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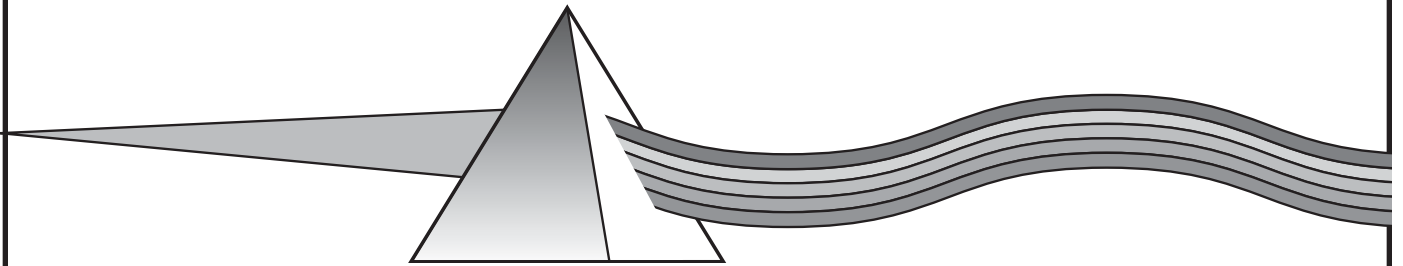
*Program Review Instrument for Systems Monitoring
of Head Start and Early Head Start Grantees*

PRISM Guide
2005

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What's New in the FY 2005 *PRISM Guide*

The Fiscal Year (FY) 2005 version of the *PRISM Guide (Guide)* expands on and updates the FY 2004 *PRISM Guide*. The *Guide* continues to address an audience that includes Federal Team Leaders (team leaders), reviewers, and grantees. While most language in the *Guide* is addressed to the team leader, the information provided is intended to benefit all audiences. In some instances, the language is addressed specifically to reviewers and grantees. Forms in the back of the *Guide* are labeled for their particular audience.

KEY CHANGES TO PRISM (FY 2005)

One of the major changes for FY 2005 is an increased emphasis on describing interrelated areas of noncompliance among services and systems. Interrelated areas of noncompliance may describe system-to-service interrelationships (i.e., a systems failure underlies a pervasive failure in service delivery) and system-to-system interrelationships (i.e., a systems failure underlies a pervasive failure in another system). Interrelationships are discussed throughout the *Guide*, and the section on developing the draft Head Start Review Report in the On-Site Activities chapter provides detailed direction on writing interrelated areas of noncompliance.

The Head Start Bureau (Bureau) continues its emphasis on improving fiscal monitoring. The Fiscal Checklist has been substantially revised for FY 2005 and uses a "risk-based" approach. Using this framework, the Fiscal Checklist now includes a set of prioritized indicators (i.e., "red flags") designed to identify underlying fiscal problems early. These indicators focus first on those areas that, if irregularities were present, would likely have the greatest adverse impact on the fiscal health of the grantee. In addition to the "red flag" indicators, the new Fiscal Checklist includes an updated list of questions that directly assess compliance with specific program requirements. Finally, the checklist assesses fiscal health in each of two major areas: internal controls and governance.

In addition, the Bureau is encouraging review teams to more closely examine several other areas during PRISM reviews. These include: transportation services; grantee compliance with other Federal, Tribal, State and local licensing requirements; and enrollment and income

eligibility. These areas will be described in more detail later in this section.

Also new for FY 2005, the Bureau is emphasizing the conduct of grantee self-assessments. Grantees are reminded that the conduct of self-assessments help to ensure delivery of high-quality services to children and their families, and assist the grantee (and its delegates, when applicable) in preparing for a Federal monitoring review.

REPORT WRITING AND COVER LETTER CHANGES

Report Writing Changes

In an effort to increase emphasis on the interrelatedness of systems, services, and partnerships, and improve the method for delivering review decisions to the grantee, several changes have been made to the structure and contents of the Head Start Review Report for FY 2005. The following is a list of these changes:

- Renamed "Area Summary" to "Area Strengths" and eliminated discussion of areas of noncompliance in this section.

- "Multiple methods and sources" are no longer required when discussing a grantee's strengths in the "Area Strengths" section of the Head Start Review Report.

- As part of the increased emphasis on system-to-service and system-to-system interrelationships for FY 2005, language about how to write and cite stand-alone and interrelated areas of noncompliance in the Head Start Review Report is included.

- Deficiency decisions are now included within the Head Start Review Report (and still in the cover letter).

- Starting in FY 2005, a list of all of the citations constituting an area of noncompliance or deficiency (as determined by the responsible HHS official or designee) will automatically be generated and placed at the end of each respective Core Question's Areas of Noncompliance section. Next to each citation will be the corresponding review decision - either "noncompliant" or "deficient".

- Beginning in FY 2005, the responsible HHS official (or designee) must, in addition to tracking corrective action through the corrective action screen, generate a follow-up report upon receipt and approval of a certification of compliance letter. These actions will help improve tracking of corrective action data.

Cover Letter Changes

Beginning in FY 2005, the web-based PRISM Software will support the generation of cover

letters (with the exception of follow-up review and notice of termination cover letters) to accompany the Head Start Review Report sent to the grantee.

PROCEDURAL AND POLICY CHANGES

- As part of the Head Start Bureau's efforts to identify potential income eligibility-related areas of noncompliance, all review teams must complete the new **Income Eligibility Data Collection Form** through the review of a sample of income eligibility determination records.

- Review teams will be asked to enter **funded and actual enrollment data** into the PRISM software.

- A greater emphasis will be placed on ascertaining grantee **compliance with other Federal, Tribal, State and local requirements.**

- Beginning in FY 2005, the Bureau will implement a **quality assurance initiative** in which specially trained reviewers, referred to as "Lead Consultants," will lead teams to conduct re-reviews of a sample of recently monitored grantees. More information about the new initiative is forthcoming.

- When possible, **new reviewers will be placed on teams with coach reviewers** as the new reviewers are learning their responsibilities.

CHANGES TO THE *PRISM GUIDE*
Term and Structure Changes
The term "applicable standards" has been replaced with "program requirements" for FY 2005. "Program requirements" refers to requirements as specified in the Head Start Act, the Head Start Program Performance Standards, and other relevant Federal, State, and local regulations.

Additionally, the structure of the *Guide* was altered with the addition of a new appendix, entitled "Reviewer Information." This appendix, which appears after the Forms Appendix and before the Resources List Appendix, includes information on reviewer job qualifications and descriptions, and supplemental information for certain reviewer processes as noted throughout the *Guide.*

New and Revised Forms
For FY 2005, a Community Partnerships Information Form has been added to the Forms Appendix. The intent of this form is for reviewers to gain background information and knowledge about the types and roles of the community partnerships present in the Head Start/Early Head Start programs before the interview protocol, so more time can be spent during the interview protocol discussing the outcomes of the partnerships. In addition, many

of the forms in this appendix have been revised slightly for FY 2005. Major changes occurred in two forms - the Summary of Review Decisions Worksheet and the Team Assignment Worksheet.

The Summary of Review Decisions form has been moved from its previous location in the *PRISM Instrument* to the Forms Appendix. This form was revised to allow the team leader to better map decision-making throughout the week. The form tracks the following elements for each Core Question as the review week progresses: issues raised by team members, follow-up items, possible citations, related citations and Core Questions, and potential strengths. Instructions for the Summary of Review Decisions Worksheet is located in front of the worksheet.

FY 2005 revisions to the Team Assignment Worksheet aims to better capture focus-child and family information. The section of the form that addresses focus-children and family assignments has been moved to the end of the form and moved into a new table format that includes columns for the grantee to write in background information and for the review team to coordinate logistical arrangements.

Additionally, the Grantee's Advance Activities Checklist, Team Leader's Advance Activities Checklist, and the Selection Process have been updated with minor revisions for FY 2005.

Reviewer Information and Resources Appendix

The Reviewer Code of Conduct, previously located in the Forms Appendix, has been updated for FY 2005 and moved to the new Reviewer Information Appendix.

The URLs listed in the Resources List Appendix were updated to ensure that all are accurate and the Web sites remain in working order.

CHANGES TO THE *PRISM INSTRUMENT*

Several changes were made to the *PRISM Instrument*, including:

- Each Core Question and its corresponding notes page have been revised so they appear back-to-back on the same page.

- Addition of OMB Circular citations to Core Question 8 (Fiscal Management).

- Moved a revised version of the Summary of Review Decisions Worksheet to the Forms Appendix.

- Changes to the Content Area Experts Interview Protocol, Staff Group Interview Protocol, Community Partnerships Interview Protocol, and the Governing Body Interview Protocol. Additionally, a What's New for Interview Protocols was added following the Core Question pages.

- Added two new sign-in sheets to use for the interviews. One sign-in sheet is for the Policy Council and Family Group Interviews, while the other is a General Sign-In Sheet to be used for all other interviews. Instructions for using these sign-in sheets are located immediately preceding the General Sign-In Sheet.

- Revised the Fiscal Checklist consistent with the discussion appearing at the front of this section.

- Revised and renamed the Bus Ride Checklist to the Transportation Services Checklist. The Transportation Services Checklist now better reflects the scope of Transportation Services and related program requirements. It should be used on all PRISM reviews, whether the grantee provides transportation services or not. In addition, the checklist's broader focus invites multiple reviewers to participate in information gathering. This allows the review team to ascertain compliance with transportation-related program requirements in the context of the grantee's other systems and services.

- Added an Income Eligibility Data Collection Form and accompanying instructions.

PRISM Overview

The *Guide* describes the Federal monitoring process for Head Start and Early Head Start programs and provides guidance to Federal Team Leaders (team leaders), review team members, and grantees regarding the conduct of reviews.

The *Guide* is divided into five chapters:

- What's New;

- PRISM Overview;

- Advance Activities;

- On-Site Activities; and

- Grantee Notice and Program Improvement.

Four appendices are included at the end of the *Guide*:

- *PRISM Instrument*;

- Forms;

- Reviewer Information; and

- Resources.

This chapter, PRISM Overview, begins with a brief background on Head Start and program monitoring. The remaining sections of the chapter summarize the elements of the PRISM monitoring process.

BACKGROUND: HEAD START AND PROGRAM MONITORING

The Head Start Program, which is authorized under the Head Start Act, provides grants to local public and private nonprofit and for-profit agencies to provide comprehensive child development services to economically disadvantaged children and families, with a special focus on helping children develop the early literacy and numeracy skills they need to be successful in school. Intended primarily for preschoolers from low-income families, Head Start promotes school readiness by enhancing the social and cognitive development of children through the provision of educational, health, nutritional, social, and other services. Head Start programs emphasize cognitive, language, and socio-emotional development to enable each child to develop and function at his or her highest potential. At least 10 percent of the enrollment opportunities in each program must be made available to children with disabilities. Head Start engages parents in their children's learning and helps them in making progress toward their educational, literacy, and employment goals. The Head Start program also emphasizes significant involvement of parents in the administration of local Head Start programs. In 1995, the Early Head Start program was established in recognition of the mounting evidence that the earliest years, from birth to 3 years of age, matter a great deal to children's growth and development.[1]

Head Start is administered by the Head Start Bureau of the Administration on Children, Youth and Families (ACYF). ACYF is a part of the Administration for Children and Families (ACF) within the Department of Health and Human Services (HHS).

Head Start program requirements are specified in legislation (i.e., the Head Start Act and other Federal, State and local statutes) and in various Federal, State, and local regulations and other requirements. (Regulations are rules issued by governmental agencies that have the force of law.) The set of regulations that pertain to Head Start and Early Head Start programs includes the Head Start Program Performance Standards (Performance Standards), other Head Start regulations, and other relevant Federal, State, and local regulations.[2]

The Head Start Act mandates that each Head Start grantee receive a full on-site monitoring review at least once every 3 years, that each new program be reviewed after the completion of its first year (and then at least every 3 years thereafter), and that follow-up reviews be conducted for grantees that substantially fail to meet program requirements.[3] During a

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[1] Throughout the *PRISM Guide*, "Head Start" is used to include both Head Start and Early Head Start programs, unless otherwise specified. Both programs are authorized under the Head Start Act (42 USC 9831, et seq.).

[2] Strictly speaking, the Head Start Program Performance Standards are contained in 45 CFR Part 1304, and the Head Start Program Performance Standards on Services to Children with Disabilities are contained in 45 CFR Part 1308. Other rules and requirements applicable to Head Start, such as those relating to grants administration, eligibility and enrollment, program staffing, and other topics are contained in 45 CFR Parts 1301, 1302, 1303, 1305, 1306, 1309, and 1310.

[3] 42 USC 9836a.

monitoring review, a team of qualified reviewers, led by a team leader, assesses whether or not the Head Start program is in compliance with program requirements.

WHAT IS PRISM?

The Program Review Instrument for Systems Monitoring (PRISM) is both a set of instruments and the process used to conduct Federal monitoring of Head Start grantees. PRISM was developed to integrate into the monitoring process the 1998 revisions to the Performance Standards, which reorganized the standards to reduce fragmentation and encourage holistic approaches to the delivery of quality services.[4]

PRISM organizes elements in the Performance Standards, other program regulations, and portions of the Head Start Act into **Core Questions**. Each Core Question addresses a set of related items and prompts the review team to assess whether the program requirements related to the Core Question are being met. Included are nine questions on the *program services and partnerships* that all Head Start grantees must implement. Reviewers with primary responsibility for these Core Questions are the **Service Reviewers**. The remaining nine questions focus on the *program systems* that are in place to support delivery of services and partnership building. Reviewers with primary responsibility for these Core Questions are the **Systems Reviewers**. While Service Reviewers and Systems Reviewers assume primary responsibility for specific Core Questions, all reviewers work collaboratively in answering all the Core Questions and assessing compliance with applicable program requirements.

A sample Core Question layout (from the Core Questions section of the *PRISM Instrument*) is shown in Figure 1. The Core Question number and title appear at the top of the page; the top left portion of the page contains the full text of the Core Question. The top right section of the page includes citations for the program requirements applicable to the Core Question. The bottom portion of the page includes instructions on how reviewers gather information pertinent to the program requirements applicable to that particular question. The Core Question framework "drives" the review—by the end of the visit, the team recommends program requirements compliance decisions under all 18 Core Questions. The *PRISM Instrument* is the tool that review team members use to gather data to answer the Core Questions and monitor compliance with applicable program requirements. The specific tools contained within the *PRISM Instrument* include:

- The set of 18 Core Questions;

- Guidance on conducting an initial meeting with grantee management and staff;

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[4] The revisions to the Performance Standards were finalized in November 1996 and took effect on January 1, 1998. For more information on the evolution of the Performance Standards, including the increased emphasis on holistic, integrated service delivery, see the discussion in the Preamble to the Final Rule (*Federal Register*, Vol. 61, No. 215 (November 5, 1996)).

Figure 1.—Sample Core Question Layout

Core Question

Performance Standard(s)

QUESTION 1. PROGRAM GOVERNANCE	STANDARDS

How effective is the grantee's system of shared governance in supporting the implementation of quality services to children and families?

1304.50, including Appendix A—Governance and Management Responsibilities; 1304.52 (k)

How does the system ensure:

- a governing body that participates in key decisionmaking and oversight for the program, including the formation of the Policy Council structure and function?
- a formal structure of policy groups and Parent Committees with appropriate composition and process of formation?
- the assignment of appropriate governing body and policy group responsibilities, including the development, review, and approval/disapproval of program policies and procedures?
- written internal dispute resolution procedures for conflicts between the governing body and policy group?
- inclusive and well-functioning Parent Committees?

Instructions for Reviewers

- *REFER TO*—Information on governance gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.
- *OBSERVE*—Policy Council meeting.
- *INTERVIEW*—As needed, any additional governing body and policy group members, and staff.
- *REVIEW*—Policies and procedures pertaining to governance; written definitions of roles and responsibilities of governing body members; evidence of training; governing body and Policy Council by-laws; selection of minutes of governing body, Policy Council, Policy Committee, and Parent Committee meetings; and grantee and delegate agency agreements (if applicable).

- Protocols for interviewing grantee staff, Head Start families, Policy Council and Governing Body members, and child care and other community partners; and

- Instruments and checklists for recording observations during visits to classrooms, homes, and other locations.

HOW DOES THE PRISM PROCESS WORK?

Fundamental to the PRISM process are the collection, verification, and analysis of information (i.e., evidence) from multiple sources by reviewers to establish relevant facts. Based on the analysis of these facts and recommendations of the review team, the team leader makes preliminary decisions regarding grantee compliance with program requirements, which are finalized by the responsible HHS official or designee. The process culminates in the development of a Head Start Review Report, which communicates final compliance decisions and summarizes program strengths. Integral to the PRISM process is a "systems" approach to information collection and analysis that emphasizes identification of interrelationships among systems, services, and partnerships. As well, PRISM employs a special process to examine the experiences of a sample of Head Start children and their families. While on-site, review team

members communicate frequently with the grantee regarding potential areas of noncompliance and with each other throughout the day and in daily team meetings. Each of these elements, including the three phases that comprise a grantee review, are described more fully below.

Three Phases

The three phases of a grantee review include (each of these phases is described in more detail in subsequent chapters):

- **Advance Activities.** Activities during this phase include collecting background information, making logistical arrangements, requesting and assigning reviewers to a review team, selecting delegate agencies, centers and settings, and identifying focus children and families. This phase also includes advance review of background and other information by review team members.

- **On-Site Activities.** Activities during this phase include information collection and verification to establish facts, including document reviews, center- and home-based visits, interviews, and grantee briefings. During this phase, reviewers communicate with each other during the day and participate in team meetings to share and analyze information, and to identify any linkages among services and systems. During the final stage of this phase, the team, under the direction of the team leader, develops the *draft* Head Start Review Report.

- **Grantee Notice and Program Improvement.** Activities during this phase, which are carried out by the responsible HHS official or designee, include finalizing compliance decisions and developing and delivering to the grantee the *final* Head Start Review Report. This phase also includes program improvement activities (if applicable), development of Quality Improvement Plans (QIPs) by grantees in deficient status, and access to training and technical assistance (T/TA).

Systems Approach: Integration of Systems and Services

PRISM employs a "systems approach" to monitoring, reflecting the vision articulated within the Performance Standards that strong systems are essential to maintaining program quality. Under this approach, failures within service areas (including partnership building) may not only reflect problems in service delivery, but if these failures are pervasive, they may indicate the presence of underlying systems problems. Systems problems may also be stand-alone or pervasive, with pervasive problems indicating possible underlying problems in other systems areas. The review team seeks to identify, verify, and assess all types of failures (i.e., stand-alone and interrelated). PRISM focuses on how a grantee's systems, services, and partnering

Figure 2.—PRISM Framework

EFFECTIVENESS OF SYSTEMS	IMPLEMENTATION OF SERVICES AND PARTNERSHIPS								
	Child Development and Health Services				Family and Community Partnerships			Program Design
	Prevention & Early Intervention	Individu-alization	Disabilities Services	Curriculum and Assessment	Child Outcomes	Family Partnership Building	Parent Involvement	Community Partnerships	Facilities, Materials, Equipment, and Transportation
Program Governance									
Planning									
Communication									
Record-Keeping & Reporting									
Ongoing Monitoring									
Self-Assessment									
Human Resources									
Fiscal Management									
Eligibility, Recruitment, Selection, Enrollment, and Attendance									

activities interact to create and maintain a quality program. The PRISM Framework (Figure 2) illustrates the interrelationships among systems, services, and partnerships.

Focus Child and Family Process

Through the focus child and family process, reviewers use various PRISM instruments and protocols to examine the actual experiences of a group of Head Start children and their families, covering material from the time they entered Head Start to the present. This holistic, multifaceted view of a selection of children and their families allows reviewers to see how the grantee integrates systems and services.

Review Team Communication: On-Site and Team Meetings

Reviewers share information with each other both throughout the day and during team meetings in the evening. Ongoing daily communication may, for example, take the form of cell phone calls between service reviewers at different sites, or a service reviewer, who has observed pervasive service delivery failures, alerting a systems reviewer to possible underlying systems problems. This ongoing communication facilitates collection of additional information as soon as possible.

Team meetings are the vehicle for integrating and analyzing data on the Core Questions and applicable program requirements. They are analytic sessions through which review team members continue to share information, integrate their individual observations, identify interrelationships among systems and services, identify and analyze strengths and underlying issues, and discuss additional information collection and verification needed to establish relevant facts and circumstances. The team leader directs the work of the group during team meetings, facilitating discussions, probing for analysis, and assigning reviewers to follow up on issues identified during the meeting. During the final team meeting, the team leader makes preliminary decisions regarding compliance, which are finalized by the responsible HHS official or designee during the Grantee Notice and Program Improvement phase.

Ongoing Communication with the Grantee

The team leader guides the team in providing ongoing feedback to grantee staff during the on-site review phase through both informal and formal grantee briefings, which occur throughout the week and as part of the Summary Meeting. When a reviewer encounters information that raises any concerns about potential compliance issues, the reviewer should contact the appropriate grantee staff as soon as possible to discuss.

Head Start Review Report

The Head Start Review Report is prepared at the end of the On-Site Activities phase (i.e., draft Head Start Review Report) and finalized by the responsible HHS official or designee (i.e., final Head Start Review Report). The review report summarizes grantee strengths, identifies compliance decisions, and indicates if the grantee has any deficiencies. Because the review

report provides legal notice to the grantee of any areas of noncompliance and deficiencies, it is imperative that the review report provide accurate compliance decisions that are clearly articulated and based on well-substantiated evidence. Review reports must also be written using succinct and clear prose. (Specific guidance regarding development of the Head Start Review Report is provided in the On-Site Activities and Grantee Notice and Program Improvement chapters.)

The final Head Start Review Report and accompanying cover letter must be mailed to the grantee governing body president within 45 calendar days, beginning the *first business day* of the end of the on-site review.[5] The cover letter identifies any areas of noncompliance and deficiencies (if applicable) contained in the final Head Start Review Report, and specifies any necessary corrective action and the period for making such corrections. (Specific guidance regarding development of the cover letters is provided in the Grantee Notice and Program Improvement chapter.) Beginning in FY 2005, the web-based PRISM Software assists in the development of cover letters. (See the PRISM Software User Manual for details.)

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[5] The Head Start Program Performance Standards require that the grantee be notified "promptly" in writing of any noncompliance or deficiency (see 45 CFR 1304.61(a) and 45 CFR 1304.60(b), respectively). For this reason, delivery of the final Head Start Review Report within 45 calendar days of the end of the on-site phase of the review is imperative.

Advance Activities

The Advance Activities phase emphasizes collecting and reviewing as much relevant material as possible prior to the On-Site Activities phase. This allows the review team to maximize time available for collecting and verifying information that is only available on-site and for writing high-quality (i.e., accurate, clear, and concise) Head Start Review Reports.

There are five main activities undertaken by the team leader during the Advance Activities phase. These include: (1) initial contact with the grantee and collection of background and other information from the grantee and Program Specialist in the Regional Office; (2) logistical preparations; (3) selection of review team members and assignment of Core Questions; (4) selection of delegate agencies, centers and settings, and focus children and families; (5) and dissemination of background information to review team members.

Refer to the advance activities checklists (i.e., Team Leader's Advance Activities Checklist and Grantee's Advance Activities Checklist) in the Forms Appendix for detailed guidance on specific advance activities to be performed by the team leader and grantee, respectively.

COLLECTING INFORMATION IN ADVANCE

The team leader should contact the grantee and relevant Program Specialist early in the Advance Activities phase. In addition to making introductions and advising the grantee and Program Specialist of the review dates, a primary goal of this initial contact is to request background and other information in advance of the On-Site Activities phase of the review.

