/Reports

- ▶ Review the program’s formal process for selection of children. Is the process systematically applied for all children considered for enrollment?
- ▶ Examine the program’s selection criteria. Has the program developed written selection criteria that consider all eligible applicants? Does the program prioritize children from low income families and categorically eligible children prior to serving children whose family income falls above the poverty line?

ERSEA3B



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3B

DOES NOT APPLY TO: American Indian or Alaska Native grantees

If the agency serves children whose family income falls above the 100% of poverty line, has it established and implemented outreach and enrollment policies and procedures to first ensure it is meeting the needs of children who meet one of the following criteria?

- The child's family income is below the poverty line.
- The child's family is receiving public assistance.
- The child's family is homeless.
- The child is a foster child.

645(a)(1)(B)(iii)(II)(aa),
645(a)(1)(B)(iii)(II)(bb),
645(a)(1)(B)(iv),
645(a)(1)(B)(iii)(I)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3B

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ Describe the steps you take to ensure the program is meeting the needs of children below the poverty line, children eligible for public assistance, foster children, or homeless children, before enrolling other children (e.g., children with incomes between 100-130% or over-income children).

Document Review: ERSEA Policies and Procedures

- ▶ Review available documentation of outreach and enrollment policies and procedures to determine whether outreach is occurring before enrolling children above the poverty line.

Document Review: Enrollment and Recruitment Materials/Reports

- ▶ Examine the program's selection criteria. Has the program developed written selection criteria that consider all eligible applicants? Does the program prioritize children from low income families and categorically eligible children prior to serving children whose family income falls above the poverty line?
ERSEA3A
- ▶ Review documentation showing how enrollment vacancies were filled. Note instances where children whose family income falls above the poverty line have been enrolled prior to categorically eligible or low income children. Inquire regarding circumstances that led to such enrollment (e.g., in cases where waiting lists are geographical, a child above the poverty line might be selected in one area while a low income child from another area is still on the waiting list).



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3C

APPLIES ONLY TO: American Indian or Alaska Native grantees enrolling more than 10 percent of over-income children

Do American Indian or Alaska Native grantees that enroll more than 10 percent of over-income children meet the requirements in 1305.4(b)(3)(i), 1305.4(b)(3)(ii) and 1305.4(b)(3)(iv)?

Note: Although American Indian and Alaska Native grantees may enroll up to 49 percent over-income children, they must meet certain conditions, including:

- *Serving all income-eligible children who wish to enroll living on the reservation,*
- *Serving all income-eligible children who wish to enroll native to the reservation but living in non-reservation areas, or*
- *Enrolling all non-American Indian income-eligible children whose families wish to enroll if the non-reservation area is not served by another Head Start (HS) program.*

1305.4(b)(3)(i),
1305.4(b)(3)(ii),
1305.4(b)(3)(iv)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3C

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ Can you walk me through the process you follow for enrolling over-income Native children?

Document Review: Age/Income Eligibility Review

- ▶ Review documents to confirm that the total enrollment of income-eligible children is at least 51 percent if the tribe meets the conditions in 1305.4(b)(3)(i) and 1305.4(b)(3)(ii).



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3D

Does actual program enrollment include at least 10 percent children with disabilities?

Note: Children who are receiving intervention services before an eligibility determination are considered eligible under 640(d)(2) of the Head Start Act.

640(d)(1), 1308.5(c)

When examining grantee enrollment, review the grantee’s actual enrollment at the time of the review. If a problem is identified at this time, review the grantee’s cumulative actual enrollment to determine whether the grantee has identified and enrolled children with disabilities who subsequently dropped out of the program. Additionally, Program Instruction ACF-PI-HS-09-04 should be considered. If 10 percent is not reached and it is not the mid-point of the school year, the enrollment at mid-point of previous year should be reviewed to determine if the 10 percent requirement was met.

This requirement does not apply to programs with a waiver approved by the Administration for Children and Families (ACF) for this requirement.