Collecting and reviewing information from the grantee directly, as well as from the Program Specialist in advance of the On-Site Activities phase, has a number of critical benefits. First, this information can help the team leader to determine the types of reviewer expertise needed and assign reviewers to their roles. Second, review of materials in advance by reviewers reduces the potential workload associated with the On-Site Activities phase, allowing more time for data collection, verification of on-site data, and the development of an accurate, clear, concise, and high-quality draft Head Start Review Report. Finally, having reviewed background materials, reviewers are better positioned to prioritize on-site activities and identify specific lines of questioning. Refer to the PRISM Records Request in the Forms Appendix for an exhaustive list of documents that are candidates for advance review.

LOGISTICAL ARRANGEMENTS

Early in the planning process, the team leader should contact the grantee to discuss logistical arrangements for the meetings and interviews, as well as for the document and file reviews that will occur during the On-Site Activities phase of the review. For meetings and interviews, such logistics typically include specifying the dates and times during which the meetings and interviews will occur, specifying participants for each of the meetings and interviews, identifying locations where the meetings and interviews will be conducted, specifying any materials or equipment required (e.g., flip-chart stand and flip-chart paper, pens, extension cords for laptop computers, projection screen, overhead projector, or LCD projector), specifying any reasonable accommodations needed by grantee or review team participants, and arranging for transportation (e.g., transporting parents, children, and grantee staff to and from meetings and interviews and transporting review team members to and from classrooms, centers, and other locations), as applicable.

Refer to the Team Leader's Advance Activities Checklist, the Team Leader's Team Assignment Worksheet, and Grantee's Advance Activities Checklist in the Forms Appendix for additional guidance on making logistical arrangements for on-site activities. All on-site activities are described in detail in the On-Site Activities chapter.

REQUESTING AND ASSIGNING REVIEWERS

The team leader is responsible for determining the types of expertise and number of reviewers needed, and for assigning reviewers to take responsibility for particular Core Questions. The size of the review team and the roles and responsibilities of the team members will vary across reviews.

Team leaders request review team members based on reviewer skills needed. The national monitoring support contractor will assemble review teams based on the specific skill sets identified by the team leader. Specific reviewer selection practices that are intended to improve the composition of review teams have also been implemented. These practices address the number of new reviewers required on a team and the use of reviewers who are employed by a Head Start grantee or delegate agency, as opposed to consultants (those who are not employed by a Head Start grantee).

The following sections provide a set of recommendations to help guide the team leader through this decision-making process. A description of how the Regional Review Coordinators assemble the review teams is also included.

Requesting Reviewers

Together, review team members must have the expertise to review all 18 Core Questions. The team leader can select reviewers with expertise in the following areas:

- Early Childhood Development (ECD);

- Health (HEA);

- Disabilities (DIS);

- Infant and Toddler Child Development (ITCD);

- Infant and Toddler Disabilities (ITD);

- Infant and Toddler Maternal and Child Health (MCH);

- Family and Community Partnerships (FCP);

- Program Design and Management (PDM);

- Fiscal Management (FIS); and

- Report Coordination (RC).

The Bureau has implemented an effort to ensure that all reviewers meet minimum standards for education and experience in their respective areas. Only qualified reviewers will be assigned to review teams. More detailed information on reviewer qualifications is contained in the Reviewer Information Appendix.

Determining Team Size and Expertise. The team leader should keep in mind that **a key objective in forming a team is to use the fewest number of reviewers possible without compromising the team's ability to conduct a thorough, high-quality review.** Conducting reviews with the smallest team possible is desirable for at least two reasons. First, keeping teams small helps minimize review costs. Second, the presence of small review teams helps minimize for the grantee any disruptive effects associated with the reviews, simplifies review logistics, and facilitates an efficient review process (e.g., team meetings of shorter duration with focused discussions).

In determining both team size and expertise, the team leader should consider various relevant factors, such as:

- Complexity of the grantee's management structure;

- Presence and number of delegate agencies;

- Geographic considerations (e.g., distance between centers, classrooms, delegate agencies);

- Complexity and nature of program options;

- Presence of child care partner agencies;

- Languages spoken;

- Grantee type (e.g., county government, community action program, school district);

- Recent program changes (e.g., recent program expansion or key staff turnover); and

- Factors relevant to the grantee's fiscal operations (which might suggest the need for one or more additional Fiscal Reviewers), such as:

  — The presence of a qualified audit;

  — The presence of many delegate agencies;

  — The presence of problematic or complex fiscal issues (as identified in a previous Head Start Review Report, for example), such as unusual or complex cost allocation situations, non-Federal costs that are contingent primarily on volunteer services, or expenditures not included in the funding application;

  — The presence of a complex organizational structure, such as multiple shared staff, partnerships, and/or program options; or

  — Recent or frequent turnover among key staff, such as fiscal managers, program directors, or members of the governing board.

The team leader might also wish to request reviewers who have expertise relevant to other key grantee characteristics, such as special knowledge of issues specific to tribal or migrant and seasonal programs. Finally, for grantees with large delegate agencies, the team leader may choose to employ multiple review teams (i.e., one team for the grantee and additional team(s) for the delegate(s)).

In addition to the considerations described on the previous page, the team leader must comply with the following requirements:

- If the grantee provides Early Head Start, review team members with relevant Early Head Start expertise (i.e., Infant and Toddler Child Development or Infant and Toddler Maternal and Child Health) must have completed approved Early Head Start training. (The team leader does not need to request reviewers who have completed such training; the Regional Review Coordinators will include on review teams only those reviewers who have received required Early Head Start training.) In addition to monitoring the Early Head Start program, these reviewers may be given additional monitoring responsibilities, depending upon their knowledge and expertise.

- Unless the grantee provides only Early Head Start, the review team must include at least one reviewer trained to evaluate the grantee's approach to measuring outcomes for children. That is, the team must include a reviewer who attended outcomes training in fall 2001 or summer 2002. This individual will assist the team leader to ensure that all other team members understand their roles regarding monitoring child outcomes requirements.

The Review Team Request Form. Once the team leader has determined the number of reviewers and areas of expertise needed on the review team, and has verified that the experience of the reviewers requested matches the characteristics of the grantee, he or she summarizes this information on the Review Team Request Form. This form must be completed online at the team leader Web site (www.headstartreviews.com) and submitted no later than 100 days prior to the program review. Instructions for completing the Review Team Request Form online can also be found on the team leader Web site.

In addition to selecting reviewers based on service/system area expertise, expertise with program option or size, and bilingual skills, **team leaders can also indicate those areas in which they do not want a new reviewer or areas in which they need an experienced reviewer.** An "experienced" reviewer is defined as someone who has participated in at least nine reviews in the past 3 years (i.e., since FY 2001), while a "new" reviewer is someone who has never participated in a review or who did not participate in a review in the prior fiscal year.

Assembling the Review Team

As part of the national monitoring support contract, the Regional Review Coordinator uses the information provided on the Review Team Request Form, together with information maintained in the Head Start Review Tracking System, to set up each review and select a team of reviewers that is appropriate for the grantee. The Regional Review Coordinator will make every attempt to assemble teams based on the skill sets requested by the team leaders. In some instances, there may be limitations to identifying reviewers with specific degrees or experiences

based on the information contained in reviewer profiles. While the entire national pool of reviewers is available to all regions, Bureau policy does not allow reviewers to review programs within the state in which they live.

In addition to the skill sets requested by the team leader, the Regional Review Coordinator uses guidelines set by the Bureau to determine the number of times individual reviewers can be assigned to a review team and the ratio of new and experienced members on a team.[1] These guidelines follow:

- Reviewers who are employees of a Head Start grantee or delegate agency are limited to participating in a maximum of three reviews per year.

- Reviewers not employed by a Head Start grantee or delegate agency are limited to participating in a maximum of 17 review teams per year.

- Staff employed by a grantee or employed by a delegate of a grantee identified as deficient cannot participate on a review until the deficiencies have been resolved.

- Reviewers cannot review programs within their home state; they may only participate in reviews outside of the state where they live.

- New reviewers will be placed on teams with coach reviewers to assist the new reviewers learn their responsibilities.

Reviewers with Limited Availability. Certain reviewers have limited availability to conduct reviews. If there is a shortage of a particular reviewer specialty, such as Report Coordinators or Fiscal Reviewers, Regional Review Coordinators are permitted to fill up to 5 percent of their review assignments without using the computer-assisted system, provided that the limited availability has been approved by the Head Start Bureau. In such cases, those reviewers with the least availability are listed first.

Review Team Modification. Once the Regional Review Coordinator completes the assignment of individual reviewers to a team using the computer-assisted process, names of individual team members are shared with the team leader, who then must pass the team roster along to the grantee. The team leader and grantee each have the right to refuse one reviewer per review team assigned to a Danya trip ID. Please see the Reviewer Information Appendix for more information regarding Team Leader and Grantee Right of Refusal processes.

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[1] Administration on Children, Youth and Families (2002).

Assigning Reviewers to Core Questions and Use of Fiscal Reviewers

The team leader assigns to each reviewer lead and support roles on Core Questions related to reviewers' respective fields of expertise. The team leader should assign responsibilities for Core Questions to ensure that (a) all systems, services, and partnerships are covered and (b) team members are assigned to make best use of their knowledge, skills, and experience.

Once the Regional Review Coordinator has notified the team leader of the confirmed list of review team members, the team leader can make individual assignments using the Team Assignment Worksheet, which has been revised for FY 2005. The Team Assignment Worksheet summarizes general assignments of responsibility and specific assignments for review activities. A blank form can be found in the Forms Appendix. It begins by providing space to summarize responsibilities for the Core Questions. Next to each of the 18 Core Questions, the team leader can record the name of the lead reviewer and the names of reviewers who will support the lead reviewer in gathering information and preparing the report. **Team leaders must assign Fiscal Reviewers responsibility for the Fiscal Management Core Question only.** Fiscal Reviewers should not take the lead on other Core Questions nor engage in review activities that are not related to the grantee's fiscal management system. This policy helps ensure that Fiscal Reviewers have adequate time to review a grantee's fiscal operations.

Following the set of Core Questions, the worksheet lists the meetings that occur during the initial day(s) of the review. **In order to maximize the time that reviewers have to conduct data-gathering activities related to their area of expertise, team leaders should use discretion in assigning individuals to interviews.** For each meeting, information can be recorded to summarize who will attend, when the meeting will be held, and where it will occur.

If there are special roles for individuals (e.g., facilitator and note taker), there is space to write in the names of reviewers who will assume those roles. **In keeping with the effort to ensure that Fiscal Reviewers have adequate time to review a grantee's fiscal operations, team leaders should assign Fiscal Reviewers to participate only in those meetings and interviews that address fiscally relevant issues.** While the team leader has discretion in making such assignments, it is expected that the Fiscal Reviewer would attend, at a minimum, two interviews: (1) the Governing Body Interview and (2) the Policy Council Interview.

Following the section on interview assignments, the worksheet lists checklist and additional meeting assignments, including team meetings, grantee briefings, and the Summary Meeting. Spaces are available to record meeting and checklist assignments, meeting/observation schedules and locations.

The final page of the Team Assignment Worksheet contains an area to help plan focus children and family assignments. This section has been updated for FY 2005, and aims to better capture

all of the necessary information the review team may need about the focus children and their families, including the child's location, age, program option, presence of a disability, language spoken, parents' names and interviews each are attending, and siblings' names (if applicable). This more detailed listing of information for each of the focus children and their families, by classroom, is intended to minimize effort in coordinating review team logistics.

Note that the focus child and family information table is split into two sets of columns. The first eight columns consist of the focus child and family background information and should be filled out by the grantee. The last two columns regarding reviewer assignments and observation times may be filled out by the review team. Additionally, as this form requires the grantee to complete a certain amount of information for each focus child and family, this table should be completed only after the list of focus children has been finalized. Refer to the next section for more information regarding the setting and focus child selection processes.

SELECTION OF DELEGATES, SETTINGS, FOCUS CHILDREN, AND INCOME ELIGIBILITY FILES

This section presents the selection process undertaken by team leaders to make a solid, reasoned judgment of the settings to visit and the children on whom to focus. It is not necessary to visit all delegates, centers, and classrooms of a grantee in order to determine the effectiveness of the grantee's systems or services. For most grantees, it will not be possible to visit all family child care homes or accompany all home visitors. The selection process is designed to allow the team to monitor the effectiveness of systems and the implementation of services and partnerships in all types of settings.

Selecting Delegates. When grantees have delegate agencies, the team leader will determine the delegates the team will visit. It is very important that the team see the full range of program services offered. Decisions should not be based on a theory of rotation (i.e., a delegate is not selected just because it was not visited in the last review).

Selecting Centers or Geographic Areas. The team leader selects the centers and geographic areas (used to select family child care homes and home visitors) that the reviewers will visit. The sites selected should represent, to the extent practicable, the grantee's program, including its diversity of families served, ages served, and program options. For example, it is important to include, to the extent possible, an Early Head Start site, a child care partnership, and a home-based or family child care option.

Selecting Classrooms, Family Child Care Homes, and Home Visitors. The team leader can randomly choose classes within selected centers or family child care homes or home visitors within a geographic area.

Selecting Focus Children and Their Families. The team leader will select the children and their families that will be a focus of the data-gathering activities during the On-Site Activities phase of the review. As part of this process, the team leader may ask the grantee to provide enrollment rosters or class lists, or the team leader may ask the grantee to choose one to four children in each class—one to be a focus child and the others to act as back-ups. At a minimum, focus children and families should include children enrolled in each classroom and family child care home to be visited. It is not expected that every program activity will be represented by every family, but rather that the experiences of the group of children and families chosen will give reviewers a comprehensive view of how the program works. Careful attention should be given to ensure that the children selected reflect the age groups served as well as (1) families involved in child care partnerships and (2) children with disabilities, including at least one child with more significant disabilities.

Typically, each Service Reviewer is assigned three to five focus children and their families by the team leader.

The Forms Appendix contains a document entitled "The Selection Process," which provides a step-by-step methodology to prepare for a review. Using the Selection Tree Form, instructions are given for selection at four different levels: (1) delegate agencies; (2) centers or geographic areas; (3) classrooms, family child care homes, and home visitors; and (4) focus children and their families. A blank Selection Tree Form may be found in the Forms Appendix.

Selecting Files for Income Eligibility Review. A sample of children's files will be reviewed using the Income Eligibility Data Collection Form located in the *PRISM Instrument*. Please refer to the Income Eligibility Process and Data Collection Form Instructions located in the *PRISM Instrument* for a more detailed description of this process.

SHARING INFORMATION WITH REVIEWERS

It is critical that team leaders send to review team members logistical and relevant background materials obtained from either the Program Specialist and/or the grantee (see Collecting Information in Advance, earlier in this chapter), as applicable.

All Reviewers

Background documents provided to all reviewers might include, for example, a copy of the program's self-assessment, community assessment, Program Information Report, and an organizational chart. For FY 2005, a Community Partnerships Information Form has been added to the Forms Appendix. The intent of this form is for reviewers to gain background information and knowledge about the types and roles of the community partnerships present

in the Head Start/Early Head Start programs. The questions contained in this form come from questions that appeared in the FY 2004 version of the Community Partnerships Interview Protocol. These questions were extracted from the FY 2004 version of the protocol and placed in this form so that the reviewers can come to the interview with knowledge of the community partnerships already established, and spend more time focusing on the outcomes of these partnerships. Once the team leader identifies the participants for the Community Partnerships interview, the grantee should send this form to those participants and request its completion and prompt return to the grantee. The grantee should forward the completed forms to the team leader for dissemination to pertinent reviewers (the team leader may decide if the completed forms should be sent along with other documents in advance of the review, or if the reviewers will have access to the forms at the first team meeting on Sunday or Monday morning at the grantee's office).

Review team members must review thoroughly all background materials received prior to the start of the On-Site Activities phase of the review to ensure they are familiar with relevant grantee characteristics and ready to begin gathering data upon arrival at the grantee site.

See the Team Leader's Advance Activities Checklist and the PRISM Records Request (in the Forms Appendix) for more detailed information regarding the collection and dissemination of background information for advance review.

Fiscal Reviewers

Fiscal Reviewers often have not had sufficient time to conduct a thorough review of a grantee's fiscal operations. **For this reason, Bureau policy allows, when appropriate, that Fiscal Reviewers may arrive in advance of other review team members to conduct an advance review of relevant fiscal documents.** Under this policy, the team leader, when choosing to have the Fiscal Reviewer arrive early, should require the grantee director to certify that relevant fiscal documents, as identified on the PRISM Records Request form, will be delivered to the review team's hotel no later than the Saturday afternoon before the Fiscal Reviewer is scheduled to begin. This certification must be delivered to the team leader 30 days in advance of the Fiscal Reviewer's anticipated arrival date, so that travel arrangements can be made that take advantage of advance lower fares. Fiscal Reviewers must spend a full day on Sunday at the hotel reviewing fiscal materials. The Fiscal Reviewer, in such cases, is expected to attend the Review Team Planning Meeting (usually on Sunday evening) and will be compensated for a full-day rather than a half-day of work.

When the advance fiscal review option is chosen, the materials requested in advance by the team leader may vary depending on the specific circumstances of the grantee. The team leader should contact the Fiscal Reviewer as soon as the Fiscal Reviewer has been selected to agree on the set of documents to be requested for advance review. The intent of this advance review is

to ensure the Fiscal Reviewer has an understanding of the grantee's fiscal operations prior to the beginning of the On-Site Activities phase of the review; it is not intended to substitute for the in-depth review of fiscal information that will be conducted on-site. Materials that should be requested for advance review may include:

- The grantee's most recent audit report and management letter;

- The grantee's current and prior year Financial Assistance Awards (FAAs);

- The grantee's current financial statements, including the balance sheet for the agency and the financial statements from the Head Start program;

- Organizational chart or list of staff and function of each staff person, including any vacancies;

- The grantee's Policies and Procedures manual(s) covering fiscal operations;

- The grantee's indirect cost agreement and cost allocation plan;

- The grantee's most recent financial reports as delivered to the governing bodies;

- Any construction and renovation awards and lease agreements;

- The grantee's most recent SF-269 (Financial Status Report) and PMS-272 (Federal Cash Transaction Report) with supporting documentation; and

- The grantee's most recent annual re-funding application.

On-Site Activities

During the On-Site Activities phase of the review, the review team gathers and verifies information from multiple sources to identify interrelationships among systems and services and to establish relevant facts, the team leader makes preliminary decisions regarding grantee compliance based on these facts, and the review team develops a draft Head Start Review Report. During this phase of the review, information is collected through the Entrance Meeting, group and individual interviews, file and other record reviews, and observations at centers and other settings. Reviewers exchange information during the day and during nightly team meetings. This phase of the review concludes with a Summary Meeting.

PHILOSOPHY OF PARTNERSHIP

During all phases of the review, and most critically during the On-Site Activities phase of the review, review team members should work to establish a sense of partnership with grantee staff. While the review team possesses detailed expertise regarding program requirements, it is the grantee administrators, staff, and parents who possess detailed information regarding community needs, family and child characteristics, and other factors that influence decisions regarding service delivery, procedures, and partnering activities. It is the responsibility of the review team to ensure grantee compliance with all applicable program requirements, and it is the responsibility of the grantee to identify and implement specific solutions to any areas of noncompliance identified during the review. To ensure that the philosophy of partnership is maintained, all review team members should:

- Show respect for grantee staff at all times;

- Value the time that grantee staff spends with reviewers by coordinating review team activities to minimize or eliminate multiple queries or requests for information;

- **Consult with appropriate grantee staff as soon as possible when encountering information that raises any concern(s) about potential compliance issues; and**

- Work to resolve any conflict as it occurs.

COLLECTING INFORMATION

Using the *PRISM Instrument*, reviewers are responsible for making recommendations about whether the grantee is complying with all program requirements by:

- Collecting information during the On-Site Activities phase of the review week and verifying and confirming the accuracy of the information collected;

- Sharing information with other review team members during the day and during team meetings and ensuring that interrelationships among systems, services, and partnerships are identified and assessed;

- Integrating data and making recommendations to the team leader; and

- Reporting the results.

Information-collecting responsibilities of team members differ, depending on their specific roles during the review. All review team members must, however, participate in the Review Team Planning Meeting and the Entrance Meeting so that everyone shares the "big picture" of the grantee and its services and partnerships.

- **The Review Team Planning Meeting** occurs prior to meeting with grantee staff, usually the evening before the first day of the On-Site Activities phase of the review. The purpose of this meeting is to describe the grantee and any delegates that will be reviewed, discuss assignments and the schedule of events of the review, and clarify the team leader's expectations. Since this is the first time the entire review team meets as a whole, it is a good opportunity to complete the last two columns regarding the logistics surrounding the observation of focus children and their families on the Team Assignment Worksheet located in the Forms Appendix. Additionally, this meeting is a good opportunity to make Transportation Services Checklist and Income Eligibility Data Collection Form assignments.

- **The Entrance Meeting and Grantee Presentation** serves as an introductory session for the review team and grantee staff. It generally includes a welcome from the grantee director, an introduction of staff, and an overview of the organization of the agency. It also includes welcoming remarks from the team leader, an introduction of review team members, and a brief overview of the on-site activities planned for the week. Following introductions, the grantee may make a brief presentation to discuss information about the community served by the grantee or delegate agency, the agency's goals and objectives, the general organization of services, outcomes for children and families, and staffing patterns.

While Service and Systems Reviewers have varying areas of expertise, roles, and

responsibilities, they all still must work together to ensure that any interrelationships between systems, services, and partnerships are identified. The roles and responsibilities for all reviewers and specific responsibilities for Services and Systems Reviewers are outlined below.

Collecting Information: All Reviewers

- All review teams must complete the new **Income Eligibility Data Collection Form** (introduced in FY 2005), which is designed to assist reviewers in assessing compliance with income eligibility requirements. Completion of this form requires the review of a small sample of randomly selected files. The Income Eligibility Data Collection Form (with instructions) is located in the PRISM Instrument Appendix.

- **All review teams must enter funded and actual enrollment data into the PRISM Software** for inclusion in the Head Start Review Report. Enrollment data should be entered for all triennial and first-year reviews.

  — For the grantee's "funded enrollment," enter the figure contained on the grantee's Financial Assistance Award (FAA) for the current period.

  — For the grantee's "actual enrollment," enter the number of children enrolled in all Head Start and Early Head Start programs during the week of the on-site review. When capturing actual enrollment figures, adhere to the following:

    ▪ If the review takes place within the last 60 days of the program year, enter the number of children enrolled during the week immediately *prior* to the start of the 60-day period.

    ▪ Count as enrolled any slots vacated by children within the past 30 days.

- All review teams must complete the revised **Transportation Services Checklist**, whether or not the grantee provides transportation services.

- All review teams should comprehensively examine the grantee's compliance with other Federal, Tribal, state and local regulations.

Collecting Information: Service Reviewers

Service Reviewers monitor compliance with program requirements by examining grantee service delivery and partnership activities. It is the Service Reviewers, as well, who participate in the focus child and family process. During this process, Service Reviewers use a variety of PRISM instruments and protocols to examine the actual experiences of a group of Head Start children and their families.

Service Reviewers must address information on nine Core Questions: Prevention and Early Intervention; Individualization; Disability Services; Curriculum and Assessment; Family Partnership Building; Parent Involvement; Community Partnerships; Facilities, Materials, Equipment, and Transportation; and Child Outcomes.

Working closely as a team, Service Reviewers coordinate specific review assignments. Tasks assigned to Service Reviewers may extend beyond their primary areas of expertise. Specific assignments for Service Reviewers include:

- Observing in children's settings. Service Reviewers observe their focus children in their center or home settings in order to get an overall picture of their circumstances, including the environment, interactions, and curriculum activities. These observations are integral to the child and family focus process. Service Reviewers use one of the two observation instruments in PRISM to record their observations. The **Classroom, Family Child Care, or Socialization Experience Observation Instrument** is used to record observations of a classroom, a family child care home, or a socialization experience that is part of a home-based option. The **Home Visit Observation Instrument** is used to record a reviewer's observations during home visits that are part of the home-based option.