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3D

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ What percentage are children with disabilities of the program's actual enrollment?
- ▶ Can you give any examples of children with disabilities denied enrollment or transitioned to another program because your program was unable to provide an appropriate placement? If so, describe how you determined that a placement in your Head Start program would not be appropriate, even with modifications and collaborative efforts with the LEA or Part C agency?

Document Review: Enrollment and Recruitment Materials/Reports

- ▶ Does the actual enrollment figure include 10 percent children with disabilities? In your notes, include the program’s total enrollment and the number of children enrolled who have a disability. If the actual enrollment figure reflects fewer than 10 percent, does the grantee have a waiver?



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3E

Has the program enrolled 100% of its funded enrollment and maintained an active and ranked waiting list at all times with ongoing activities to identify underserved populations and outreach to the community to assure eligible children enter the program as vacancies occur?

642(g), 1305.6(d)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3E

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- ▶ Explain your program’s process for developing a waiting list. When is the waiting list developed? How is your program’s waiting list kept current at all times?
- ▶ How do you use your waiting list to ensure that children ranked according to your selection criteria enter the program as vacancies occur?
- ▶ Is the grantee at its full funded enrollment? If not, why not?

Document Review: Enrollment and Recruitment Materials/Reports

- ▶ Examine the program's active waiting list. Is the waiting list kept current at all times? Review documentation to determine if waiting list has been used to enroll children as vacancies occur.
- ▶ Review enrollment reports. Are the monthly enrollment data consistent with what has been submitted to the Regional Office? Do the reports demonstrate that the grantee has maintained funded enrollment and if not, do they report reason(s) for enrollment shortfalls? Describe how actual enrollment data align with the data submitted in monthly enrollment reports.

ERSEA3F



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3F

Does the program have documentation to support monthly enrollment data submitted to the Office of Head Start?

641A(h)(2)(A), 641A(h)(2)(B)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 3F

Document Review: Enrollment and Recruitment Materials/Reports

- ▶ Review enrollment reports. Are the monthly enrollment data consistent with what has been submitted to the Regional Office? Do the reports demonstrate that the grantee has maintained funded enrollment and if not, do they report reason(s) for enrollment shortfalls? Describe how actual enrollment data align with the data submitted in monthly enrollment reports.

ERSEA3E



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 4A

APPLIES ONLY TO: Center-based programs

When monthly average daily attendance in center-based programs falls below 85 percent, are the causes of absenteeism analyzed?

1305.8(a), 1305.8(b)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 4A

Interview: ERSEA Coordinator (Attendance)

- ▶ How do you document absenteeism? What do you do with the information? What process do you use to analyze absenteeism? How is it used to resolve absenteeism problems (if they exist)?

Interview: ERSEA Coordinator and FCP Coordinator (Attendance)

- ▶ Can you give specific examples of the kind of support that is given to families of children with attendance that falls below 85% due to unexcused or undocumented absences?

Asked By: PDM and ISR I

Document Review: Attendance Records

- ▶ Review daily attendance records to determine whether patterns of absence and causes of absenteeism are documented.
- ▶ Review documentation on a sample of children with 4 or more consecutive unexcused absences (e.g. attendance records, family files and contact logs, case management files, etc.). Confirm program efforts at supporting families of these children to attain regular attendance.



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 4B

Has the program ensured that no child's enrollment or participation in the Head Start program is contingent on payment of a fee?

State subsidies should not be used as a contingency for enrollment or attendance in the Head Start portion of the program.

1305.9

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Compliance Indicator 4B

Interview: Parent (Fees)

- ▶ Have you ever been required to pay Head Start in exchange for your child's participation in the program? For example, are you required to pay late fees, registration fees, or provide money for your child to attend field trips? If yes, describe the payment you have been asked to make.

Asked By: ISR I

Document Review: ERSEA Policies and Procedures

- ▶ Based on information collected during the parent Interview in this section, determine whether parents are required to pay fees. Verify that these fees are required with the fiscal reviewer. Work with the Fiscal Reviewer to collect documentation of the required payments and include them as part of your evidence.
- ▶ Review ERSEA policies and procedures to determine whether parents are required to pay any fees as a condition of the child's enrollment or participation.