- Completing a **Health and Safety Checklist** for each of the group settings in which they observe. Reviewers should pay special attention to ensure facilities comply with all Federal, State, and local licensing requirements.

- Completing assigned questions in the **Transportation Services Checklist** (revised for FY 2005) regardless of whether or not the program provides transportation services to children.

- Completing the **Income Eligibility Data Collection Form**, at the team leader's discretion. The team leader might otherwise assign completion of this checklist to one or more Service Reviewers.

- Interviewing education staff—teachers, home visitors, disabilities experts—who provide services to focus children.

- Interviewing family service staff who work with focus families.

- Reviewing child files on focus children, paying attention to information on enrollment, screening, health services, disabilities issues, anecdotal notes, ongoing reports of child progress, and child outcomes. Reviews of child files on focus children enable Service Reviewers to get a comprehensive picture of what services to children and families have been documented.

- Reviewing files on focus families, including information on family partnership development and participation in parent activities.

- Reviewing other documentation in order to answer questions related to services and partnerships. This may include, for example, Education Committee minutes, the child outcomes plan, Health Services Advisory minutes, and menus.

- **Participating in group interviews.** At the discretion of the team leader, Service Reviewers may participate in any of the scheduled group interviews. In particular, it may be helpful for at least one Service Reviewer to attend the following interviews:

  — **Family Group Interview.** This interview is an integral part of the focus child and family process. The purpose of the Family Group Interview is to find out from the focus families what their experience has been in Head Start. All focus families should be invited to attend the interview. Reviewers should make every effort to talk to members of all focus families during the review, including those who are not able to attend the Family Group Interview, so that there is a broad representation of parents in the review process. Alternative ways to contact parents who are not able to join the interview include telephone calls in the evening, speaking with parents when they drop off or pick up their children, or going on a bus ride.

  — **Community Partnerships Interview.** This interview is conducted with staff from agencies that work in partnership with Head Start. It may be appropriate to ask both Systems and Service Reviewers to attend the interview to ensure that issues related to systems, services, and partnerships are covered. Background information for this interview will be provided in the completed Community Partnerships Information Form and should be reviewed by the reviewers conducting this interview protocol.

  — **Child Care Partnerships Interview.** Designed for use with Head Start child care partners, this interview assists reviewers in understanding the development and implementation of the grantee's child care partnerships. It may be appropriate to ask both Systems and Service Reviewers to attend the interview to ensure that issues related to systems, services, and partnerships are covered.

During the **focus child and family process**, Service Reviewers look at focus children and their families from the perspective of their specific area of expertise, and they use this process to answer the Core Questions for which they have the lead. At the same time, they have a wider lens—looking at the whole child and family. This means that Service Reviewers engage in activities outside their own area of expertise. For example, Service Reviewers specializing in Family and Community Partnerships can conduct classroom observations or look at children's

Individual Education Plans (IEPs). Service Reviewers specializing in Child Development Services review the health file to see if their focus child has received all required screenings and at family files to see how the program has engaged in a partnership with their family. Service Reviewers specializing in Health examine screening and assessment data, assess how the program has individualized services for the focus child, and track outcomes. Because individual reviewers may not be experts in all areas, it is vital that all reviewers coordinate their work closely. It is the responsibility of all reviewers to regularly share with each other information they encounter (i.e., through file and document reviews, interviews, and observations) in areas outside their own area of expertise to enable the team to identify patterns. Reviewers should share information with other review team members throughout the day as well as at team meetings.

Collecting Information: Systems Reviewers

During the On-Site Activities phase, Systems Reviewers make use of one checklist and several interview protocols from the *PRISM Instrument* to address information on nine Core Questions: Program Governance; Planning; Communication; Record-Keeping and Reporting; Ongoing Monitoring; Self-Assessment; Human Resources; Fiscal Management; and Eligibility, Recruitment, Selection, Enrollment, and Attendance. In addition, Systems Reviewers are responsible for providing support to Service Reviewers for the Core Question on Child Outcomes. Specific assignments for Systems Reviewers include:

- Interviewing staff with direct knowledge of systems issues.

- Reviewing documentation to obtain information related to systems.

- Participating in group interviews. Four protocols are helpful in understanding the grantee's systems, including the following:

  — **Governing Body Interview.** This interview contains questions for members of the grantee governing group and assists in addressing the issues related to how the governing body is involved in the agency's planning process, exercises oversight, and ensures accountability.

  — **Policy Council Interview.** This interview also contains questions pertaining to governance and is used with Policy Council members following a regular business meeting of the Policy Council.

  — **Community Partnerships Interview.** As noted, it may be appropriate to ask both Systems and Service Reviewers to attend this interview.

  — **Child Care Partnerships Interview.** As noted, it may be appropriate to ask both Systems and Service Reviewers to attend this interview.

- Completing assigned questions in the **Transportation Services Checklist** (revised for FY 2005) regardless of whether or not the program provides transportation services to children.

- Completing the **Income Eligibility Data Collection Form**, at the team leader's discretion. The team leader might otherwise assign completion of this checklist to one or more Systems Reviewers.

- Completing the **Fiscal Checklist**. Beginning in FY 2005, the fiscal monitoring process has been substantially revised. The Bureau has adopted a "risk-based" approach to fiscal monitoring, consistent with the risk-based framework adopted by the Government Accountability Office (GAO) and the Committee of Sponsoring Organizations of the Treadway Commission (COSO).[1] Under the new risk-based approach, the objective of fiscal monitoring has been broadened to include a prospective element. That is, in addition to assessing compliance with applicable program requirements, the fiscal review process includes assessment of a set of prioritized indicators (i.e., "red flags") designed to identify underlying fiscal problems early. These indicators focus first on those areas that, if irregularities were present, would likely have the greatest adverse impact on the fiscal health of the grantee.

The new Fiscal Checklist is divided into three sections. The first section includes the set of red-flag questions. The second section includes a set of questions that directly assess compliance with specific program requirements. The third section assesses fiscal health in each of two major areas: internal controls and governance.

VERIFICATION OF INFORMATION

As review team members gather information from multiple sources during the On-Site Activities phase of the review, they must also verify the accuracy of the information they collect. Accurate information is crucial to establishing correctly the relevant facts that serve as the basis for assessing grantee compliance. In collecting information, reviewers should follow these principles:

- **Collect information from multiple sources** (i.e., whenever possible, the reviewer should seek to obtain additional information that might corroborate or contradict the content of the information already gathered);

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[1] General Accounting Office, *Standards for Internal Control in the Federal Government*, November 1999 (GAO/AIMD-00-21.3.1) and Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control -- Integrated Framework* (July 1994).

- **Rely on the best evidence available** (e.g., firsthand information is preferred over secondhand information); and

- **Weigh the evidence when considering contradictory information** (e.g., give less weight to uncorroborated testimony than to corroborative written evidence from multiple sources).

In obtaining information from as many sources as possible, reviewers should consult both with the grantee and with each other, as described below.

Consulting With the Grantee

When and if, based on information collected, a reviewer first identifies a concern, the reviewer should consult immediately with the appropriate grantee staff, identifying the concern, and summarizing for the grantee both the content and sources of information collected. This consultation provides the grantee an opportunity either to confirm the validity of the concern or to direct the reviewer to additional relevant information, if available, that might resolve the matter.

Consulting With Review Team Members

If the grantee confirms the validity of the concern or is not able to provide sufficient clarification or additional information for resolution, the reviewer should immediately alert the team leader and one or more review team members so that these reviewers might pursue information relevant to the concern, as well.

In particular, Service Reviewers who have identified concerns that are pervasive should immediately consult with one or more Systems Reviewers to ensure that relevant systems are examined for information concerning interrelationships between systems and services. Similarly, Systems Reviewers should also consult with other Systems Reviewers to see if a concern is pervasive throughout multiple systems. By alerting other reviewers immediately to concerns, reviewers who are best-positioned to gather relevant information have the opportunity to do so as soon as possible. Early efforts to verify critical information during the day also ensure multiple opportunities to exchange information during team meetings and to identify additional approaches to gathering and verifying data. Finally, alerting Systems Reviewers immediately to potential concerns that are pervasive maximizes the time available to Systems Reviewers to identify any systems irregularities that might underlie problems in service delivery or partnering activities.

REVIEW TEAM MEETINGS

Team meetings, which usually occur at the end of each day while on-site, are a critical component of the On-Site Activities phase. Typically, team members participate in five team

meetings while on-site, with the first meeting occurring on Sunday evening and the fifth meeting occurring on Thursday. Overall, the team meetings provide review members with opportunities such as:

- Sharing information about the grantee's systems, services, and partnerships;

- Clarifying each reviewer's understanding of relevant facts, as established by the information (i.e., evidence) gathered, that will form the basis for decisions regarding compliance;

- Planning for the subsequent day's activities, which may be assisted by using the Team Assignment Worksheet located in the Forms Appendix;

- Providing the team leader with the information needed so he/she can make preliminary compliance decisions, and using the Summary of Review Decisions Worksheet located in the Forms Appendix to track daily discussions and follow-up activities regarding these decisions; and

- Writing the draft Head Start Review Report.

Expectations of Reviewers at Team Meetings

To ensure that team meetings are conducted efficiently, reviewers must come to the meetings prepared. For example, reviewers are encouraged to organize and summarize their notes prior to the nightly meetings. This includes reviewing checklists and any observation instruments used (e.g., the Health and Safety Checklist). When reviewers have worked in pairs or small groups (e.g., to conduct a Governing Body Interview), they should compare and reconcile their notes and recollections prior to team meetings. Such interaction—outside of team meetings—is critical to ensure efficient use of time in the team meetings.

During the meeting, reviewers are expected to summarize their results and **recommend** decisions regarding compliance. (The team leader is responsible for making **preliminary** compliance decisions; decisions are **finalized** at the Regional Office.) Some guidelines for this process follow:

- Reviewers must ground their judgments in fact, based on what they or other reviewers observed, heard, or read.

- Reviewers must identify the program requirement(s) associated with each suspected area of noncompliance.

- The individual with the lead for each Core Question begins the discussion by summarizing the grantee's strengths and any issues that have arisen during the day.

- All other team members may provide input about a system, service, partnership, or the connections among the three.

Purpose of Each Team Meeting

The purpose of the first team meeting—usually conducted the Sunday evening prior to the team's Monday arrival at the grantee site—is to review planned activities and to ensure that all team members understand their respective roles and responsibilities and the team's common objectives. During the meeting conducted at the end of the second day on-site (i.e., Monday), reviewers process and analyze information gathered during the Entrance Meeting and other activities, including observations, interviews, and reviews of documents, and they begin developing a common understanding of the grantee's systems, services, and partnerships.

During the meetings conducted at the end of the third and fourth days on-site, the review team continues to process and analyze the data gathered through the PRISM review activities, including the focus child and family process. Such activities include document and file reviews, observations of center- and home-based activities, interviews, and completion of related checklists. During these meetings, reviewers share information, seek clarification, determine if assistance is needed, and they begin to conceptualize their recommendations for decisions regarding compliance.

The final team meeting conducted on the last full day on-site (i.e., Thursday) is dedicated to final analysis of the facts, followed by preliminary decisions from the team leader regarding grantee compliance and completion of the draft Head Start Review Report.

The Summary of Review Decisions Worksheet found in the Forms Appendix assists team leaders in tracking issues discussed during daily team meetings. More specifically, the form helps team leaders to organize shared information and follow-up items, and record recommended compliance decisions, including applicable citations and program strengths (as appropriate).

By the end of the final team meeting:

- Reviewers must complete recommendations on the grantee's strengths;

- Reviewers must recommend compliance decisions under each Core Question and cite evidence for each potential area of noncompliance;

- The team leader must make preliminary decisions regarding grantee compliance;

- All review team members must assist in writing the draft Head Start Review Report; and

- The team leader must determine the content of presentations (at the Summary Meeting).

Additional communication and coordination during reviews of grantees with delegates. If a review has multiple teams (i.e., "subteams") monitoring a variety of delegate agencies simultaneously, the team leader also must communicate and coordinate with the subteam leaders. Such practices ensure that each subteam can follow up on issues raised by other subteam(s). For example, if one subteam finds a lack of ongoing monitoring of one delegate agency's health services on the part of the grantee, the team leader can ask all other subteams to check on this issue in their delegate agencies.

GRANTEE BRIEFINGS

In addition to the ongoing dialogue that takes place among reviewers, grantee staff, and parents in connection with review activities, the team leader should frequently brief the grantee regarding review developments. Such briefings are helpful for several reasons. First, they provide opportunities to discuss the review observations to date. Second, they provide opportunities for the team leader to ask for clarification or seek additional information regarding problem areas. Third, they provide opportunities for the team leader to seek, and for the grantee to provide, feedback on review progress, logistics, potential problem areas, and other issues. Because the review is conducted as a partnership between the review team and the grantee, it is important that grantee staff be given regular opportunities to receive information about issues and concerns and to provide input about them. The team leader may choose to conduct these briefings alone with the grantee director or may invite team members to participate.

MAKING REVIEW DECISIONS

At the end of the data collection, verification, and analysis process, the team leader makes preliminary compliance decisions for each of the Core Questions, indicating whether there are (a) no areas of noncompliance or (b) areas of noncompliance. The following terms and criteria are used in making compliance decisions:

- **No areas of noncompliance** means that no instances of noncompliance were identified for the respective Core Question. That is, the evidence indicates that the grantee is meeting all program requirements relevant to the respective Core Question.

- **Areas of noncompliance** means that at least one instance of noncompliance requiring corrective action was identified for a Core Question. That is, the evidence indicates that the grantee is not meeting all program requirements relevant to the respective Core Question. Deficiency determinations are not made during the On-Site Activities phase,

but instead by the responsible HHS official or designee during the Grantee Notice and Program Improvement phase. If, however, in the course of conducting the On-Site Activities phase of the review, the team leader suspects that the grantee may have deficiencies, the team leader should notify his or her manager immediately while on-site. The manager may have suggestions for additional data to be gathered (e.g., people to interview, classrooms to observe, files to review) or actions to take (e.g., redirecting the focus of the team to the area of concern) to ensure that all facts relevant to the deficiency(ies) have been established. **The term "deficiency" must not be used in discussions with grantees or reviewers during the On-Site Activities phase of the review. In addition, the term "potential area of noncompliance" (instead of "area of noncompliance") should be used in discussions with grantees prior to developing the draft Head Start Review Report during the On-Site Activities phase of the review . (Once the draft Head Start Review Report has been developed, "potential areas of noncompliance" become "preliminary areas of noncompliance.")**

DEVELOPMENT OF THE DRAFT HEAD START REVIEW REPORT

The results of the review are compiled into a draft version of the Head Start Review Report, which is organized into three parts around the major areas of the Performance Standards: (1) Child Development and Health Services, (2) Family and Community Partnerships, and (3) Program Design and Management. In turn, each of these sections of the report has three parts, including the (1) Area Strengths, (2) Review Decisions, and (3) Areas of Noncompliance. A description of each of the sections is listed below. Beginning in FY 2005, the PRISM Software will incorporate into the Head Start Review Report data for both the grantee and its delegates, when present. For details, refer to the PRISM Software User Manual.

The draft Head Start Review Report does not include recommendations for quality improvement. Review team members must not provide recommendations for quality improvement or technical assistance at any time during any phase of the review or in the report.

Each review team member is accountable for the accuracy of the material he or she contributes to the report, whether that information is conveyed verbally (e.g., during team meetings or other discussions with review team members) or in writing (e.g., during a report writing session). The team leader is accountable for the content of the draft Head Start Review Report, and the responsible HHS official or designee is accountable for the content of the final Head Start Review Report.

In **drafting the Head Start Review Report**, reviewers, Report Coordinators, team leaders, and the responsible HHS official or designee must ensure that:

- **All assertions of fact include references to evidence sufficient to support the respective assertions;**

- **Specified areas of noncompliance (if any) are consistent with and supported by the facts;**

- **Specified areas of noncompliance (if any) are accompanied by applicable and accurate citations** (i.e., references to relevant program requirements), as well as the full text of the requirements;

- Required elements are easily identifiable in the descriptions of grantee strengths and areas of noncompliance, respectively; and

- The report is edited for clarity, tense (past), spelling, typographical errors, and incomplete sentences.

Area Strengths

Beginning in FY 2005, strengths within a content area will be described in the section of the review report called "Area Strengths" (formerly called "Area Summary"). Starting in FY 2005, the Area Strengths section will now include only information pertaining to any strengths identified in that content area without any information on areas of noncompliance as in previous years. If no strengths are identified in a particular content area, this section should be left blank.

Descriptions of program *strengths* in the Area Strengths section should:

1. Specify what the grantee is doing that constitutes a strength (i.e., topic sentence);

2. Describe the grantee service, partnership, process or procedure that constitutes the strength; and

3. Include one or more examples, as appropriate.

Note that instances in which a grantee is simply meeting the program requirements do not constitute a strength. Rather, a grantee strength is the provision of a service that extends above and beyond what is required or that constitutes an exemplary practice or model.

Review Decisions

For each Core Question, preliminary decisions of "no areas of noncompliance" or "areas of noncompliance" are made by the team leader, based on recommendations from review team

members. These decisions, generated automatically from the PRISM Software, are organized by Core Question in this section of the Head Start Review Report. Even though decisions are organized by Core Question, it is important to keep in mind that the Core Questions merely provide a framework for conceptualizing categories of program requirements. Specific compliance decisions (i.e., whether a grantee has "no areas of noncompliance" or one or more "areas of noncompliance" within a given Core Question) are made by assessing grantee compliance with all program requirements.

Areas of Noncompliance

When a program is not meeting a program requirement, the review team must write a description of the area of noncompliance within this section. When the failure to meet a respective service area or system area program requirement is not pervasive, the review may write a "stand-alone" area of noncompliance. When the failure to meet the program requirement(s) is pervasive and indicates underlying problems in one or more systems, the review team should write an area of noncompliance that identifies both the pervasive failure and its interrelationship to the underlying systems problem. Descriptions of both stand-alone areas of noncompliance and interrelated areas of noncompliance are described below.

Stand-Alone Areas of Noncompliance

Stand-alone descriptions of areas of noncompliance must contain the following elements:

1. Cite the program requirement. Include reference to the relevant citation (e.g., 1306.32) and the full text of the requirement.

2. Briefly describe why the grantee is out of compliance (i.e., topic sentence). A topic sentence:

   a. is a sentence that indicates the main idea of the paragraph.

   b. is the first sentence of the paragraph.

   c. substantiates or supports the intent of the program requirement.

3. Describe the evidence the team relied on in identifying the noncompliance:

   a. Include specific examples. Multiple examples should be provided whenever possible, and numbers used to quantify and demonstrate the size or pervasiveness of the problem.

   b. Describe the methodology used to gather data from the sources.

- A method is a procedure or process for attaining information, and a mode of inquiry.

- Types of methods include interviews, observations, and document review.

- Include multiple methods.

c. Describe the sources the team relied on in identifying the noncompliance.

- A source is a point of origin or procurement that supplies information.

- Types of sources include people, settings, and documents.

- Include multiple sources.

4. If the grantee is meeting some but not all program requirements, describe the difference between what is required and what the grantee is doing.

a. Provide enough detail to make clear how and to what extent the grantee's practice(s) differ(s) from the requirements.

b. Identify which practices, or absence of practices, fail to meet the requirements.

5. If a program requirement states that something specific must be in place (e.g., code of conduct), then stating that this did not occur is sufficient.

Interrelated Areas of Noncompliance

Interrelated Areas of Noncompliance are fundamentally similar to stand-alone areas of noncompliance. They contain the five elements listed above, but several of the elements include important differences, which are described below. In addition, several new elements are included. Interrelated Areas of Noncompliance may describe system-to-service interrelationships (i.e., a systems failure underlies a pervasive failure in service delivery) and system-to-system interrelationships (i.e., a systems failure underlies a pervasive failure in another system).

Descriptions of Interrelated Areas of Noncompliance must contain the following elements:

1. Cite both program requirements that are implicated. (It is possible for interrelated areas of noncompliance to include more than two citations. For purposes of this discussion, we will assume that only two citations - one in a service area and one in a systems area - are implicated.) Include references to the relevant citations (e.g., 1304.51(i)(2) and

1304.21(c)(1)(i)) and the full text of each of the requirements. In the PRISM Software, be sure to check each of the citations under its respective Core Question.

2. For each citation, briefly describe why the grantee is out of compliance (i.e., topic sentence). A topic sentence:

   a. is a sentence that indicates the main idea of the paragraph.

   b. is the first sentence of the paragraph.

   c. substantiates or supports the intent of the program requirement.

3. For each citation, describe the evidence the team relied on in identifying the noncompliance:

   a. Include specific examples. Multiple examples should be provided whenever possible, and numbers used to quantify and demonstrate the size or pervasiveness of the problem.

   b. Describe the methodology used to gather data from the sources.

   – A method is a procedure or process for attaining information, and a mode of inquiry.

   – Types of methods include interviews, observations, and document review.

   – Include multiple methods.

   c. Describe the sources the team relied on in identifying the noncompliance.

   – A source is a point of origin or procurement that supplies information.

   – Types of sources include people, settings, and documents.

   – Include multiple sources.

4. For each citation, if the grantee is meeting some but not all program requirements, describe the difference between what is required and what the grantee is doing.

   a. Provide enough detail to make clear how and to what extent the grantee's practice(s) differ(s) from the requirements.

b. Identify which practices, or absence of practices, fail to meet the requirements.

5. For each citation, if a program requirement states that something specific must be in place (e.g., code of conduct), then stating that this did not occur is sufficient.

6. For the area of noncompliance that is pervasive, describe the problem as pervasive and be sure to supply sufficient examples to support the statement (per item 3, above). For the area of noncompliance that describes an underlying system failure, describe how the system failure has contributed to the noncompliance in the service area. This narrative should appear under the Core Question where the appropriate system that is interrelated appears.

7. In addition to writing the Interrelated Area of Noncompliance, the review team should also develop Stand-alone Areas of Noncompliance for the original citation under the Core Question where it originally appears.

If an area of noncompliance is identified and the grantee takes appropriate corrective action and corrects the area of noncompliance during the On-Site phase of the review, the area of noncompliance must be written up and included in the draft Head Start Review Report. In addition to meeting all above requirements for writing areas of noncompliance, the description of such an area(s) of noncompliance should note that the grantee has already taken the necessary corrective action to resolve the issue.

Starting in FY 2005, a list of all of the citations constituting an area of noncompliance (or deficiency) for a specific Core Question will be automatically generated by the PRISM Software and placed at the end of that Core Question's Areas of Noncompliance section. Next to each citation will be the corresponding review decision - either "noncompliant" or "deficient."

For information regarding features in the PRISM Software that will assist with the development of the Head Start Review Report, refer to the PRISM Software User Manual, available at http://www.headstartreviews.com.

Report Coordinators

In general, Report Coordinators perform four tasks. The first task is to take notes, identifying important points from the group interviews, and sharing succinct notes with the review team. Second, Report Coordinators edit and consolidate, as necessary, the respective portions of the Head Start Review Report written by individual reviewers to ensure that the team leader has a

complete draft of the Head Start Review Report at the end of the review. In this capacity, they coach reviewers on elements of good writing and on the required elements for writing strengths and areas of noncompliance (as applicable). Report Coordinators might also write sections of the report. Third, they coordinate use of the laptop computers and provide technical support for the software. Fourth, they may engage in data-gathering activities, if requested by the team leader.

SUMMARY MEETING

Since FY 2004, the two events formerly referred to as the Final Grantee Briefing and Exit Meeting have been combined into one event called the Summary Meeting. The Summary Meeting allows the review team to give an overview of its preliminary conclusions in general terms. **The meeting must take place after the review team has completed the draft Head Start Review Report.** The grantee determines who will attend the meeting and advises the team leader.

The team leader closes the Summary Meeting with information regarding the next phase of the monitoring process—Grantee Notice and Program Improvement—indicating that the draft Head Start Review Report will be reviewed at the Regional Office and **the final Head Start Review Report and accompanying cover letter will be mailed to the grantee governing body president within 45 calendar days,** beginning the *first business day* of the end of the on-site review.[2]

When grantees have delegate agencies, the team leader works with the grantee director to determine the format of the Summary Meeting. In general, teams hold a separate Summary Meeting for each delegate. However, it is possible, especially when a grantee has only a few delegates, for the review team to present at a single meeting. When a grantee has many delegates, it is possible to hold a Summary Meeting for the grantee after the Summary Meetings for the delegate agencies have been conducted, allowing more time for the team leader to consolidate the results across multiple delegates.

DOCUMENTATION OF REVIEW ACTIVITIES

As reviewers collect information during the On-Site Activities phase of the review, they must take comprehensive notes—either directly on the various checklists, observation forms, and interview protocols—or on their own notebook paper. On the last day of the On-Site Activities phase of the review, reviewers are required to initial and date each page of their handwritten

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[2]   The Head Start Program Performance Standards require that the grantee be notified "promptly" in writing of any noncompliance or deficiency (see 45 CFR 1304.61(a) and 45 CFR 1304.60(b), respectively). For this reason, delivery of the final Head Start Review Report within 45 calendar days of the end of the on-site phase of the review is imperative.

notes and turn these in to the team leader. Similarly, all checklists, observation forms, and interview guides that include comments written during the On-Site Activities phase of the review must be initialed and dated and given to the team leader. This serves as an official record of data-collection activities. Given the important nature of these notes, reviewers must be diligent in their note-taking during the On-Site Activities phase of the review, documenting relevant details of all review activities in which they participated, including identifying who they interviewed, what they observed, and what files they reviewed.

NOTE TO TEAM LEADERS: Data from the Income Eligibility Data Collection Forms will need to be reported to the Head Start Bureau as part of the monitoring data. Details on compiling and transmitting this information will be forthcoming.

Grantee Notice and Program Improvement

After completion of the On-Site Activities phase, the PRISM review enters its final phase, Grantee Notice and Program Improvement. Depending upon the results of the review, this phase encompasses up to three activities conducted by the responsible HHS official or designee:

- Finalizing compliance decisions;

- Finalizing the Head Start Review Report and cover letter; and

- Assisting the grantee in obtaining access to training and technical assistance (T/TA), reviewing and approving Quality Improvement Plans (QIPs), as applicable, and ensuring resolution of all areas of noncompliance and/or deficiency determination(s).

GRANTEE NOTICE

Grantee notice activities include finalizing compliance decisions and finalizing the Head Start Review Report and cover letter. These activities are described below.

Finalizing Review Decisions

The final Head Start Review Report and the cover letter together notify the grantee of all final decisions regarding compliance, including identification of any areas of noncompliance, determinations of deficiency, and any requirements for corrective action, as applicable. Authority to finalize these decisions resides with the responsible HHS official or designee as articulated within relevant provisions of the Performance Standards, which are identified below.

Areas of Noncompliance. The Performance Standards specify authority to identify areas of noncompliance and subsequent requirements to notify the grantee as follows:

> If the responsible HHS official, as a result of information obtained from a review of an Early Head Start or Head Start grantee, determines that the grantee is not in compliance with

Federal or State requirements (including, but not limited to, the Head Start Act or one or more of the regulations under parts 1301, 1304, 1305, 1306, 1308 or 1310 of this title) in ways that do not constitute a deficiency, he or she will notify the grantee promptly, in writing, of the finding, identifying the area or areas of noncompliance to be corrected and specifying the period in which they must be corrected.[1]

Deficiencies. The Performance Standards specify authority to make deficiency determinations and subsequent requirements to notify the grantee as follows:

If the responsible HHS official, as a result of information obtained from a review of an Early Head Start or a Head Start grantee, determines that the grantee has one or more deficiencies, as defined in Sec. 1304.3(a)(6) of this part, and therefore also is in violation of the minimum requirements as defined in Sec. 1304.3(a)(14) of this part, he or she will notify the grantee promptly, in writing, of the finding, identifying the deficiencies to be corrected and, with respect to each identified deficiency, will inform the grantee that it must correct the deficiency either immediately or pursuant to a Quality Improvement Plan.[2]

The Performance Standards define a deficiency as follows:

(i) *An area or areas of performance in which an Early Head Start or Head Start grantee agency is not in compliance with State or Federal requirements, including but not limited to, the Head Start Act or one or more of the regulations under parts 1301, 1304, 1305, 1306, 1308 or 1310 of this title, and which involves:*

    (A) *A threat to the health, safety, or civil rights of children or staff;*

    (B) *A denial to parents of the exercise of their full roles and responsibilities related to program governance;*

    (C) *A failure to perform substantially the requirements related to Early Childhood Development and Health Services, Family and Community Partnerships, or Program Design and Management; or*

    (D) *The misuse of Head Start grant funds.*

(ii) *The loss of legal status or financial viability, as defined in part 1302 of this title, loss of*

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[1] 45 CFR 1304.61(a). The reference to transportation regulations (i.e., 1310) does not appear in the original and was added here.

[2] 45 CFR 1304.60(b).

permits, debarment from receiving Federal grants or contracts or the improper use of Federal funds; or

(iii) Any other violation of Federal or State requirements including, but not limited to, the Head Start Act or one or more of the regulations under parts 1301, 1304, 1305, 1306, 1308 or 1310 of this title, and which the grantee has shown an unwillingness or inability to correct within the period specified by the responsible HHS official, of which the responsible HHS official has given the grantee written notice of pursuant to section 1304.61.[3]

Specifically, as noted in 45 CFR 1304.3(a)(6)(i)(C), the difference between an area of noncompliance and a deficiency is a matter of level of significance.[4] The responsible HHS official or designee determines whether a specific grantee has one or more deficiencies based on the relevant facts established during the grantee's review.

Finalizing the Head Start Review Report and Cover Letter

The development of the final Head Start Review Report and cover letter, which communicate review findings and specify any requirements for correction action, are described separately below.

Finalizing the Head Start Review Report. The responsible HHS official or designee must ensure the draft Head Start Review Report is finalized as soon as possible after the final compliance decisions have been made. The responsible HHS official or designee must also ensure the final Head Start Review Report is prepared using the PRISM Software. The final report must be organized in the same manner as the draft report. Starting in FY 2005, a list of all the citations will be generated in the Head Start Review Report. Next to each citation will be the corresponding review decision- either "noncompliant" or "deficient" as noted in the PRISM Software. **The responsible HHS official or designee must ensure that:**

- **All assertions of fact include references to evidence sufficient to support the respective assertions;**

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[3] 45 CFR 1304.3(a)(6). The reference to transportation regulations (i.e., 1310) does not appear in the original and was added here.

[4] In the Preamble to the Final Rule (Federal Register, 1996), the Administration for Children and Families notes that "a determination that a grantee is out-of-compliance with one or more requirements will not, in and of itself, constitute a deficiency. Rather, these areas of noncompliance must be of a level of significance that results in the failure of the grantee to substantially provide required services or to substantially implement required procedures. As used… the term 'substantially' does not necessarily mean that a majority of the requirements are not being met but, rather, that a knowledgeable person reviewing the findings would determine that the grantee agency is not operating a quality program."

- **Specified areas of noncompliance (if any) are consistent with and supported by the facts;**

- **Specified areas of noncompliance (if any) are accompanied by applicable and accurate citations** (i.e., references to relevant program requirements), as well as the full text of the requirements;

- Required elements are easily identifiable in the descriptions of grantee strengths and areas of noncompliance, respectively; and

- The report is edited for clarity, tense (past), spelling, typographical errors, and incomplete sentences.

Cover Letter. Beginning in FY 2005, the web-based PRISM Software will support the generation of cover letters (with the exception of follow-up review and notice of termination cover letters) to be sent to the grantee accompanying the Head Start Review Report. In addition to overseeing the preparation of the Head Start Review Report, the responsible HHS official or designee must also oversee the generation of an appropriate cover letter. (For specific details on software functionality see the PRISM Software User Manual.) Since, the cover letter, along with the Head Start Review Report, constitutes legal notice to the grantee of any areas of noncompliance and determinations of deficiency, the responsible HHS official or designee should ensure the following:

All cover letters must:

- Be dated (i.e., the date the letter is mailed), addressed to the grantee governing body president, and include the grantee name and grant number. The letter must make reference to the dates of the review and identify all programs monitored (i.e., Head Start and/or Early Head Start) and should describe the purpose of monitoring reviews and the authority for conducting such reviews. Finally, the letter must specify the individual to contact with questions or for assistance.

For grantees found to have one or more areas of noncompliance, the cover letter must:

- Identify the area or areas of noncompliance to be corrected, referring the grantee to the Head Start Review Report for references to the specific program requirements;[5]

- Specify a timeframe(s) for making the correction(s);[6]

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[5] For guidance on citing areas of noncompliance properly, see Development of the Draft Head Start Review Report section within the On-Site Activities chapter.

[6] 45 CFR 1304.61(a).

- Specify the mechanism(s) to be employed for certifying compliance (e.g., grantee letter certifying compliance, follow-up visit); and

- Advise the grantee that failure to correct the area(s) of noncompliance within the specified period will result in a determination of the grantee having a deficiency(ies),[7] which, if left uncorrected, will lead to termination of the grant or denial of refunding.[8]

For grantees determined to be in deficient status, the cover letter must:

- Include the definition of a deficiency contained in the Performance Standards (i.e., 45 CFR 1304.3(a)(6) et seq.);

- Cite the part(s) of the definition of a deficiency that apply (e.g., 45 CFR 1304.3(a)(6)(i)(A)). If the deficiency consists of a failure to perform substantially the requirements related to Early Childhood Development and Health Services, Family and Community Partnerships, or Program Design and Management (i.e., 45 CFR 1304.3(a)(6)(i)(C)), the cover letter must specify the content area in which the deficiency is found;

- Cite the program requirements for which the grantee is out of compliance (i.e., areas of noncompliance) that, collectively, constitute the deficiency;

- Identify any area or areas of noncompliance to be corrected that are unrelated to the deficiency (if any), referring the grantee to the Head Start Review Report for references to the specific program requirements;

- Specify for each deficiency the timeframe for correction (not to exceed 1 year from the date the grantee receives official notification of the deficiency);[9]

- Specify the requirements for and requested timeframe for developing, submitting, and receiving approval for a Quality Improvement Plan (QIP), if applicable;[10]

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[7] 45 CFR 1304.61(b).

[8] 45 CFR 1304.60(f).

[9] Sec. 641A(d)(2)(A) of the Head Start Act.

[10] 45 CFR 1304.60(b).

- Specify the mechanism(s) to be employed for certifying compliance (i.e., follow-up review); and

- Notify the grantee that failure to correct the deficiency(ies) within the specified timeframe will result in grant termination or denial of refunding.[11]

The final Head Start Review Report and accompanying cover letter must be mailed to the grantee governing body president within 45 calendar days, beginning the *first business day* of the end of the on-site review.[12] **On the same day these documents are mailed to the grantee, a copy of the report and cover letter must be mailed to:**

- **The Policy Council Chairperson;**

- **The Executive Director;**

- **The Head Start Director;**

- **Paul Blatt, Head Start Bureau Monitoring Lead;**

- **DANYA International (Attn: Monitoring Support Contract); and**

- **The Regional Office T/TA Coordinator.**

A copy must also be given to the grantee's Program Specialist and the review team leader. Review team members may request a copy of the Head Start Review Report for any reviews on which they participated by submitting such a request to Steve Martin at smartin@danya.com.

The responsible HHS official or designee must verify that the report and accompanying cover letter are received by the grantee, regardless of the decisions regarding compliance, using the least costly mechanism to confirm receipt (e.g., return receipt on regular mail).

For grantees with no determinations of deficiency and no areas of noncompliance, the Grantee Notice and Program Improvement phase of the review concludes with the delivery of the final Head Start Review Report and cover letter. For grantees with final compliance decisions that

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[11]   45 CFR 1304.60(f).

[12]   The Head Start Program Performance Standards require that the grantee be notified "promptly" in writing of any noncompliance or deficiency (see 45 CFR 1304.61(a) and 45 CFR 1304.60(b), respectively). For this reason, delivery of the final Head Start Review Report within 45 calendar days of the end of the on-site phase of the review is imperative.

identify one or more areas of noncompliance or include one or more deficiency determinations, program improvement activities begin, which are described below.

PROGRAM IMPROVEMENT

Program improvement activities, which are applicable to grantees with deficiency(ies) and/or areas of noncompliance, include engaging the training and technical assistance (T/TA) system to ensure that grantees have the support needed to facilitate improvement, reviewing and approving the Quality Improvement Plan (QIP), and monitoring resolution of each noncompliance and deficiency, as applicable.

Grantees With Areas of Noncompliance

The responsible HHS official or designee must ensure that all areas of noncompliance are corrected within the specified period. In ensuring that areas of noncompliance have been corrected fully and in a timely fashion, the responsible HHS official or designee may request from the grantee a letter certifying that any areas of noncompliance, as specified in the final Head Start Review Report and cover letter, have been corrected and specifying the date(s) of such correction. The responsible HHS official or designee may direct that one or more follow-up visits be conducted to verify full and timely correction in the place of or in addition to the letter of certification. A grantee that is unable or unwilling to correct the specified areas of noncompliance within the prescribed time period will be judged to have a deficiency that must be corrected, either immediately or pursuant to a Quality Improvement Plan (see 45 CFR 1304.3(a)(6)(iii) and 45 CFR 1304.60).[13]

Grantees With Deficiencies

The Head Start Act requires the Federal government to make available training and technical assistance to grantees with deficiencies, as feasible and appropriate, to assist in the development and implementation of QIPs.[14]

Quality Improvement Plans

The requirements for developing a QIP are specified in the Head Start Act as follows:

An Early Head Start or Head Start grantee with one or more deficiencies to be corrected under a Quality Improvement Plan must submit to the responsible HHS official a Quality Improvement Plan specifying, for each identified deficiency, the actions that the grantee will take to correct the deficiency and the timeframe within which it will be corrected. In no case can the timeframes proposed in the Quality Improvement Plan exceed 1 year from the date that the grantee received official notification of the deficiencies to be corrected.[15]

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[13] 45 CFR 1304.61(b).

[14] 42 USC 9836(a)(d)(3).

[15] 42 USC 9836(d))(2)(A).

To expedite the development of the QIP, the responsible HHS official or designee may ask the grantee to provide drafts so the official can provide immediate feedback. Responsibilities of the responsible HHS official or designee in reviewing a QIP are specified in the Performance Standards as follows:

> *Within 30 days of the receipt of the Quality Improvement Plan, the responsible HHS official will notify the Early Head Start or Head Start grantee, in writing, of the Plan's approval or specify the reasons why the Plan is disapproved.*[16]

For disapproved plans, the grantee must revise and resubmit the QIP. Resubmission requirements are specified in the Performance Standards as follows:

> *If the Quality Improvement Plan is disapproved, the Early Head Start or Head Start grantee must submit a revised Quality Improvement Plan, making the changes necessary to address the reasons that the initial Plan was disapproved.*[17]

Follow-up Reviews

If a grantee fails to meet applicable program requirements after a full triennial, full first year, or other Head Start review has been conducted, a follow-up review may be scheduled at the discretion of the responsible HHS official or designee. An on-site follow-up monitoring review must be conducted for all grantees that are determined to have deficiencies. The purpose of a follow-up review is to determine whether a grantee is in compliance with the applicable program requirements that were found to be out of compliance during the initial review. Follow-up reviews may also identify new areas of noncompliance and deficiencies that were not identified in the original review report. This information must be included in the follow-up review report.

All applicable program requirements and written narratives from the original review report must remain in the follow-up review report. Beginning in FY 2005, the PRISM Software will automatically import into the follow-up report the contents of the original Head Start Review Report. Additionally, the follow-up review report is to include an updated narration for each applicable standard cited in the original review report that states whether or not the grantee is now in compliance, as well as the methods and sources used to make that determination. The follow-up report must be entered into the PRISM Software.

Any area of noncompliance that was not initially identified as a deficiency that remains uncorrected within the timeframe specified by the responsible HHS official or designee will

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[16] 45 CFR 1304.60(d).

[17] 45 CFR 1304.60(e).

then be determined to be a deficiency. If a grantee fails to correct a deficiency the responsible HHS official or designee will issue a letter of termination or denial of refunding.

More details on the follow-up review process are outlined below.

The responsible HHS official or designee must ensure that prompt return visits to grantees with one or more deficiency determinations are conducted to confirm the full and timely correction of such deficiencies.[18] Immediately after the QIP is approved with a designated timeframe for correction, the responsible HHS official or designee must ensure the scheduling of the follow-up review, which must occur within a few days of the end of the QIP period. If a grantee has more than one deficiency, and the deficiencies have different end dates, the team leader may organize multiple follow-up visits.

Team leaders may choose to conduct an interim visit, if resources allow. If possible, this visit should coincide with a governing body meeting to ensure that the governing body is fully engaged in resolving the deficiency. This visit provides the responsible HHS official or designee with information on progress and the grantee with a midcourse correction, if one is needed. If the grantee had areas of noncompliance that were not a part of the deficiency(ies), this visit also provides an opportunity to verify that those have been corrected. If the areas of noncompliance have not been corrected after the identified correction periods have expired, they become a deficiency(ies).[19]

In building the team to conduct the follow-up review, team leaders need only identify reviewers with expertise relevant to the issues identified in the Head Start Review Report and cover letter as contributing to the deficiency and areas of noncompliance, if applicable. The team leader must ensure that follow-up team members are properly credentialed, should it be necessary to proceed toward termination. The team leader should select the follow-up team using the same procedure used in the initial team selection (i.e., the team leader requests reviewers by expertise, and the Regional Review Coordinator assembles the team).

Prior to meeting with the grantee, the team leader should ensure that all review team members have read the respective Head Start Review Report, cover letter, and the QIP and that each team member understands the contents of the documents and the purpose and objectives of the follow-up review.

In making a preliminary determination regarding deficiency status (i.e., corrected or not corrected) at the conclusion of the follow-up visit, the team leader must refer to the requirements specified in the cover letter and the Head Start Review Report. During the

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[18]   42 USC 9836a(c)(1)(C).

[19]   45 CFR 1304.3(a)(6)(iii).

conduct of the follow-up visit, the team leader should direct review team members to gather sufficient evidence (e.g., through document and file reviews, interviews with grantee management and staff, and observation of operations) to determine whether the deficiency has been corrected. This is critical; while a grantee may have implemented all actions identified in the QIP, the deficiency is corrected only if the grantee has complied with all requirements specified in the Head Start Review Report and cover letter.

Final determination regarding the status of a deficiency(ies) is made by the responsible HHS official or designee. For grantees with deficiencies judged to have been corrected, the Grantee Notice and Program Improvement phase ends (notwithstanding any outstanding areas of noncompliance) with the correction of the deficiency(ies). The Performance Standards specify that for grantees with deficiencies judged to persist beyond the specified period, the responsible HHS official or designee must terminate the grant or deny refunding.[20]

Tracking Resolution During the Specified Correction Period

It is mandatory that the responsible HHS official or designee track corrective action and program improvement activities for grantees with areas of noncompliance and/or deficiency(ies) within the PRISM Software. The software tracks information on the QIP submission, approval, and correction process. Beginning in FY 2005, the responsible HHS official or designee must generate a follow-up report upon receipt and approval of a letter certifying compliance. In this follow-up report, the responsible HHS official or designee should clear all corrected areas of noncompliance identified within the letter of certification.

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[20]   45 CFR 1304.60(f).

PRISM

*Program Review Instrument for Systems Monitoring
of Head Start and Early Head Start Grantees*
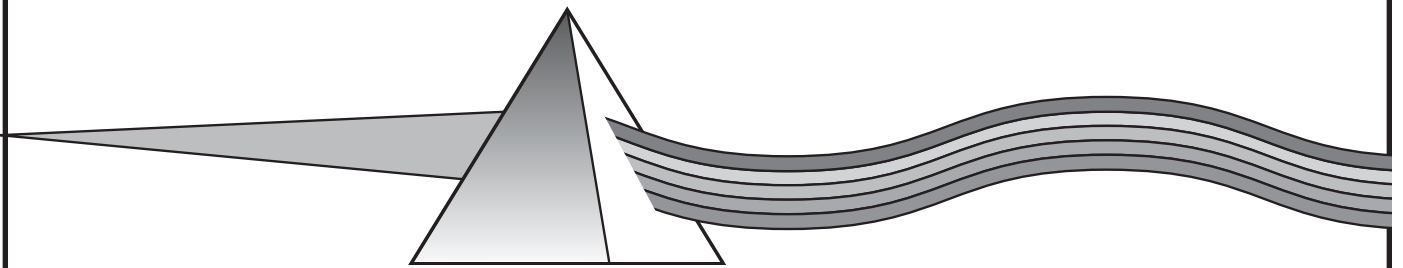
All Instruments
2005

PRISM Instrument
(Appendix I)

Core Questions

These 18 Core Questions guide reviewers through the Head Start Program Review Instrument for Systems Monitoring (PRISM) review process. Each reviewer has responsibility for providing input on these Core Questions. Review decisions for each question are made through team discussion, with the final decision by the team leader. Reviewers need to rely on their own information and information collected by others.

There is a page devoted to each Core Question. The Core Question is at the top of each page, and to the right of the Core Question are the specific citations—the Performance Standards and other regulations—included in, or represented by that Core Question. Beneath the Core Question are several bulleted items. The bullets at the bottom of each page suggest data collection methods for that particular Core Question.

- First, they ask reviewers to refer to pertinent information gathered during various parts of the review;

- Next, they tell reviewers what to observe;

- Third, they tell reviewers which Head Start staff, parents, and community members may need to be interviewed; and

- Finally, they indicate which documents and materials are pertinent for the review.

Reviewers can take notes on the page facing each Core Question. The notes should be clear, since they will be submitted to the team leader at the end of the review.

WHAT'S NEW IN 2005?

Each Core Question and its corresponding notes page have been revised so they appear back-to-back on the same page. OMB Circular citations have been added to Core Question 8 (Fiscal Management).

EFFECTIVENESS OF SYSTEMS	IMPLEMENTATION OF SERVICES AND PARTNERSHIPS								
	Child Development and Health Services					Family and Community Partnerships			Program Design
	Prevention & Early Intervention	Individu-alization	Disabilities Services	Curriculum and Assessment	Child Outcomes	Family Partnership Building	Parent Involvement	Community Partnerships	Facilities, Materials, Equipment, and Transportation
Program Governance									
Planning									
Communication									
Record-Keeping & Reporting									
Ongoing Monitoring									
Self-Assessment									
Human Resources									
Fiscal Management									
Eligibility, Recruitment, Selection, Enrollment, and Attendance									

QUESTION 1. PROGRAM GOVERNANCE	STANDARDS
How effective is the grantee's system of shared governance in supporting the implementation of quality services to children and families? How does the system ensure: • a governing body that participates in key decision-making and oversight for the program, including the formation of the Policy Council structure and function? • a formal structure of policy groups and Parent Committees with appropriate composition and process of formation? • the assignment of appropriate governing body and policy group responsibilities, including the development, review, and approval/disapproval of program policies and procedures? • written internal dispute resolution procedures for conflicts between the governing body and policy group? • inclusive and well-functioning Parent Committees?	1304.50, including Appendix A—Governance and Management Responsibilities; 1304.52 (k)

• *REFER TO*—Information on governance gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

• *OBSERVE*—Policy Council meeting.

• *INTERVIEW*—As needed, any additional governing body and policy group members, and staff.

• *REVIEW*—Policies and procedures pertaining to governance; written definitions of roles and responsibilities of governing body members; evidence of training; governing body and Policy Council bylaws; selection of minutes of governing body, Policy Council, Policy Committee, and Parent Committee meetings; and grantee and delegate agency agreements (if applicable).

Question 1. **Program Governance. How effective is the grantee's system of shared governance in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 2. PLANNING	STANDARDS
How effective is the grantee's ongoing system of program planning in supporting the implementation of quality services to children and families?	1304.51(a); 1305.3; 1306.30(a); 1306.30(d); 1306.31–1306.36; 1308.4

How does the system ensure:

- a community assessment that is used for program planning, including selection of appropriate program options?

- consultation with the grantee's governing body, policy groups, staff, and other community organizations?

- long-range goals and short-term program and financial objectives that address the findings of the community assessment, are consistent with the philosophy of Head Start, and reflect the findings of ongoing monitoring and the self-assessment?

- written plan(s) for implementing quality services for children and families, and supporting pregnant women as appropriate, that result in positive outcomes and are reviewed, revised, and updated as needed?

- *REFER TO*—Information on planning gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, any additional staff, governing body members, or parents as to their involvement in and knowledge of the program's planning process.

- *REVIEW*—The community assessment, statement of long-range goals and short-term objectives, decision-making about program options, and written plan(s).

Question 2. **Planning. How effective is the grantee's ongoing system of program planning in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 3. COMMUNICATION	STANDARDS
How effective is the grantee's communication system in supporting the implementation of quality services to children and families? How does the system ensure: • effective communication between staff and parents, carried out on a regular basis throughout the program year and in the primary or preferred language of parents? • that required information is shared among staff, the governing body, and policy group? (This information includes reports; HHS policies, guidelines, and communication; and program plans, policies, procedures, and grant applications.) • that delegate agency governing bodies, Policy Committees (when applicable), and staff receive all regulations, policies, and other pertinent communication in a timely manner? • strong communication, cooperation, and information sharing among agencies and their community partners (e.g., LEA or Part C agency, child care providers, etc.)? • regular communication among all staff?	1304.20(c)(1); 1304.22(a)(4); 1304.22(b)(3); 1304.41(a)(1); 1304.51(b)–1304.51(f); 1308.4(l)

• *REFER TO*—Information on communication gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

• *OBSERVE*—Focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

• *INTERVIEW*—As needed, any additional staff, parents, delegate agency staff, and community partners regarding the quality and extent of communication in the program.

• *REVIEW*—Examples of written communication among staff, such as minutes of meetings, reports, and memos; policies and procedures pertaining to communication; examples of written communication between the program and families, the program and its governing body and policy groups, and the program and child care and community partners; and examples of minutes of governing body and policy group meetings.

Question 3. **Communication. How effective is the grantee's communication system in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 4. RECORD-KEEPING AND REPORTING	STANDARDS

How efficient and effective are the record-keeping and reporting systems in providing accurate, confidential, and timely information regarding children, families, and staff and in supporting quality services?

How are the record-keeping and reporting systems used to manage data and generate status reports that:

- identify and report program progress toward goals and objectives, and result in revised plans for the implementation of services as necessary?

- provide information on preschool children's progress?

- control program quality and maintain program accountability?

- advise Federal staff, governing bodies, policy groups, and staff of progress in implementing services?

- identify and report child abuse and neglect in compliance with applicable State and local laws?

STANDARDS: 1301.30; 1304.20(e)(5); 1304.22(c)(3)–1304.22(c)(5); 1304.51(g)–1304.51(h); 1304.52(k)(3)(i); 1308.4(l); 1308.6(e)(4)

- *REFER TO*—Information on record-keeping and reporting gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, program management personnel about what kinds of data are collected, how data are organized, and what reports are prepared; and policy group members and members of the governing body about the extent and quality of reporting.

- *REVIEW*—Program policies and procedures pertaining to confidentiality; files of focus children and families (including assessment data); a selection of status reports; and a selection of reports for the governing body, policy group(s), and staff.

Question 4. **Record-Keeping and Reporting. How efficient and effective are the record-keeping and reporting systems in providing accurate, confidential, and timely information regarding children, families, and staff and in supporting quality services?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 5. ONGOING MONITORING

How effective is the grantee's ongoing monitoring system in supporting the implementation of quality services to children and families?

How does the system ensure:

• the ongoing implementation of Federal regulations, including the analysis and use of data contained in written reports, tracking systems, and the on-site observation and supervision of staff?

• ongoing monitoring to ensure tracking of patterns of progress and accomplishments for groups of children in learning and development, as well as in health and disabilities services and family and community partnerships?

• effective oversight of the delegates' ongoing implementation of the Performance Standards and other Federal regulations, when applicable?

• *REFER TO*—Information on ongoing monitoring gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

• *OBSERVE*—Centers and/or family child care homes and focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

• *INTERVIEW*—As needed, program management personnel and any additional staff to determine the implementation of a monitoring process within the grantee and any delegate agencies.

• *REVIEW*—Program policies and procedures pertaining to ongoing monitoring; any written documentation of periodic monitoring activities, including reports to any delegate agencies; the Transportation Services Checklist; and the Health and Safety Checklist.

Question 5. **Ongoing Monitoring. How effective is the grantee's ongoing monitoring system in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 6. SELF-ASSESSMENT	STANDARDS

How effective is the grantee's approach to self-assessment in supporting the implementation of quality services to children and families?

1304.51(i)(1)–1304.51(i)(3)

How does the system ensure that:

- the self-assessment examines the effectiveness and progress in meeting the grantee's goals and objectives and the implementation of Federal regulations?

- the process involves policy groups, parents, and as appropriate, other community members?

- the grantee analyzes the results of the self-assessment and uses the information to address continuous improvement and to inform the grantee's planning process?

- *REFER TO*—Information on self-assessment gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, program management personnel, policy group members, and staff or governing body members regarding their involvement in the self-assessment process, its results, and any actions taken in response to the results.

- *REVIEW*—The annual self-assessment data and analysis, including progress toward meeting program goals and objectives and the implementation of Federal regulations.

Question 6. **Self-Assessment. How effective is the grantee's approach to self-assessment in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 7. HUMAN RESOURCES	STANDARDS

How effective is the grantee's human resources management system in supporting the implementation of quality services to children and families?

How does the system ensure that:

- the organizational structure supports the accomplishment of the grantee's goals and objectives?

- all required functions (e.g., management, content area experts, etc.) are appropriately assigned?

- there are adequate provisions for staff supervision and support, including annual performance appraisals?

- all staff are qualified for their positions?

- services for children meet the staffing requirements set out in the Performance Standards?

- appropriate standards of conduct are delineated and followed?

- staff do not pose a significant risk to the health and safety of children and families?

- the training and development system provides a structured approach to assisting staff, governing body members, Policy Council members, and volunteers in acquiring or increasing the knowledge and skills needed to fulfill their job responsibilities, including the areas of child abuse and neglect, transportation, and transitions?

Standards column:
1301.31, including Appendix A—Identification and Reporting of Child Abuse and Neglect; 1304.24(a)(2)–1304.24(a)(3); 1304.52; 1306.20–1306.23; 1308.4(e); 1308.4(k); 1310.16–1310.17

- *REFER TO*—Information on human resources management gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, program management personnel, policy group members, volunteers, and staff to clarify position assignments, the staff appraisal process, and training and development activities.

- *REVIEW*—Program personnel policies, a set of teacher files to check for the status of CDA and progress towards obtaining 2-year and 4-year degrees, a set of staff files to check for written documentation on staff background and qualifications, initial employment information and performance appraisals, the Transportation Services Checklist, written documentation on professional development and training opportunities, and any written information on staff-child ratios.

Question 7. **Human Resources. How effective is the grantee's human resources management system in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 8. FISCAL MANAGEMENT	STANDARDS

How effective is the fiscal management system in supporting the implementation of quality services to children and families?

How does the system ensure that:

- Federal regulations regarding fiscal management are met?

- the budget is developed and approved to support program goals and objectives?

- expenditures are monitored and analyzed and the budget is revised to ensure fiscal and program accountability?

- status reports reflect the appropriate use of funds to support quality services?

STANDARDS:
1301.10–1301.13, (Subpart B); 1301.20–1301.21, (Subpart C); 1301.32–1301.33; 1304.20(c)(5); 1304.23(b)(1)(i); 1304.50(f); 1304.50(g)(2); 1304.51(h)(1)–1304.51(h)(2); 1304.52(d)(8); 1305.9; 1308.4(m)–1308.4(o); 1310.23(b); Part 74, Subpart C; Part 92, Subpart C; OMB Circular A-21; OMB Circular A-87; OMB Circular A-110; OMB Circular A-122; OMB Circular A-133

- *REFER TO*—Information on fiscal management gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, the fiscal officer regarding the system of fiscal management and program management, governing body members, and policy group members about their involvement in fiscal management of the program.

- *REVIEW*—Items listed on Fiscal Checklist.

Question 8. **Fiscal Management. How effective is the fiscal management system in supporting the implementation of quality services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 9A. PREVENTION AND EARLY INTERVENTION	STANDARDS

How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist?

How does the grantee ensure that:

- parents are involved as full partners in prevention and early intervention?

- children and families are linked to an ongoing source of continuous, accessible health care; children are kept up-to-date on a schedule of well-child care that includes immunizations; and all timeframes are met?

1304.20; 1304.21(c)(1)(iii);
1304.22–1304.24; 1304.40(c)(1)(i)–(iii);
1304.40(c)(2); 1304.40(f);
1304.41(a)(2); 1304.41(b);
1304.53(a)(6); 1304.53(a)(8);
1304.53(a)(10)(i)–1304.53(a)(10)(iii);
1304.53(a)(10)(v)–1304.53(a)(10)(xvii);
1306.30(c); 1306.33(c)(3); 1308.6;
1308.20; 1310.21

- the health and safety of children is assured through (1) teaching children and parents preventive health practices; (2) the establishment and practice of effective health emergency procedures, including methods or handling suspected or known child abuse; (3) conditions for short-term exclusion and admittance; (4) medication administration procedures; (5) injury prevention measures; and (6) hygiene procedures?

- nutritional services meet all applicable laws; staff and families work together to identify and meet children's nutritional needs; meals are served family style and include a variety of foods, taking into account cultural and ethnic preferences; and nutrition education is provided for children and families?

- pregnant women enrolled in EHS are assisted in accessing prenatal and postpartum care and are provided with prenatal education?

- a regular schedule of on-site consultation by a mental health professional supports parent and staff efforts to address children's needs in a timely manner?

- developmental screening plays a role in child development and health services planning for children?

- *REFER TO*—Information on prevention and early intervention gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, and Community Partnerships Interview.

- *OBSERVE*—Centers and/or family child care homes and focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments; food preparation and storage; food transportation, if applicable; and meal and snack time.

- *INTERVIEW*—As needed, health, nutrition, and mental health services staff and consultants; staff involved in food services and nutrition education activities; Health Services Advisory Committee members; and community partners about prevention and early intervention in the program.

- *REVIEW*—Focus children's files for results from developmental screenings; health records; health- and safety-related policies and procedures; results from environmental tests, if applicable; menus; plans for health and safety activities; the Transportation Services Checklist; Health Services Advisory Committee meeting minutes; the program's plan for early childhood development and health services; and the Health and Safety Checklist.

Question 9a. **Prevention and Early Intervention. How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 9B. HEALTH CARE TRACKING AND FOLLOW-UP	STANDARDS

How does the grantee track the provision of all child health and developmental services and ensure that follow-up services are received in a timely manner?

1304.20(c)–1304.20(f); 1304.41(a)(1); 1304.51(g); 1308.18

How does the grantee ensure that:

- mechanisms are in place that support communication among staff, parents, and community providers to assure follow-up services are received?

- all confidentiality requirements are met and those who need information can access it?

- *REFER TO*—Information on tracking and follow-up of health services gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, and Family Group Interview.

- *INTERVIEW*—As needed, staff responsible for overseeing tracking of child health and development, teachers and/or home visitors, and parents about how the program tracks and provides follow-up on child health and development concerns.

- *REVIEW*—Health tracking system and its relationship to the grantee's record-keeping and reporting system (Core Question #4).

Question 9b. **Health Care Tracking and Follow-up. How does the grantee track the provision of all child health and developmental services and ensure that follow-up services are received in a timely manner?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 10. INDIVIDUALIZATION	STANDARDS
How does the grantee individualize the program of child development and health services to meet each child's unique characteristics, strengths, and needs, as determined in consultation with the family? How does the grantee ensure that: • individualization is based on the results of ongoing child assessment linked to curriculum goals and reflected in the program's curriculum, planning, record-keeping, and family partnership process? • individualization addresses child interests, learning and development, temperament, language, cultural background, and learning style?	1304.20(d); 1304.20(f); 1304.21(a); 1304.21(b); 1304.21(c)(1)(i); 1304.23(b)(1); 1304.40(a)(2); 1308.19

- *REFER TO*—Information on individualization gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, and Family Group Interview.

- *OBSERVE*—Focus children's settings for evidence of individualization of the curriculum based on the ongoing assessment information using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

- *INTERVIEW*— Teachers and/or home visitors, family child care teachers, and parents of the focus children about how the program individualizes services, using information gathered from the ongoing assessment of children.

- *REVIEW*—Written curriculum, periodic recordings of each child's developmental progress, and the program's plan for services for children.

Question 10. **Individualization. How does the grantee individualize the program of child development and health services to meet each child's unique characteristics, strengths, and needs, as determined in consultation with the family?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 11. DISABILITIES SERVICES	STANDARDS

How does the grantee ensure that individualized services are effectively provided to children with diagnosed or suspected disabilities?

How does the grantee:

- ensure the timely assessment of special education/related services needs of children with disabilities, conducted in coordination with the Part C agency and/or LEA?

- provide parents with information and assistance in understanding and advocating for services and support needed to address their child's special needs?

- provide staff with the information, guidance, and resources needed to help children and families meet the individualized goals and objectives in the IFSP/IEP?

- modify activities; remove barriers; and provide support, as needed, for inclusion of children with disabilities in the full range of program activities?

1304.20(c)(4); 1304.20(f);
1304.21(a)(1)(ii); 1304.23(a)(2);
1304.24(a)(3)(iii);
1304.41(a)(4);
1304.53(a)(10)(xvii);
1304.53(b)(1)(iii); 1308;
1310.22(b)

- *REFER TO*—Information on services to children with disabilities gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, and Community Partnerships Interview.

- *OBSERVE*—Centers and/or family child care homes and focus children with disabilities using the Classroom, Family Child Care, or Socialization Experience and/or Home Visit Observation Instruments.

- *INTERVIEW*—As needed, teachers, home visitors, family child care teachers, and disabilities services staff who work with focus children, and community partners serving children with disabilities about the program's policies on and provision of services to children with disabilities.

- *REVIEW*—IFSPs; IEPs; results from developmental screenings and assessments, including records of children's ongoing progress; the program's plan for disabilities services; the Transportation Services Checklist; and the Health and Safety Checklist.

Question 11. **Disabilities Services. How does the grantee ensure that individualized services are effectively provided to children with diagnosed or suspected disabilities?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 12. CURRICULUM AND ASSESSMENT	STANDARDS

How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children's social competence, including school readiness, for each identified program option?

1304.3(a)(5);
1304.21;
1304.23(b)–1304.23(c);
1304.40(e)–1304.40(f);
1306.30(b);
1308.4(c); 1310.21

How does the grantee ensure that:

- the written curriculum includes (a) goals for children's development and learning; (b) the experiences through which children will achieve these goals; (c) what staff and parents can do to help children achieve these goals; (d) the materials needed to support the implementation of the curriculum towards achieving the stated goals; and (e) consistency with the Performance Standards and sound child development principles?

- the curriculum implementation, including assessment, provides appropriate environments and comprehensive programming for children from birth to age five?

- ongoing child assessment (a) is linked to curriculum goals and (b) provides for the collection of information on children's progress?

- the curriculum and assessment process support the inclusion of children with disabilities?

- parents are involved in curriculum implementation and reporting child progress?

- *REFER TO*—Information about curriculum development and implementation, including the linkages with child assessment, gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, and Family Group Interview.

- *OBSERVE*—Focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

- *INTERVIEW*—As needed, teachers and/or home visitors, family child care teachers, family workers, and parents of the focus children about their involvement in curriculum development and their knowledge and involvement of its implementation in the program.

- *REVIEW*—The grantee's plan for child development services, the written curriculum, daily schedules, and the Transportation Services Checklist.

Question 12. **Curriculum and Assessment. How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children's social competence, including school readiness, for each identified program option?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 13. FAMILY PARTNERSHIP BUILDING	STANDARDS
How does the grantee engage in a process of collaborative partnership building with parents? How does the grantee ensure that: • meetings and one-on-one interactions are respectful of each family's diversity and cultural background? • opportunities exist for parents to develop relationships with program staff and to participate in an individualized family partnership agreement process? • staff work with families throughout the year to identify family goals, strengths, and necessary services and supports, and to describe progress in achieving family goals? • staff work with parents to identify and access services and resources responsive to their interests and goals, and follow up with them to ensure that the referrals met their expectations and circumstances? • for programs that enroll pregnant women, infants, and toddlers, assistance is available to mothers in accessing comprehensive prenatal and postpartum care?	1304.20(e); 1304.21(a)(2); 1304.23(b)(4); 1304.40; 1304.50(a)(1); 1306.30(b); 1308.19(j); 1308.21

• *REFER TO*—Information on family partnership building gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, and Family Group Interview.

• *OBSERVE*—Focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

• *INTERVIEW*—Relevant community partners and, as needed, focus families and family services personnel and other staff working with families about how the program partners with parents, how the family partnership agreement process is developed and implemented, how progress is monitored, how families are connected to community resources, and what services are provided to families with pregnant women.

• REVIEW—Conversation or anecdotal notes; any evidence describing family goals and progress in meeting them, such as family portfolios; information on pre-existing plans with other agencies, when applicable; and the program's written plan for family and community partnerships.

Question 13. **Family Partnership Building. How does the grantee engage in a process of collaborative partnership building with parents?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 14. PARENT INVOLVEMENT | STANDARDS

How does the grantee provide parent involvement opportunities?

How does the grantee ensure that:

1304.20(e)(4); 1304.23(d); 1304.24(a)(1); 1304.40(b)–1304.40(h); 1304.50; 1308.19(j); 1308.21

- parents are involved in the development of the program of services for children, including home visits; parent conferences; the delivery of health care services to children; the development of the curriculum; planning, implementing, and evaluating nutrition services; and developing and implementing services for children with disabilities?

- opportunities are responsive to the ongoing and expressed interests and needs of individual parents and groups of parents?

- parents have opportunities to enhance their skills and knowledge in the following areas:

- knowledge of child growth and development, the program's curriculum, the child assessment process, and parenting skills;

- prevention of child abuse and neglect;

- family literacy;

- medical, dental, mental health and nutrition (encouraging parents to become active partners in their child's health care process and learn the principles of preventive health and safety);

- community advocacy (encouraging parents to influence the character and goals of community services);

- transition activities (assisting parents in becoming their child's advocate as the child moves to public school or another child care setting); and

- prenatal education on fetal development, labor and delivery, and postpartum recovery, as appropriate?

- *REFER TO*—Information on parent involvement gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, and Family Group Interview.

- *INTERVIEW*—As needed, focus families, family services and other staff working with families, policy group members, and relevant community partners about how the agency plans for and fosters parent involvement.

- *REVIEW*—Documentation of home visits and parent/teacher conferences, records of parent involvement activities, documentation of parent participation in Parent Committee and policy groups, staff or parent training records, and the program's plan for parent involvement.

Question 14. **Parent Involvement. How does the grantee provide parent involvement opportunities?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 15. COMMUNITY PARTNERSHIPS	STANDARDS

How does the grantee take an active role in community planning and advocacy to improve the delivery of services to children and families?

1304.23(b)(4); 1304.24(a)(3)(iv); 1304.40(e)(4); 1304.41; 1308.4(l); 1310.23

How does the grantee:

• develop community partnerships, supported by interagency agreements, as appropriate (e.g., with the LEA or Part C agency, child protective services, or local transportation system)?

• establish collaboration within the grantee agency and across agencies?

• promote the access of children, families, and pregnant women, as appropriate, to community services that are responsive to their needs, such as child care?

• coordinate services to children with disabilities and their families with community agencies?

• encourage volunteers to participate in Head Start?

• support the transitions of families in, through, and out of Head Start and Early Head Start?

• establish and maintain an effective Health Services Advisory Committee that includes parents, professionals, and other volunteers from the community?

• establish and maintain other service advisory committees as appropriate to address program issues and to help the program respond to expressed family and community needs?

• *REFER TO*—Information on community partnerships gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, Policy Council Interview, Child Care Partnerships Interview, and Community Partnerships Interview.

• *INTERVIEW*—As needed, a small number of community partners; focus families; Health Services Advisory Committee members and other advisory group members, as appropriate; and staff (including disabilities services staff) about the existence and effectiveness of community partnerships and interagency services for children and their families.

• *REVIEW*—Interagency agreements; community resource guide to determine if it addresses families' comprehensive needs; the program's plan for community involvement, planning, assessment, and advocacy for all families; services for children with disabilities; and activities to facilitate transition.

Question 15. **Community Partnerships. How does the grantee take an active role in community planning and advocacy to improve the delivery of services to children and families?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 16. ELIGIBILITY, RECRUITMENT, SELECTION, ENROLLMENT, AND ATTENDANCE	STANDARDS

How does the grantee approach eligibility, recruitment, selection, enrollment, and attendance in an attempt to meet the needs of Head Start-eligible families and in response to the community assessment?

1305.3–1305.8; 1308.5

How does the grantee:

- define the recruitment area?

- determine the eligibility of children, ensuring that no more than 10% come from families that exceed the low-income guidelines?

- ensure that at least 10% of enrollment opportunities are made available to children with disabilities?

- recruit those most in need of Head Start services, including previously underserved populations?

- select children and families based on enrollment criteria, and maintain a waiting list?

- assign children to program options that meet the needs of their families?

- meet the service requirements for each option?

- maintain the funded enrollment level, fill vacancies as they occur, and analyze enrollment data to inform the planning process?

- analyze the causes of absenteeism, when average daily attendance falls below 85%?

- *REFER TO*—Information on eligibility, recruitment, selection, enrollment, and attendance gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, family services personnel, focus families, and policy group members.

- *REVIEW*—The current community assessment; eligibility, selection, and enrollment criteria; written information on the recruitment process and the recruitment area; the current waiting list of eligible children; income verification forms from focus children's records; class rosters and home visitor assignments; the set of attendance records; written enrollment procedures; evidence of recruitment and enrollment of children with disabilities; and the Policy Council meeting minutes concerned with eligibility, selection, and enrollment issues.

Question 16.   **Eligibility, Recruitment, Selection, Enrollment, and Attendance. How does the grantee approach eligibility, recruitment, selection, enrollment, and attendance in an attempt to meet the needs of Head Start-eligible families and in response to the community assessment?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 17. FACILITIES, MATERIALS, EQUIPMENT, AND TRANSPORTATION	STANDARDS

How does the grantee ensure that facilities, materials, equipment, and transportation services, when they are provided, are safe, appropriate, and conducive to learning and reflective of the different ages and stages of development of each child, including children with disabilities, for the conduct of all program activities?

How does the grantee ensure that:

- construction of facilities and purchase of vehicles meet all requirements?

- required inspections, maintenance, and repairs are taking place, and facilities and transportation vehicles are in compliance with all relevant Federal, State, tribal, and local requirements?

- center-based environments are free of toxins, such as smoke, lead, pesticides, and herbicides?

- arrangements and space, as well as types and uses of materials and equipment, match the grantee's identified curriculum?

- the facilities, materials, equipment, and vehicles are accessible to persons with disabilities as required by Section 504 of the Rehabilitation Act?

STANDARDS

1304.21(a)(4)(iv);
1304.21(a)(5)–1304.21(a)(6);
1304.22(e)(7); 1304.23(e);
1304.53(a)(1)–1304.53(a)(5);
1304.53(a)(6)
1304.53(a)(7)–(9);
1304.53(a)(10)(iv);
1304.53(a)(10)(xiv)–
1304.53(a)(10)(xv);
1304.53(a)(10)(xvii);
1304.53(b); 1306.30(c);
1308.4(o)(4)–1308.4(o)(6);
1310.10; 1310.12(b);
1310.13–1310.15(b); 1310.15(d);
1310.20; 1310.22(b); 1310.23;
45 CFR 84.5

- *REFER TO*—Information on facilities, materials, equipment, and transportation gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, and Family Group Interview.

- *INTERVIEW*—As needed, a small number of staff to determine accommodations for children with disabilities or special needs and adequacy and maintenance of facilities, equipment, and transportation vehicles.

- *REVIEW*—The results from ongoing monitoring of health and safety, the annual safety inspection, licenses, maintenance logs, procurement requests and/or purchasing records (if needed), the Health and Safety Checklist, and the Transportation Services Checklist.

Question 17. **Facilities, Materials, Equipment, and Transportation. How does the grantee ensure that facilities, materials, equipment, and transportation services, when they are provided, are safe, appropriate, and conducive to learning and reflective of the different ages and stages of development of each child, including children with disabilities, for the conduct of all program activities?**

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 18. CHILD OUTCOMES	STANDARDS

How has the grantee implemented requirements related to child outcomes?

How does the grantee ensure that:

- long-range goals and short-term program objectives reflect the findings of ongoing monitoring and the self-assessment, including analysis and use of child outcomes data?

- the record-keeping and reporting systems used to manage data and generate status reports provide information on preschool children's progress on the required domains, elements, and indicators when they enter the program, at a midpoint in the year, and at the end of the year?

- ongoing monitoring ensures tracking of patterns of progress and accomplishments for groups of children in the 8 domains of learning and development?

- the results of the self-assessment, including child outcomes data on patterns of learning and development for groups of children in the 8 domains and the 13 mandatory elements and indicators of literacy, numeracy, and language are analyzed; and that the information is used to address continuous improvement and to inform the grantee's planning process?

- individualization addresses the 8 domains of learning and development?

- for preschool children, the curriculum includes experiences in the 8 domains of language, literacy, mathematics, science, creative arts, social and emotional development, approaches to learning, and physical development and health?

- ongoing child assessment includes, in the case of preschool children, accomplishments in the 8 domains and 13 required elements/indicators?

STANDARDS column:
1304.21(a)(1)(i); 1304.40(e)(5); 1304.51(a)(1)(ii); 1304.51(a)(1)(iii); 1304.51(g); 1304.51(i)(1); 1304.51(i)(2); Head Start Act, Sections: 641A(a)(1)(B); 641A(b)(4); 642(e); 648A(a)(1)(A)

- *REFER TO*—Information on planning, ongoing monitoring, record-keeping and reporting, self-assessment, individualization, curriculum development and implementation, and child assessment, including linkages to child outcomes gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview.

- *INTERVIEW*—As needed, program management personnel, policy group members, and staff or governing body members regarding data collection and reporting, the monitoring process, their involvement in the self-assessment and planning processes; teachers and/or home visitors, family child care teachers, and parents of the focus children about how the program individualizes services, and their involvement in curriculum development and its implementation.

- *REVIEW*—Statement of long-range and short-term objectives, decision-making about program options, and written plan(s); files of focus children and families (including assessment data) and a selection of status reports; program policies, procedures, and written documents pertaining to ongoing monitoring; the annual self-assessment data and analysis; periodic recordings of each child's developmental progress in each of the 8 domains of learning and development; and the written curriculum reflecting the inclusion of the 8 domains, and daily schedules.

Question 18.   Child Outcomes. How has the grantee implemented requirements related to child outcomes?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

What's New for FY 2005 Interview Protocols

For FY 2005, many of the interview protocols have been revised and new forms aimed at improving the interviewing process have been added to this section of the PRISM Instrument. The following is a detailed list of these changes.

Sign-In Sheets

Two sign-in sheets were added to help reviewers track interview attendees. The sign-in sheets include: (1) a **General Sign-In Sheet** for all interviews (with the exception of the Policy Council and Family Group Interviews), the **Summary Meeting**, and other meetings or interviews, as applicable; and (2) a **Policy Council and Family Group Interview Sign-In Sheet**, which contains space for participants to include more detailed information about themselves and their enrolled child(ren).

More detailed guidelines on functionality and process for the sign-in sheets appears in the "Sign-In Sheet Instructions" located immediately after this section.

Revised Interview Protocols

Interview protocols, including the **Content Area Experts Interview Protocol** and the **Governing Body Interview Protocol**, were updated to reflect the requirement for full implementation of child outcomes (i.e., Core Question 18 and its corresponding program requirements) in the following questions:

- Question #8 in the Content Area Experts Interview Protocol

- Question #10 in the Governing Body Interview Protocol

Additionally, other minor edits were made to Question #4 of the Content Area Experts Interview Protocol.

The **Staff Group Interview Protocol** has been revised to include questions for additional staff members, such as teacher's aides, cooks, custodians, and bus drivers. The inclusion of these questions will provide reviewers with an added opportunity to facilitate and encourage greater participation from the staff members mentioned above. Therefore, the following changes were made to the Staff Group Interview Protocol:

- Added a bullet point under Question #2 about assessing transportation needs of families;

- Added Question #5 about communicating children's special needs to the cook and bus driver;

- Added language to Question #7 about individualization practices for the aforementioned staff members;

- Question #8 was revised to include all staff members in the discussion of ongoing communication; and

- Added bullet points to Question #10 about parent participation in planning and evaluation of nutritional and transportation services.

The **Community Partnerships Interview Protocol** was revised to focus more on the outcomes of the partnerships among the Head Start/Early Head Start programs and community partners. The first four questions from the FY 2004 version of the protocol that served as background information were deleted for FY 2005. However, in order for this information to be retained, similar questions were added to the Community Partnerships Information Form. Since the Community Partnerships Information Form should be filled out prior to the review, the reviewers will already be familiar with such background information. The remaining four questions that appear in the protocol focus on the effects and future activities of the partnerships (see "Introduction" in the Community Partnerships Interview Protocol).

SIGN-IN SHEET INSTRUCTIONS

General Sign-In Sheet

A blank General Sign-In Sheet, for use in documenting interview and meeting participants, appears immediately following this instructions page. This sign-in sheet should be used for any of the formal interviews (excluding the Policy Council and Family Group Interviews, which have their own sign-in sheets), the Entrance and Summary Meetings, and any other meeting or interview, as applicable. There are areas on the sheet to write in the program name, date, time, name of notetaker, and name of facilitator, and to identify the interview or meeting being conducted. The second half of the sheet allows space for each participant to include his or her name, title, and agency. Please note that this sign-in sheet contains lines for ten participants to sign-in. However, if there are more than ten participants, you may copy the blank form and use those copies for any additional participants.

Policy Council and Family Group Interview Sign-In Sheet

A blank Policy Council and Family Group Interview Sign-In Sheet, for use in documenting interview participants, appears in this section following the General Sign-In Sheet. This sign-in sheet should be used for the Policy Council Interview, Family Group Interview, and any other meeting or interview, as applicable. There are areas on the sheet to write in the program name, date, time, name of note taker, and name of facilitator, as well as indicate the interview or meeting being conducted. The second half of the sheet allows space for participants to sign-in and note important information that will be valuable for the review team during and after the interview. Each participant should include his or her name, the children's names enrolled in Head Start/Early Head Start, the name of the center and classroom (if applicable) for each enrolled child, the type of program option (e.g., Head Start or Early Head Start; center or home-based; full or part day) in which each child is participating, and the participant's position on Policy Council, if applicable. Please note that this sign-in sheet contains lines for ten participants to sign-in. However, if there are more than ten participants, you may copy the blank form and use those copies for any additional participants.

General Sign-In Sheet

Program _____

Notetaker _____

Date _____ *Time* _____

Facilitator _____

Indicate Interview by [X]:

[ ] Entrance Meeting/Grantee Presentation
[ ] Management Team (Optional)
[ ] Delegate Directors (Optional)
[ ] Content Area Experts (Optional)
[ ] Staff Group (Optional)

[ ] Child Care Partnerships
[ ] Community Partnerships
[ ] Governing Body
[ ] Summary Meeting
[ ] Other (Specify)

	Name	Title	Agency
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

Policy Council and Family Group Interview Sign-In Sheet

Program _____ Date _____ Time _____

Notetaker _____ Facilitator _____

Indicate Interview by [X]:

[ ] Family Group Interview
[ ] Policy Council Interview

	Your Name	Name(s) of Your Child/Children in Head Start	Center	Classroom (if Applicable)	Program Option (e.g., HS or EHS, Center or Home-Based, Full or Part Day)	Your Position on Policy Council (if applicable)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

Entrance Meeting and Grantee Presentation

PURPOSE

- To provide an opportunity for the team leader to make some general comments about the course of the review;

- To provide an opportunity for team members and Head Start staff to meet one another; and

- To provide grantee staff with the opportunity to make a presentation about their program to the review team.

LOGISTICS

- **Content:** The entrance meeting includes two activities: (a) an entrance session for general comments and introductions, and (b) an optional grantee presentation. The grantee presentation does not have to follow a specific style or manner. In preparing its presentation, the grantee should consider the following topics:

  - the agency's history and the grantee's organizational structure and program design, including program options and child care partnerships;

  - the context in which the program operates, including available resources and community demographics; and

  - the strengths and challenges of Head Start families, and how the program is designed to build on strengths and deal with challenges.

- **Duration:** The entrance meeting lasts no more than an hour. The grantee presentation is voluntary.

- **Review team participants:** All review team members must attend. If the grantee does not make a presentation, the team leader covers the topics of grantee organization and community context during the Management Team Interview.

- **Grantee participants:** Any grantee staff may attend.

Management Team
Interview Protocol

PURPOSE

- To foster the partnership approach during the monitoring process through open discussion;

- To continue to provide a general overview, or "big picture," of the program from the grantee's point of view; and

- To provide an initial understanding of how the grantee describes its systems.

LOGISTICS

- **Duration:** This optional interview lasts 2 hours and is held on the first day of the monitoring review, following the entrance meeting.

- **Review team participants:** The team leader leads the interview. Any review team members assigned by the team leader may attend. One review team member takes notes.

- **Grantee participants:** The grantee's entire management team participates in this interview. The group includes the agency director, the grantee's Head Start/Early Head Start director, the fiscal officer, program managers (individual(s) assigned the management of child development and health services and family and community partnerships), a representative from the governing body, and the Policy Council chair.

- **Group size:** Attendance depends upon the grantee's organizational structure; however, a group size of 10–12 is recommended.

INTRODUCTION

The purpose of this meeting is to provide a general overview, or "big picture," of your program. To do so, we will talk with you about the systems that are in place in the program to support the delivery of services to children and families. Let's start with introductions. Please tell us your name and role in Head Start/Early Head Start.

Grantee and Community Background

(Ask the following question if grantee staff did not make the optional presentation at the entrance meeting, or if they did not provide adequate information during the presentation.)

1. Before beginning an in-depth discussion about the grantee's systems, we want to be sure that we understand the organizational structure of your program and the context in which it operates. Briefly describe your community, the agency's history, and the program's organizational structure and program design, including program options and child care partnerships.

   Listen for:

   • the community in which the grantee operates, including available resources and community demographics;

   • community strengths and the major difficulties faced by the community;

   • how the Head Start program takes these factors into account when planning and implementing program services;

   • the strengths and primary challenges of Head Start families;

   • key community issues facing families, such as welfare reform, child care, literacy, substance abuse, and employment issues; and

   • how the program is designed to deal with these challenges.

Planning

2. Let's talk about your grantee's planning process. How do you arrive at your goals and objectives? Do you have a long-term or "strategic" plan? What does it involve? How did you decide on this plan? Describe your plan for **collecting**, **analyzing**, and **using** information on child outcomes.

   Listen for:

   • how the program has moved towards reaching these goals and objectives; and

   • how progress towards reaching outcomes, including child outcomes, is measured.

Communication

3. In general, how would you describe your communication system?

    Listen for:

    -   regular communication between staff and parents (carried out in parents' preferred language);

    -   information sharing among staff, governing bodies, and policy groups;

    -   if grantee has delegate agencies, information sharing with delegate agency governing bodies, Policy Committees, and staff;

    -   communication, cooperation, and information sharing with community partners; and

    -   regular communication among staff.

Program Governance

4. How does the program's governance fit into all of the other systems we have been talking about today?

    Listen for:

    -   governing body participation in key decision-making, including program oversight;

    -   the governance structure, including the governing body, policy groups, and Parent Committees;

    -   roles and responsibilities of each of these groups; and

    -   internal dispute resolution procedures.

Record-Keeping & Reporting

5. In general, how does the program organize its system of record-keeping and reporting?

    Listen for:

    -   records maintained for children and families;

    -   procedures for producing and disseminating status reports, including those related to child outcomes; and

    -   how staff in management positions use records to revise program plans, manage program quality, and maintain program accountability.

Ongoing Monitoring

6. How does the grantee monitor the quality of program services on a regular basis?

    Listen for:

    •   checking progress towards meeting goals and objectives;

    •   analysis of information contained in tracking systems and written reports, including information on child outcomes;

    •   on-site observation and supervision of staff;

    •   how information from ongoing monitoring is used to make program changes; and

    •   oversight of delegate agencies and child care partnerships, when applicable.

Self-Assessment

7. Describe the process for your agency's annual self-assessment. How is information that is gathered used for program improvements? How is information about child outcomes included in the annual self-assessment?

    Listen for:

    •   who is involved in the process;

    •   description of where the grantee is in the process of implementing the child outcomes initiative; and

    •   changes made as a result of self-assessment.

Human Resources

8. Please describe the overall organization of your staff.

    Listen for:

    •   how staff are organized to support the program;

    •   how staff are supervised;

    •   planning for and status of plans to meet staff qualifications, including teacher requirements for CDAs, and 2-year and 4-year degrees;

    •   how staff are trained to measure, track, analyze, and use information about children's progress; and

- the program's system for staff training and development, including orientation and performance reviews.

Fiscal Management

9. Describe the fiscal system, and how the management team and the fiscal officers work together to support the delivery of Head Start services.

    Listen for:

    - how Federal regulations regarding fiscal management are met;

    - how the budget is developed and approved;

    - how expenditures are monitored;

    - what reports are produced and how they are used; and

    - how the grantee maintains accountability.

SUMMARY

Is there anything else you would like to tell us that will help us understand the context in which your agency operates, your organizational structure, or your systems, or that will help set the stage for us as we continue this review?

Delegate Directors Interview Protocol

PURPOSE

- To be used with a grantee that has many delegate agencies, at the discretion of the team leader. If the grantee has one or two delegate agencies, the directors of these agencies may be invited to the Grantee Management Team Interview in lieu of completing this protocol.

- To provide the review team with necessary information on the relationship of the grantee to its delegate agencies. Eight systems connect the two entities—planning, governance, communications, ongoing monitoring, record-keeping/reporting, self-assessment, human resources, and fiscal management.

- To provide an opportunity for directors of delegate agencies not included in the full review to talk with the review team about grantee management system involved in the oversight of delegate agency programs.

LOGISTICS

- **Duration:** This optional interview lasts about 2 hours and should follow the Management Team Interview. Since the Delegate Directors Interview only occurs in grantees with many delegate agencies, it generally is held prior to the start of the full review, not more than 1 month before the review. It can also be scheduled on the first full day of the review.

- **Review team participants:** The team leader generally leads this interview. If this interview is held prior to the full review, other Federal staff who will serve as subteam leaders also attend. In cases where it is held on the first day of the full review, the team leader may choose which review team members should attend. If possible, a representative of the review team looking at grantee oversight attends.

- **Grantee participants:** In consultation with the team leader, the grantee selects delegate agency directors to attend this interview. Delegate agency directors who have not been selected to be part of the rest of the review should be included.

- **Group size:** A group size of 8 to 12 delegate directors is recommended.

INTRODUCTION

The purpose of this meeting is to bring together a group of delegate agency directors to discuss the grantee's oversight and monitoring of delegate operations. Most of your agencies will not be a part of the full review, and this meeting provides you an opportunity to contribute your perspectives about grantee operations and how they affect you. To begin, please tell us your name, the agency you direct, and a little about the agency.

Planning

1. Let's talk about how the grantee and delegate planning systems fit together. How would you describe your planning system and that of the grantee? How do these systems connect? How do grantee staff support your agency in planning?

    Listen for:

    *   the instructions (e.g., funding guidance) the grantee provided to describe the grantee's versus the delegate's role in planning;

    *   a description of the grantee's community assessment, the role the delegates play in this process, and the information it provides to the delegate OR the delegate's own community assessment and the role the grantee plays in that;

    *   how the grantee connects the results of the community assessment with its funded enrollment decisions and how these decisions are related to other elements of the planning process; and

    *   how the grantee is involved in other planning activities within the delegate agency (e.g., the development of program plans or decisions about program options).

Self-Assessment

2. What is involved in the grantee's process of self-assessment? How do your procedures interface with those of the grantee?

    Listen for:

    *   whether delegates conduct a separate self-assessment;

    *   if the self-assessments are separate, the role the grantee plays in the delegate's self-assessment and the way the grantee uses the information collected by the delegate; and

    *   inclusion of a review of child outcomes and the use of this information in program planning.

Communication

3. How does your communication system connect with that of the grantee? What kinds of things does the grantee communicate to you and ask from you? What evidence do you have that your communication system supports quality services for children and families?

    Listen for:

    *   procedures and timetables the grantee has communicated to the delegate;

    *   how the grantee assures that its delegates receive all HHS regulations, policies, guidelines, and other communications;

    *   a description of the grantee's funding guidance to the delegate to ensure that it describes the grantee's expectations for the application/refunding process and how the grantee will communicate with the delegate about reports, provision of training and technical assistance, etc.;

    *   schedule and substance of meetings of the grantee and delegates, and a description of how information from such discussions is used; and

    *   opportunities and methods for delegates to communicate issues of concern, recommendations, or useful information to the grantee.

Governance

4. How does the grantee's governance system interface with that of the delegate agencies?

    Listen for:

    *   opportunities for information exchange and decision-making between the grantee and each delegate agency's governing body, with explanations of the processes, who is involved, and who initiates communication;

    *   grantee procedures for assuring that the governing body of each delegate carries out its oversight and fiduciary functions and shares decision-making with the delegate's Policy Committee;

    *   specific stipulations in the delegate agency contract about the relationship between the grantee and the delegate's governing body (meetings, training, etc.);

    *   communication between the Policy Council and Policy Committees; and

    *   how the grantee ensures that parents at the delegate agency are appropriately involved in governance functions.

Record-Keeping and Reporting

5. Please describe the record-keeping and reporting systems that connect you and the grantee. How do they support each other?

    Listen for:

    - the types of program and fiscal reports the grantee provides the delegates and how this information is used by the delegate;

    - the types of reports the delegate provides to the grantee and how this information is analyzed and used by the grantee;

    - the kinds of trends and patterns you identify in your reports to the grantee and the actions that are taken by the grantee in response to these;

    - how the grantee monitors to ensure that your records provide sufficient detail to assure quality services to children and families; and

    - what delegate agencies do with the feedback received from the grantee.

Ongoing Monitoring

6. What is the grantee's process for the ongoing monitoring of delegates? How do you share information with the grantee about your ongoing monitoring of your own systems and services?

    Listen for:

    - how the grantee uses delegate reports of program and fiscal operations in its monitoring processes;

    - how the grantee provides assistance to delegates if problems are identified during the delegate's own monitoring;

    - how the grantee communicates to the delegate about (a) serious issues (e.g., items constituting noncompliance or a deficiency) detected during the grantee's monitoring and (b) its expectations concerning the resolution of these issues; and

    - how the grantee follows up to ensure that its concerns are appropriately and adequately addressed.

Human Resources

7. How do the grantee and delegate agency human resources systems interface?

Listen for:

- how the grantee's organizational structure supports the accomplishment of delegate program objectives;

- the role the grantee plays in the hiring of delegate agency staff;

- how the grantee ensures that adequate and qualified staff are employed at the delegate agency to provide quality services;

- how the grantee assesses that training and technical assistance (T/TA) needs of the delegate are met; and

- how the grantee supports the ongoing professional development of delegate staff.

Fiscal Management

8. Describe the interface between the grantee and delegate fiscal systems.

    Listen for:

- the grantee's system for advances to delegates and reimbursements of delegate expenses;

- the way the grantee monitors the delegate's fiscal procedures to ensure operating efficiency and the delivery of effective services;

- how the grantee oversees and monitors each delegate's expenditure of funds so that re-budgeting can occur when necessary; and

- the grantee's process for assuring that the delegate audit findings are corrected.

9. Is there anything else you would like to tell us that will help us understand the interaction of the grantee with its delegate agencies?

CONCLUSION

Thank you for taking the time to talk about these issues. We've been able to get a much clearer picture of grantee and delegate interactions from the things you've shared with us during this interview. As we close, we'd like to ask each of you to share with us one example of how you participate in ongoing monitoring to ensure quality services to children and families.

Content Area Experts Interview Protocol

PURPOSE

- To foster the partnership approach during the monitoring process through open discussion;

- To help reviewers obtain the "big picture" of the grantee's services and understand how services are integrated and carried out; and

- To provide the framework for the focus child and family process.

LOGISTICS

- **Duration:** This optional interview lasts 1½ to 2 hours. It is conducted as soon as possible after the Management Team Interview. It may take place at the same time as a Staff Group Interview.

- **Review team participants:** Unless a Staff Group Interview occurs simultaneously, all review team members, as assigned by the team leader, participate in the Content Area Experts Interview. The team leader may assign reviewers representing Child Development and Health Services, Family and Community Partnerships, and Management Systems to attend. One reviewer facilitates the interview, while another takes notes.

- **Grantee participants:** All of the content areas as specified in the standards should be represented in the group interview (e.g., child development and health services [including disabilities], family and community partnerships, etc.). The group also includes mental health and nutrition consultants, when used by the grantee.

- **Group size:** A group size of 10–12 is recommended. With some grantees, the content area experts may also have attended the Management Team Interview.

INTRODUCTION

The purpose of this group interview is to get a "behind-the-scenes" look at how your grantee operates. We've already had a meeting with your management staff to help us get a feel for the "big picture" of how systems operate in the program. Now we would like to hear how your team designs, implements, integrates, and oversees delivery of services for children and families. To help us get an integrated perspective, we'd like to hear how all content area experts contribute to child development, health services, and family and community partnerships.

We'd like to keep this informal, so feel free to jump in with answers to any question. Please don't feel pressured to answer any question you don't feel comfortable answering. We're looking forward to getting to know you and to learning more about your Head Start/Early Head Start program. Let's start by introducing ourselves. As you introduce yourself, please tell us how you got involved with Head Start/Early Head Start, and share one positive thing about the program that has directly affected you.

Family Partnership Building

1. Let's talk about how your team of content area experts works to build partnerships with the families in this program.

    Listen for:

    • partnerships that include family-identified goals;

    • follow-up with parents to ensure that appropriate referrals are made;

    • tracking of family goals and accomplishments;

    • interactions with families that acknowledge and respect their diversity and cultural background; and

    • assistance to pregnant women in Early Head Start in accessing comprehensive prenatal and postpartum care.

Parent Involvement

2. How does the team develop parent and family involvement opportunities and make sure they are implemented?

    Listen for:

    • involvement in a variety of program activities, including those related to program governance;

- efforts to conduct these activities in ways respectful of the various languages spoken by families;

- participation in experiences related to children's learning, developmental progress, and assessment; and

- encouragement to become active partners in their children's health care process.

Community Partnerships

3. How does this team get involved in community planning and advocacy with and for parents to improve the quality of services for children and families?

   Listen for:

   - information regarding community partnerships, supported by interagency agreements;

   - collaboration within the grantee agency and across agencies;

   - partnerships with child care agencies and agencies providing special services to pregnant women, infants, toddlers, and children with disabilities;

   - participation of volunteers to enhance program services;

   - support for the transitions of families in, through, and out of Head Start/Early Head Start; and

   - evidence of a Health Services Advisory Committee, including parents, professionals, and other volunteers from the community.

Eligibility, Recruitment, Selection, Enrollment, and Attendance

4. How does the team use the information from the community assessment to develop a plan for eligibility, recruitment, selection, enrollment, and attendance that meets the needs of Head Start/Early Head Start-eligible children and families?

   Listen for:

   - efforts to meet and maintain funded enrollment;

   - eligibility and enrollment criteria;

   - efforts to ensure that no more than 10% are over income;

   - efforts to ensure that at least 10% of enrollment opportunities are made available to children with disabilities;

- maintenance and use of the waiting list; and

- ongoing monitoring of attendance.

Prevention and Early Intervention

5. How does this team make sure that there is a comprehensive system for preventing health problems and for intervening when problems exist?

    Listen for:

    - parents as full partners in prevention and early intervention;

    - evidence of an ongoing source of continuous and accessible health care;

    - appropriate preventive health practices;

    - nutritional services that reflect the diversity of families;

    - services for pregnant women, infants, and toddlers in Early Head Start; and

    - provision of mental health services.

Health Care Tracking and Follow-Up

6. How does the team track the provision of child health and developmental services?

    Listen for:

    - procedures to ensure that follow-up treatments are provided in a timely manner; and

    - evidence that confidentiality requirements are met and those who need information can access it.

Curriculum and Assessment

7. Please describe your curriculum. How do you ensure that the assessment process is aligned with the program's curriculum and includes experiences that support school readiness, the eight domains of learning and development, and required domain elements and indicators?

    Listen for:

    - description of a written curriculum;

    - explanations of how child assessment occurs in each program setting or option;

    - alignment of the curriculum with results of children's ongoing assessment;

- parent involvement in the selection, development, implementation, and evaluation of the curriculum for each option;

- staff training and development related to curriculum and child assessment;

- staff supervision; and

- ongoing monitoring of curriculum implementation.

8. How are you involved in the child outcomes process?

   Listen for:

   - assisting or training teaching staff;

   - ongoing monitoring of this assessment process;

   - involvement in the analysis and use of child outcomes data;

   - review of child outcomes data at least three times during the year; and

   - the inclusion of requirements related to child outcomes in the agency self-assessment.

Individualization

9. How does the team make sure that information gathered through the child assessment process is individualized for each child in consultation with the family?

   Listen for:

   - individualization that is reflected in the program's curriculum, planning, record-keeping, and family partnership process; and

   - evidence of how individualization addresses children's strengths and needs, temperament, language, cultural background, and learning style.

Disabilities Services

10. How does the team make sure that individualized services are effectively provided to children with diagnosed or suspected disabilities?

    Listen for:

    - necessary accommodations that are made to the assessment process for children with disabilities;

- coordination with the Part C agency and/or LEA for timely assessment;

- encouragement of parent advocacy for services and support;

- education of staff on the information, guidance, and resources needed to help children and families meet the individualized goals and objectives in the IFSP/IEP; and

- efforts to modify activities, remove barriers, and provide support for children with disabilities.

Facilities, Materials, Equipment, and Transportation

11. How do you, as a team, make sure that the facilities, materials, equipment, and transportation, including buses, are appropriate for children of different ages and stages of development, including children with disabilities? How do you make sure that appropriate space is provided to conduct all program activities?

    Listen for:

    - required safety checks, inspections, maintenance, and repairs;

    - when applicable, details about the transportation system;

    - compliance with relevant Federal, State, tribal, and local health, safety, or licensing requirements;

    - toxin-free, center-based environments and materials;

    - arrangements, space, and types and uses of materials and equipment that support curriculum; and

    - adherence to requirements in Section 504 of the Rehabilitation Act.

CONCLUSION

Thank you for taking the time to talk about your program with us today. We've been able to get a much fuller view of your program because of the things that you shared with us during this interview. As we close, we'd like to ask each of you to share with us one example of how you conduct or participate in ongoing monitoring to assure quality services in the areas we have just discussed.

Staff Group Interview Protocol

PURPOSE

- To foster the partnership approach during the monitoring process through open discussion;

- To help reviewers understand how services are delivered to children and families from the perspective of the direct services staff;

- To continue to give reviewers a picture of how systems support services; and

- To provide information to be used in the focus child and family process.

LOGISTICS

- **Duration:** This optional interview lasts no more than 2 hours and takes place on the first day of the review, after the Management Team Interview. Depending upon grantee size, complexity, and the geographic distance between sites, it may be necessary to hold multiple Staff Group Interviews.

- **Review team participants:** The team leader may assign reviewers to participate in either a Staff Group Interview or the Content Area Experts Interview. If these meetings do occur, it is helpful if two reviewers attend each interview—one to facilitate, one to take notes.

- **Grantee participants:** This interview involves direct services staff, representing a variety of roles (e.g., teachers, family service workers, teaching assistants, cooks, bus drivers, and other support staff).

- **Group size:** A group size of 10–12 is recommended.

INTRODUCTION

The purpose of this interview is to help us get a sense of how families move through your Head Start/Early Head Start program, from initial contact to present involvement, so we can get a feel for the services provided for the family and how these services are documented. We are going to ask questions about how a typical child and family experience Head Start/Early Head Start. You might find it helpful to think of a specific family as you answer the questions, although if you talk about real families during the discussion, please don't use their names, so we can ensure their confidentiality.

We'd like to keep this informal, so feel free to jump in with answers to any question. Please don't feel pressured to answer any question you don't feel comfortable answering. We're looking forward to getting to know you and to learning more about your Head Start/Early Head Start program. Let's start by introducing ourselves. As you introduce yourself, please tell us your name, what role you have in the program, and share one thing that you've learned since you've been working with Head Start/Early Head Start.

From Recruitment to Enrollment

1. How do your families find out about Head Start/Early Head Start? What is your first contact with a family like?

   Listen for:

   • use of a variety of recruitment methods;

   • communication with families about the Head Start/Early Head Start philosophy; and

   • assistance to parents as they gather paperwork and complete the application.

2. Tell me how the decision is made to accept a particular child into the program.

   Listen for:

   • criteria and system used to make decisions;

   • procedures for handling families unable to document eligibility;

   • an assessment of the transportation needs of families; and

   • communications with and support for families on the waiting list.

Learning About Children

3. Describe the process you follow to screen children for developmental, sensory, and behavioral concerns.

Listen for:

- procedures for securing parent permission;

- what occurs if a parent refuses to give permission for screenings;

- procedures that staff follow to ensure screenings are completed on time; and

- use of a systematic and effective approach to screenings that relies on multiple sources and looks at all areas of development.

4. When the results of a screening indicate that a child may have a suspected delay, what do you do?

    Listen for:

    - staff communication with families;

    - family involvement in the process; and

    - strategies for when a parent disagrees with the outcome of a screening.

5. How do children's special needs get communicated internally between staff members (e.g., how does the cook find out about a child's allergies or special dietary requirements, how does the bus driver learn about a child's medical diagnosis)?

    Listen for:

    - ways staff share information about children with special needs;

    - communication with families about children's special needs; and

    - strategies for accommodating a child's special needs in all the child's environments (e.g., classroom, bus, cafeteria, playground).

6. What would happen if a multidisciplinary team recommended a placement for a child that the parents did not agree with?

    Listen for:

    - assistance to parents to help them communicate concerns and preferences to the multi-disciplinary team;

    - staff advocating for the least restrictive environment; and

- coordination with other agencies to maintain children in the environment preferred by parents.

In the Program

7. For classroom/teaching staff - What is your process for ongoing assessment and individualizing the curriculum for children? For cooks - What kind of process do you go through in planning menus? For bus drivers/bus aides - How do you individualize services for specific children?

   Listen for:

   - a systematic ongoing assessment process, linked with the curriculum, that gathers information on children's progress in each of the eight domains of learning and development, and required domain elements and indicators;

   - families participating in setting individual goals for their children based on what is learned through the assessment;

   - the teaching staff's ability to tie individual children's goals into the overall curriculum;

   - the cook's ability to provide a menu with varied foods that consider cultural and ethnic preferences; and

   - the ability of transportation personnel to articulate individualization for specific children.

8. Tell me about the ways staff communicate with parents. Give me some examples of how this happens and the kinds of things you talk about.

   Listen for:

   - frequency of home visits and conferences;

   - range of topics, including child progress, discussed during home visits and conferences;

   - other formal and informal communication strategies (e.g., newsletters, phone calls, conversation with staff at drop-off and pickup); and

   - ongoing communication among cooks, transportation personnel and families.

Family Partnerships

9. Tell us about how you build partnerships with families. What are the first things you do?

Listen for:

- assistance to families in the identification of their family strengths and needs;

- development of family partnership agreements;

- assistance to families in accessing community resources and supports; and

- use of a procedure that ensures follow-up across the year to determine if the services and supports accessed are meeting the families' needs and expectations.

10. Tell me about opportunities families have to be involved in the program and how they hear about those opportunities.

    Listen for:

    - use of a variety of strategies that enable parents to be involved in their child's setting (e.g., classroom volunteer, parent training opportunities);

    - assistance to parents in accessing programs for developing literacy skills, vocational skills, parenting skills, and advocacy and communication skills;

    - participation in Parent Committees (e.g., education, health, nutrition, community advocacy);

    - participation in the policy group or governing body;

    - participation in planning, implementing, and evaluating the program's nutritional services; and

    - participation in planning, implementing and evaluating the program's transportation services.

11. How do you help families prepare for their child's transition from Early Head Start to Head Start or from Head Start to public school?

    Listen for:

    - assistance to parents in the identification of transition issues for their child and in learning advocacy skills;

    - development of parents' awareness of their rights and responsibilities; and

- staff encouragement of parents to maintain a high level of involvement with their child's program following transitions.

12. Give an example of a parent calling or coming to speak with you about an issue or concern. How do you handle it?

    Listen for:

    - staff knowledge about where to direct parents' issues and concerns; and

    - support for staff in their responses to parents' issues and concerns.

Human Resources and Program Management

13. Tell me about how you find out what's going on in the program and how you let managers know about issues you have.

    Listen for:

    - formal and informal communication strategies; and

    - communication between managers and classroom staff.

14. Tell me about how you learn what is expected of you in your position and the kinds of support you get to help you do a better job.

    Listen for:

    - staff knowledge and implementation of Head Start/Early Head Start philosophy and Performance Standards;

    - staff receiving ongoing supervision and training from program managers, including training and supervision related to child assessment;

    - managers encouraging staff to participate in professional development opportunities; and

    - frequency and usefulness of performance appraisals.

CONCLUSION

Thank you for your time and input today. As we close, would you each describe something you see as a strength of the program and something about the program you feel we must see or experience while we're here.

Family Group Interview Protocol

PURPOSE

- To continue to clarify reviewers' understanding of the grantee's systems and services as seen through focus families' experiences in Head Start/Early Head Start.

LOGISTICS

- **Duration:** The interview lasts no more than 2 hours. It is scheduled after reviewers have had an opportunity to observe children and talk with staff, and when it is convenient for most focus parents to attend.

- **Review team participants:** At least two reviewers, preferably a child development and health services reviewer and a family and community partnerships reviewer, are present for the Family Group Interview—one to facilitate the discussion, the other to serve as notetaker. All service reviewers attend when possible.

- **Grantee participants:** All parents from focus families are invited to attend. Reviewers should make every effort to use alternative means to talk with focus parents who are unable to attend.

- **Group size:** If there are more than 20 focus families, consider dividing them into smaller groups. A group size of 10–12 is recommended.

INTRODUCTION

Today I would like to talk with you about your experiences with Head Start/Early Head Start. My goal is to learn how Head Start/Early Head Start has worked with families and children, including things that have worked well and those areas in which you would like to see some improvement. We are here to work in partnership with the grantee to help make the program the best it can be.

We know that everyone's experience with Head Start/Early Head Start is different, and we appreciate the opportunity to talk with you about your experiences. We would just like to get a good picture of what the program has been like for you and your children. Let's start with introductions. Tell us your name, your child's name and age, what center or program option your child is enrolled in, how long you've been involved in the program, and one thing that your child has learned in Head Start/Early Head Start.

Recruitment and Enrollment

1. Tell me how you found out about Head Start/Early Head Start and what it was like for you to get into Head Start/Early Head Start.

   Listen for:

   • communication with families about Head Start/Early Head Start philosophy;

   • assistance to parents during the application process;

   • communication in parents' preferred language;

   • when applicable, parental choice of program option; and

   • various methods through which parents learned about the program.

Family Partnership Building

2. In Head Start/Early Head Start we talk about the child and his/her family. Tell me about ways in which Head Start/Early Head Start has been supportive of the goals you have for your family, your child, and yourself.

   Listen for:

   • family-identified goals and program support for the goals;

   • referrals and follow-up;

   • interactions with families that acknowledge strengths and respect diversity and cultural background; and

• assistance to parents in learning advocacy skills.

3. Talk about how the program helps you prepare for your child's transition from Early Head Start to Head Start or from Head Start to public school.

    Listen for:

    • parent involvement in the transition process.

4. Tell me about the ways that you are involved in Head Start/Early Head Start and about what happens in your child's classroom.

    Listen for:

    • individual, as well as group activities;

    • a variety of program activities;

    • efforts to conduct these activities in ways respectful of the various languages spoken by families; and

    • a variety of strategies for making contact with families.

Prevention and Early Intervention/Follow-up Services

5. How does Head Start/Early Head Start work with you to make sure that your child has good health care and is developing well?

    Listen for:

    • parents becoming active partners in their child's health care;

    • links to ongoing accessible health care;

    • ongoing communication about health issues; and

    • referrals and follow-up for children with health problems or disabilities.

Curriculum, Assessment, and Individualization

6. Talk with me about the kinds of things your child is learning in the classroom. What kinds of things do you and your child's teacher talk about? Do you get a report that keeps you informed of your child's progress and accomplishments?

    Listen for:

    • information on how parents have input into the curriculum;

- a curriculum reflective of family cultures;

- families that participate in setting goals for their children;

- staff that address children's strengths and needs; and

- frequency of home visits and conferences.

Disabilities

7. Are you aware that your Head Start/Early Head Start program is serving children with disabilities? What have you seen teachers and staff do to support and involve those children and their families?

    Listen for:

    - parents who think children with disabilities are getting necessary services;

    - assistance to parents in communicating concerns and preferences to multidisciplinary teams;

    - involvement in development of IFSP/IEPs; and

    - coordination with other agencies.

Community Partnerships

8. How has Head Start/Early Head Start helped you connect with other community services and resources?

    Listen for:

    - referrals to appropriate community agencies;

    - access to programs for developing literacy skills, vocational skills, parenting skills, and advocacy and communication skills;

    - assistance to pregnant women in accessing comprehensive prenatal and postpartum care; and

    - examples of partnerships with other child care agencies and providers.

Program Governance

9. What opportunities do you have to discuss ideas or concerns you have about the program with other parents and staff?

Listen for:

- participation in Parent Committees;

- knowledge of work done by Policy Council/Policy Committee;

- examples of ideas or concerns that parents have taken to Parent Committees or policy groups; and

- inclusion of parents from Early Head Start and all program options in policy groups.

Facilities, Materials, Equipment, and Transportation

10. Talk with me about Head Start/Early Head Start buildings and the equipment and materials you have seen in the classrooms. Tell us about any transportation services that your child receives from the program.

    Listen for:

    - safe facilities and transportation services; and

    - appropriate and adequate materials.

CONCLUSION

Please share with us anything that you really like about Head Start/Early Head Start and want to see continue, as well as anything you would like to see changed or handled differently within Head Start/Early Head Start or your children's classrooms.

Thank you very much for taking the time to talk with us today.

Child Care Partnerships Interview Protocol

PURPOSE

- To understand the development, implementation, and future direction of the grantee's child care partnerships.

LOGISTICS

- **Duration:** The interview lasts from a half hour to 1 hour.

- **Review team participants:** At a minimum, a Systems Reviewer and a Service Reviewer conduct the interviews. The Systems Reviewer listens for issues of planning, communication, record-keeping, staff qualifications and training, ongoing monitoring, and fiscal management. The Service Reviewer listens for information about how services are delivered to children and families.

- **Child care partnership participants:** This interview is for directors or other lead staff members from child care programs that receive funds or resources from Head Start to serve children who are counted as "Head Start/Early Head Start" children.

- **Group size:** This interview may be done individually or with a group. If done in a group, a group size of 10–12 is recommended.

OPTION

This protocol may be combined with the Community Partnerships Interview Protocol, at the discretion of the team leader.

INTRODUCTION

I would like to talk with you about your experiences in partnering with Head Start/Early Head Start. My goal is to learn how Head Start/Early Head Start has worked with your agency, including things that have worked well and those areas in which you would like to see some improvement. We are here to work in partnership with the Head Start/Early Head Start grantee to help make the program the best it can be. There are no "wrong answers" here. We would just like to get a good picture of what the partnership is like.

Background and Nature of the Partnership

1. Tell me about the development of the partnership you have with this Head Start/Early Head Start program.

    Listen for:

    • history of the partnership;

    • goals for the partnership; and

    • shared planning.

2. Describe your agreement for this partnership.

    Listen for:

    • the responsibilities of each organization;

    • the form of the agreement (written or verbal); and

    • financial arrangements.

3. Describe the relationship between your agency's governing body or board (if any) and Head Start/Early Head Start's governing body.

    Listen for:

    • interaction between governing bodies; and

    • the nature of the interaction.

4. Describe how communication occurs between your organizations.

    Listen for:

    • types of information shared;

• strategies used for communicating; and

• procedures for addressing confidentiality.

5. Describe some activities conducted by you and/or the Head Start/Early Head Start program to ensure quality services.

    Listen for:
    • knowledge of Performance Standards and other regulations;

    • oversight and support from the Head Start/Early Head Start agency;

    • participation in program self-assessment;

    • ongoing monitoring to ensure that Performance Standards, child outcomes, and other regulations are met; and

    • opportunities for staff development.

6. What do you see as the major effects of this partnership?

    Listen for:

    • strengths of the partnership;

    • impact on service delivery, including classroom activities, health services, and services to children with disabilities and families; and

    • challenges.

Future Direction

7. What are the "next steps" in your partnership with Head Start/Early Head Start?

Community Partnerships
Interview Protocol

PURPOSE

- To understand the development, implementation, and future direction of the agency's community partnerships.

LOGISTICS

- **Duration**: The interview lasts no more than 1 hour. This interview may be used in conjunction with or instead of the Child Care Partnerships Interview.

- **Review team participants:** The team leader decides which reviewers conduct this interview. At a minimum, two reviewers, a Systems Reviewer and a Family and Community Partnerships Reviewer, attend the meeting. One reviewer facilitates, the other takes notes. Background information for this interview will be provided in the completed Community Partnerships Information Form and should be reviewed by the reviewers conducting this interview prior to meeting with the community partners.

- **Community partner participants:** This interview involves directors or other lead staff members from community agencies that are partners with Head Start/Early Head Start. Appropriate attendees may include directors from social services, mental health, LEAs, Part C agencies, health care providers, and other community partners.

- **Group size:** The interview may be done individually with a single partner agency or with a group representing several partners. A group of no more than 10–12 is recommended.

OPTION

This protocol may be combined with the Child Care Partnerships Interview Protocol, at the discretion of the team leader.

INTRODUCTION

Today we would like to talk with you about your experiences with Head Start/Early Head Start. Our goal is to learn how Head Start/Early Head Start has worked with your agency, including things that have worked well and those areas in which you would like to see some improvement. There are no "wrong answers" here. We would like to have a picture of how the partnership works. You have already filled out a form describing your role in the community and the nature of your relationship with this Head Start/Early Head Start program. We would like to focus our discussion today on the outcomes of that partnership.

1. What do you see as the major effects of your partnership with Head Start/Early Head Start?

    Listen for:

    • the effect on service delivery and access to resources for families, and

    • accomplishments that meet community needs.

2. For members of the Health Services Advisory Committee: How long have you been a member of the Health Services Advisory Committee? What sorts of issues has the Committee addressed this year?

3. For LEAs or Part C agencies: How do you work with Head Start/Early Head Start to support children with disabilities? What arrangements do you have to assist children and families in their transition from Head Start/Early Head Start?

Future Direction

4. What are the "next steps" in your partnership with Head Start/Early Head Start?

Policy Council Interview Protocol

PURPOSE

- To obtain information on how the grantee is engaged in shared decision-making with parents and community representatives on the Policy Council.

LOGISTICS

- **Duration:** The interview lasts no longer than 30 minutes.

- **Review team participation:** At a minimum, two reviewers, a Systems Reviewer and a family and community partnerships reviewer, attend the Policy Council meeting and conduct the interview. One reviewer facilitates; the other takes notes.

- **Grantee participation:** Policy Council members are invited to take part in the interview after the Policy Council meeting. Depending upon member availability after the meeting, a group interview may not be possible. In such a case, individual interviews with Policy Council members at other times during the review may be necessary.

- **Group size:** A group of no more than 10–12 is recommended.

INTRODUCTION

Thank you for letting us sit in during your Policy Council meeting. We learned some important things about program governance in your organization. Now we'd like to ask some additional questions to help us understand how your Policy Council works.

Policy Council Composition and Background

1. Tell us how you became a member of the Policy Council.

    Listen for:

    • election process.

2. Tell us about the Policy Council. How many people are on it? Whom do they represent?

    Listen for:

    • representation from Early Head Start/Early Head Start and all program options;

    • length of service on the Policy Council;

    • selection of community representatives; and

    • program support of Policy Council.

Functions of Policy Council

3. Was this meeting typical? In what ways? In what ways was it not typical?

    Listen for:

    • description of typical agenda items.

4. What kinds of things does the Policy Council do? Can someone describe a recent activity or project?

    Listen for:

    • approval of recruitment areas, program options, and program design;

    • involvement in the grant application and budget process, program planning, personnel decisions; and

    • involvement in the program's self-assessment process.

5. Describe any training that Head Start/Early Head Start has offered to you this year and last year.

    Listen for:

    • training on program governance, including roles and responsibilities of Policy Council members.

6. What kinds of information or documents does the agency provide to the Policy Council? What is the process of dealing with these?

    Listen for:

    • copies of program plans and policies;

    • financial reports;

    • relevant information from Head Start/Early Head Start; and

    • child outcomes data that describe patterns of accomplishments for groups of children.

7. What is the process for communicating with the governing body?

    Listen for:

    • ongoing communication; and

    • procedures for resolving disputes.

8. How does the Policy Council communicate with parents?

    Listen for:

    • opportunities for parents to express ideas and opinions to the Policy Council;

    • Policy Council encouragement of parent involvement; and

    • availability of child care and transportation for parents involved in Policy Council meetings.

Governing Body Interview Protocol

PURPOSE
- To describe how the governing body exercises its oversight responsibility and ensures accountability; and

- To describe how the governing body is knowledgeable about the Head Start/Early Head Start Program.

LOGISTICS
- **Duration:** The interview lasts no more than 30 minutes.

- **Review team participants:** The team leader determines which reviewers attend this interview. Generally, a Systems Reviewer leads this interview. Other available staff may attend, and one takes notes.

- **Agency participants:** Members of the agency's governing body are involved. This interview may be conducted in a group setting or with individual governing body members during the review.

- **Group size:** A group of no more than 10-12 is recommended.

INTRODUCTION

Thank you for taking time to talk with me about your role as a member of the governing body for Head Start/Early Head Start. We are interested in finding out just what the role of the governing body is for this grantee. First, we'll talk about how the governing body is involved in the grantee's overall planning process. Then, we'll discuss how the governing body exercises oversight and maintains accountability.

Planning and Communication

1. How do you learn what's expected of you as a member of the governing body in the Head Start/Early Head Start program?

    Listen for:

    • written policies that define the roles and responsibilities of governing body members; and

    • appropriate involvement in the grant application and budget process, program planning, personnel decisions, self-assessment, and selection of delegate agencies (if applicable).

2. Describe your ongoing working relationship and communication process with the Head Start policy group.

    Listen for:

    • examples of recent projects and communication;

    • reports; and

    • satisfaction with the relationship.

3. How and when are you and the policy group involved in the grantee's planning process? How are the timeframes and procedures for planning established?

    Listen for:

    • development of program goals and objectives.

4. How do you ensure that the policy group has had an opportunity to act on items that must be decided through shared decision-making, such as new hires or terminations?

    Listen for:

    • communication with Head Start/Early Head Start management staff.

5. What role do you and the policy group play in the self-assessment process?

    Listen for:

    - examples of activities conducted during most recent self-assessment; and

    - use of self-assessment results.

6. How does prior consultation occur on "must approve" issues before those issues are acted on by the full governing body? For example, how was the grant application presented to you? How did the process of approval work?

    Listen for:

    - examples of decisions approved during past year; and

    - satisfaction with the process.

7. How does the governing body (and policy group) participate in decisions about seeking new funding?

    Listen for:

    - description of the process used; and

    - satisfaction with the process.

Program Governance

8. What role does the governing body play in establishing or changing the composition of the policy group? In selecting community representatives?

    Listen for:

    - familiarity with the composition of the policy group; and

    - description of selection process.

9. What reporting is provided to you and the policy group to keep you informed about progress, problems, or changes needed in the program?

    Listen for:

    - types of reports received.

10. Do you currently receive reports describing patterns of progress and accomplishments for groups of children, i.e., child outcomes data?

    Listen for:

    • familiarity with the child outcomes initiative.

11. How do you exercise oversight and ensure accountability for program outcomes and fiscal integrity?

    Listen for:

    • communication with appropriate program staff; and

    • reporting process.

12. What written impasse procedures are in place? How were the policies developed?

    Listen for:

    • description of the procedures; and

    • process used to develop them.

Health and Safety Checklist

Classrooms/Centers Observed

A. _____

B. _____

C. _____

D. _____

This observation form will help you to record your observations regarding a number of health and safety issues. Items are not intended to be an exhaustive list of Performance Standards related to health and safety, but rather items that can be rated according to a "checklist" format.

This tool is intended to assist in answering Core Question #17 on Facilities, Materials, Equipment, and Transportation and Core Question #9a on Prevention and Early Intervention. In addition, information from this form may be useful to reviewers in other areas related to child development and health services. In order to obtain a complete picture of facilities and health and safety issues in the agency, it will be necessary to combine information from this instrument with information obtained from other observations and interviews.

Please indicate whether the item is supported by observations. Rate each item by placing a check under the appropriate center and/or classroom (space has been provided at the top of each page for you to indicate multiple center or classroom names). In addition, at the end of each section, space is provided for comments and observations in each area. Please use this page to describe any problems or concerns that you witnessed in the observation or to explain instances where items were not observed.

Area #1: Classrooms

Infant/Toddler

A.	B.	C.	D.

1. Sanitation and hygiene procedures for diapering have been adopted that adequately protect the health and safety of children served by the program and staff. [1304.22(e)(5)]

2. The diaper-changing area is located away from areas used for cooking, eating, or children's activities. [1304.53(a)(10)(xiv)]

3. Diapers are disposed of in a safe and sanitary manner. [1304.53(a)(10)(xvi)]

4. Infant sleeping arrangements use firm mattresses and avoid soft bedding materials, such as comforters, pillows, fluffy blankets, or stuffed toys. [1304.53(b)(3)]

5. Cribs are at least 3 feet apart from each other. [1304.22(e)(7)]

6. Infant toys are made of nontoxic materials and are sanitized regularly. [1304.53(b)(2)]

7. Toilet training equipment is available for children being toilet trained. [1304.53(a)(10)(xv)]

Comments:

Area #1: Classrooms (continued)

All Classrooms

	A.	B.	C.	D.

1. Nonporous gloves are available for use when dealing with bloody bodily fluids. [1304.22(e)(3)]

2. Staff promote effective dental hygiene among children in conjunction with meals. [1304.23(b)(3)]

3. Toys are stored in a "safe and orderly fashion" (e.g., in their assigned places, not out where people can trip over them). [1304.53(b)(1)(vii)]

4. The indoor and outdoor space for infants and toddlers is separated from general walkways and areas used by preschoolers. [1304.53(a)(4)]

5. Toys, materials, and furniture are safe, durable, and in good condition (e.g., materials free of sharp edges and loose pieces, balloons and/or plastic bags not used, no choking hazards). [1304.53(b)(1)(vi)]

6. Center space is organized into functional areas that can be recognized by children and that allow for individual activities and social interactions. [1304.53(a)(3)]

7. Staffing patterns support regulations regarding class size and number of adults per class. [1306.20]

8. Staff, volunteers, and children wash their hands with soap and running water after diapering or toilet use, before food-related activities, whenever hands are contaminated with blood or other bodily fluids, and after handling pets or other animals. Staff and volunteers also wash their hands with soap and running water before and after giving medications, before and after treating or bandaging a wound, and after assisting a child with toilet use. [1304.22(e)(1)–(2)]

Comments:

Area #2: Indoor Facilities

Sanitation/Hygiene

A.	B.	C.	D.

1. Facilities are available for the proper storage and handling of breast milk and formula. [1304.23(e)(2)]

2. Bathroom facilities are clean, in good repair, and easily reached by children. [1304.53(a)(10)(xiv)]

3. Bathroom facilities are separated from areas used for cooking, eating, or children's activities. [1304.53(a)(10)(xiv)]

4. Indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions. [1304.53(a)(10)(viii)]

5. Garbage and trash are stored and disposed of in a safe, sanitary manner. [1304.53(a)(10)(xvi)]

6. A utility sink is specifically used to clean potties. [1304.22(e)(6)]

Comments:

Area #2: Indoor Facilities (continued)

Safety

A.	B.	C.	D.

1. The facility has approved, working fire extinguishers and an appropriate number of smoke detectors that are tested regularly. [1304.53(a)(10)(v), 1304.53(a)(10)(vi)]

2. Windows and glass doors are constructed, adapted, or adjusted to prevent injury to children. [1304.53(a)(10)(xii)]

3. Electrical plugs accessible to children are covered. [1304.53(a)(10)(xi)]

4. The heating/cooling system is insulated to protect children and staff from potential burns. (Note: Look at pipes and/or radiators.) [1304.53(a)(10)(i)]

5. There is an absence of highly flammable furnishings, decorations, or materials that emit toxic fumes. [1304.53(a)(10)(ii)]

6. Flammable and other dangerous materials/poisons are stored in locked cabinets or facilities separate from medications and food and accessible only to authorized persons. [1304.53(a)(10)(iii)]

7. Appropriate licenses (water/sewage, food/sanitation, fire codes, and vendor/contractor licenses) are seen. [1304.53(a)(6) and (10)(xiii), 1304.23(e)(1), 1306.30(c)]

Comments:

Area #2: Indoor Facilities (continued)

Facility Layout and Environment

A.	B.	C.	D.

1. If necessary, there is a safe and effective heating and cooling system. [1304.53(a)(10)(i)]

2. There is at least 35 sq. ft. of usable indoor space per child (not including bathrooms, halls, kitchen, staff rooms, and storage places). [1304.53(a)(5)]

3. Facilities enable the safe and effective participation of children with disabilities. [1308.4(o)4]

4. Rooms are well lit. [1304.53(a)(10)(iv)]

Comments:

Provisions for Emergencies

A.	B.	C.	D.

1. Exits and/or evacuation routes are clearly marked. [1304.22(a)(3), 1304.53(a)(10)(vii)]

2. Emergency lighting is available. [1304.53(a)(10)(iv)]

3. Emergency telephone numbers (e.g., EMS, Fire, Police, Poison Control) are clearly posted. [1304.22(a)(2)]

4. Policies and plans of action for emergencies that require rapid response on the part of staff (e.g., a child choking) or immediate medical or dental attention are clearly posted. [1304.22(a)(1)]

5. A well-supplied first-aid kit is available, accessible to staff, and out of reach of children. [1304.22(f)(1)]

Comments:

Area #2: Indoor Facilities (continued)

Medication Administration

A.	B.	C.	D.

1. All medications are properly labeled (i.e., name of child/staff, name of medication, dosage, name/number of pharmacy/physician). [1304.22(c)(1)]

2. Medications are under lock and key and out of reach of children. [1304.53(a)(10)(iii), 1304.22(c)(1)]

3. Medications in need of refrigeration are refrigerated. [1304.22(c)(1)]

Comments:

Area #3: Outdoors

A.	B.	C.	D.

1. There is at least 75 sq. ft. of usable outdoor space per child. [1304.53(a)(5)]

2. The playground equipment is in good repair and safe condition (e.g., adequately secured to the ground, free of sharp edges and/or splinters, soft falling surface). [1304.53(a)(7), 1304.53(a)(10)(viii), 1304.53(a)(10)(x)]

3. The outdoor play area is arranged such that no child can leave the premises or get into unsafe or unsupervised areas. [1304.53(a)(9)]

Comments:

Fiscal Checklist

INSTRUCTIONS FOR COMPLETING THE FISCAL CHECKLIST:

This checklist is designed to assist you in monitoring the fiscal health of the grantee and any delegate agencies (as applicable). The checklist is divided into three sections (with all questions receiving either a "Yes" or "No" answer). The answers to the questions in the first two sections will help you, in the third section, assess fiscal health in each of two major areas:

1. Internal Controls [45 CFR Parts 74.21(b)(3), 92.20(b)(3)]; and
2. Governance [45 CFR Part 1304.50(g)(2)].

These two major areas receive substantial emphasis because, together, effective internal controls and governance help grantees ensure successful and efficient operations of their own programs (and those of their delegates), reliable financial reporting, and compliance with applicable laws and regulations.[1]

The first section of this checklist (Section I) includes 24 questions that serve as indicators (i.e., "Red flags") designed to help identify underlying fiscal problems. Circle "Y" (yes) or "N" (no) when answering each question. Responses with red flags immediately below them might indicate an underlying fiscal problem. (For several of the questions, one or more follow-up questions appear that are related to the main question. Answer these questions as directed.) After completing the first section, refer back to the questions with "red flag" responses to gain a preliminary sense of the fiscal health of the grantee (and/or its delegates) and to identify areas that may need additional attention.

The second section of this checklist (Section II) includes 28 questions that directly assess compliance with specific program requirements (i.e., each question contains citations to the regulation(s) and/or Office of Management and Budget (OMB) Circulars that are applicable to the respective question). Circle "Y" (yes) or "N" (no) when answering each question. (For several of the questions, one or more follow-up questions appear that are related to the main question. Answer these questions as directed.) If a red flag appears under the response that you circled, and if the weight of the answers to the main and follow-up questions (if applicable) suggest the grantee/delegate is not in

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[1] For a detailed discussion of these issues see General Accounting Office (1999), *Standards for Internal Control in the Federal Government (GAO/AIMD-00-21-3.1)*, November; and Committee of Sponsoring Organizations of the Treadway Commission (COSO), *Internal Control - Integrated Framework* (May 1994).

compliance with the specified requirement(s), place a check in the box under the "Potential Area of Noncompliance" heading.

Toward the end of the fiscal review (i.e., after you have completed Sections I and II of the checklist, gathered all relevant information from document reviews and interviews, and followed up on all outstanding issues), turn your attention to the two major areas identified above (i.e., internal controls and governance). These items also appear in question form in Section III (page 25). For each of these items on page 25, place a check in the box under the "Potential Area of Noncompliance" heading if the weight of the evidence you collected (including the answers to the questions in Sections I and II of the checklist) suggests that the grantee/delegate is not in compliance with the specified requirement.

Under the "Documents Reviewed" column, list the evidence, in the form of documents, you gathered and reviewed to support your conclusion. Under the "People Interviewed" column, list the individuals you interviewed when answering the checklist questions, and in the "Additional Comments" column, write any additional remarks that pertain to the question.

In answering the questions on this checklist, some of the documents you might find useful to review include:

· current and prior financial statements from the audit report,
· most recent financial reports as delivered to the governing bodies,
· Policies and Procedures manual(s) covering fiscal operations (e.g., written accounting procedures and procurement procedures),
· detailed general ledger or accounts payable (AP) disbursements journal,
· monthly trial balances,
· bank reconciliations,
· administrative costs documentation,
· program budget planning documents (e.g., forms, memorandums, work papers, GABI, and grant proposals),
· chart of accounts,
· property inventory and files for recent major purchases,
· audit reports and the management letter that accompanies the audit report (including the most recent),
· relevant IRS documents (e.g., IRS 941, IRS 990)
· current and prior year Financial Assistance Award (FAA),

· notice of grant award,
· indirect cost agreement and/or cost allocation plan,
· lease agreements,
· codes of conduct from personnel policies,
· organizational chart or list of staff and function of each staff person, including any vacancies,
· payroll journal and/or payroll service summary,
· most recent SF-269, with supporting documentation,
· PMS-272 with supporting documentation from the past four quarters,
· insurance policies (e.g., liability, vehicles, child accident),
· interagency agreements,
· Non-Federal share documentation,
· Department of Agriculture (USDA) accounting records and source documents (e.g. meal counts, etc.),
· Vendor contracts,
· grantee charter document,
· delegate agencies and other partnership contracts as required.

*   *Please note that questions 12, 27, 40, and 50 apply to grantees only, and question 45 is only applicable to private non-profits.*

SECTION I

				Documents Reviewed	People Interviewed	Additional Comments
1	Y	N	Is the ratio of current assets to current liabilities less than 1 (i.e., are there insufficient funds to pay debts due within a year)? [If yes, please answer the question below. If no, go to question 2.]			
	Y	N	Has the ratio decreased over the past three years?			
2	Y	N	Has the grantee borrowed money within the last 12 months?			
3	Y	N	Has the amount of cash reported on the balance sheet (per audit report) decreased over the past three years?			
4	Y	N	Have vendor payments been late?			
5	Y	N	Does the most recent audit contain a disclosure (footnote) regarding cash flow status?			

SECTION I

				Documents Reviewed	People Interviewed	Additional Comments
6	Y	N	Does the most recent audit show any programs with negative operating balances?			
7	Y	N	Are there large unfunded liabilities (e.g., annual and sick leave accruals, taxes payable, 401(k) payments outstanding, large mortgage, or large line-of-credit payments) or recent significant cost increases?			
8	Y	N	Have the grantee and/or delegates provided adequate documentation to demonstrate timely payment of employee benefits (i.e., Federal and state taxes, health and retirement contributions)?			
9	Y	N	Are the grantee and/or delegate named in pending or recent litigation? Are there pending or current disallowances from any funding source such as USDA, CSBG, or child care? [Obtain this information through interviews with staff.]			
10	Y	N	Is there any indication the agency may lose one or more major programs and/or funding sources?			

SECTION I

			Documents Reviewed	People Interviewed	Additional Comments
11	Y	N	Does the Federal tax information reported agree with other financial reports? (Specifically, is the tax information on the IRS 990 in agreement with the audit report?)		
12	Y	N	[THIS QUESTION APPLIES TO THE GRANTEE ONLY] Does the final SF-269 reconcile with the appropriate quarterly PMS-272 for the same period?		
13	Y	N	Do bank statements reflect any negative cash balances, over-draft, or finance charges?		
14	Y	N	Has there been a recent reduction of program staff or services, a shift towards outsourcing, excessive turnover of supervisory staff, or have key personnel quit unexpectedly?		
15	Y	N	Does the agency maintain a complete and up-to-date list of all employees?		
16	Y	N	Are separation/termination of employment instances immediately reported to the payroll department?		

SECTION I

	Documents Reviewed	People Interviewed	Additional Comments
17 Y N ⚑ Have positions been vacant for a significant period of time (i.e., more than 90 days)?			
18 Y N ⚑ Are original time records properly prepared and properly approved by supervisors?			
19 Y N ⚑ Are payroll records regularly compared with the records of the personnel department?			
20 Y N ⚑ Are there written accounting procedures?			
21 Y N ⚑ Are there specific procedures for maintaining checks and balances for cash management and other fiscal functions? [To assist in answering this question, consider the questions below.]			
Y N Are cash and negotiable securities under lock and key, and is access to them strictly controlled?			

SECTION I

				Documents Reviewed	People Interviewed	Additional Comments
Y	N	Are forms such as blank checks and purchase orders sequentially pre-numbered, physically secured, and is access to them strictly controlled?				
Y	N	Are mechanical check signers and signature plates physically protected, and is access to them strictly controlled?				
Y	N	Is one individual allowed to control all key aspects of a transaction or event?				
Y	N	Are duties assigned systematically to a number of individuals to ensure that effective checks and balances exist?				
Y	N	Does the grantee have internal controls for mail processing, cash receipts, and cash disbursements?				
Y	N	Are all grantee bank statements reconciled on a monthly basis?				

SECTION I

	Documents Reviewed	People Interviewed	Additional Comments
Y N Are there safeguards in place for financial data systems in the event of data failure?			
Y N Are changes in payroll properly authorized?			
22 Y N ⚑ Are there compliance findings over internal controls in the current audit? [If yes, please answer the question below. If no, go to question 23.]			
Y N Have the findings been corrected or is there a corrective action plan in place?			
23 Y N ⚑ Did a review of year-end payments disclose any unusual or irregular items (e.g., large purchases of supplies or equipment or pay out of end-of-year "bonuses")?			
24 Y N ⚑ Do the grantee and/or delegate agencies have policies and procedures for the use of credit cards (e.g., require documentation for expenditures, regularly monitor expenditures, and impose other clear spending limits)?			

SECTION II

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
25 Y N ⚑ Have Head Start funds been drawn down in excess of documented cash requirements? [45 CFR Parts 74.22(b)(2), 92.21(c)]	☐			
26 Y N ⚑ Have prior year salaries or other prior year costs been charged to the current budget year? [45 CFR Parts 74.28, 92.23(a)]	☐			
27 Y N ⚑ [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Has the grantee submitted timely and accurate SF-269s and PMS-272s? [45 CFR Parts 1304.51(h)(2), 74.52(a)(1)&(2), 92.41(b)&(c)]	☐			
28 Y N ⚑ Have Head Start funds been used to cover costs normally paid by other funding streams (i.e., interfund borrowing)? [45 CFR Parts 74.27(a), 92.22(a)(1)&(2), 92.22(b)]	☐			
29 Y N ⚑ Does the grantee have a qualified fiscal officer? [45 CFR Part 1304.52(d)(8)]	☐			

SECTION II

		Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
30 Y N ⚑	Are any staff making in excess of $100,000? [Consider gross pay from all funding sources.]	☐			
31 Y N ⚑	Are the wages of staff (including those identified in question 30 above) reasonable and supported by appropriate wage comparability data? [OMB Circulars A-122 (Attachment B, Item 8 (c)), A-87 (Attachment B, Item 8 (b))]	☐			
32 Y N ⚑	Did the grantee award COLA/Quality funds in compliance with the terms of its grant application? [45 CFR Parts 74.21(b)(3), 92.20(b)(3)]	☐			
33 Y N ⚑	Are there appropriate internal controls for payroll checks distributed to employees? [45 CFR Parts 74.21(b)(3), 92.20(b)(3)&(6)]	☐			
34 Y N ⚑	If the grantee has shared costs, has the grantee used an allocation base that best measures the relative degree of benefit for all benefiting functions? [45 CFR Part 92.20(b)(5), OMB Circulars A-122 (Attachment A, subsection	☐			

SECTION II

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
D.1b), A-87 (Attachment A, subsection C.3), and A-21 (Section C, subpart 4)]				
35 Y N 🚩 Does the grantee regularly compare budgeted costs to actual costs? [45 CFR Parts 74.21(b)(4), 92.20(b)(4)]	☐			
36 Y N 🚩 Do the Policy Council and Policy Committees work in partnership with key management staff and the governing body to develop, review, and approve or disapprove all procedures for refunding applications and amendments to refunding applications for Early Head Start and Head Start, including administrative services, prior to the submission of such applications? [45 CFR Part 1304.50(d)(1)(i)]	☐			
37 Y N 🚩 Are financial reports current and available upon request? [45 CFR Parts 1304.51(h)(1)&(2), 74.21(b)(1)&(2), 74.53(b), 92.20(b)(1)&(2)]	☐			

SECTION II

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
38 Y N 🚩 Have the grantee and delegate agencies failed to submit timely and accurate IRS 941, IRS 990 and other official reports as required? [45 CFR Part 1304.51(h)(2)]	☐			
39 Y N 🚩 Has there been a failure to disseminate timely and accurate fiscal information to the management staff, governing body, and policy groups? [45 CFR Parts 1304.51(d)(3), 1304.51(h)(1)]	☐			
40 Y N 🚩 [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Has the grantee implemented procedures for programmatic and fiscal monitoring of its own operations and each of its delegates? [45 CFR Part 1304.51(i)(2)]	☐			
41 Y N 🚩 Have the grantee and/or delegate agencies made changes to the budget that required prior approval before receiving such approval in writing? [45 CFR Parts 74.25, 92.30][Select subsection(s) of 45 CFR Parts 74.25 and/or 92.30 that are appropriate to the circumstance.]	☐			

SECTION II

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
42 Y N ⚑ Was the last required annual audit not completed and/or not submitted timely and/or unavailable? [OMB Circular A-133 (Subpart B.220), 45 CFR Parts 1301.12(a), 74.53(b), 92.42]	☐			
43 Y N ⚑ Has the grantee corrected previous audit findings? [OMB Circular A-133 (Subpart C.315, Paragraphs (a) & (b))]	☐			
44 Y N ⚑ Has the grantee implemented procedures to determine allowability, allocability, and reasonableness of costs as required? [45 CFR Parts 74.21(b)(6), 92.20(b)(5)]	☐			
45 Y N ⚑ [THIS QUESTION APPLIES TO PRIVATE NON-PROFITS ONLY] Does the grantee fail to have the required insurance coverage? [45 CFR Parts 1301.11, 74.31. (Not applicable for grantees subject to Part 92, who are generally self-insured.)] [Select subsection(s) of 45 CFR Part 1301.11 that are appropriate to the circumstance.]	☐			

SECTION II

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
46 Y N 🚩 Does the grantee meet property management standards for nonexpendable personal property, including conducting a physical inventory at least once every 2 years and having all vehicle titles available? [To assist in answering this question, first consider the questions below.] [45 CFR Parts 74.30, 74.33(a)(1), 74.34(f)(1)(ix)(3), 92.31-92.32]	☐			
Y N Is equipment vulnerable to theft, not securely fastened, or not protected in some other manner?				
Y N Are identification plates and numbers affixed to office furniture and fixtures, equipment, and other portable assets?				
47 Y N 🚩 Does the grantee have inadequate supplies or materials or outdated equipment? [45 CFR Part 1304.53(b)(1)]	☐			

SECTION II

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
48 Y N ⚑ Are costs for development and administration necessary and of benefit to the program, properly allocated and documented, and not in excess of 15% of total costs unless a waiver has been granted? [45 CFR Part 1301.32] [Select subsection(s) of 45 CFR Part 1301.32 that are appropriate to the circumstance.]	☐			
49 Y N ⚑ If the grantee and/or delegate agencies charge indirect costs, are these costs supported by a current negotiated indirect cost rate? [OMB Circulars A-122 (Attachment A, Paragraph E.2.c. & g.), A-87 (Attachment A, Paragraph H), and A-21 (Section G, subpart 11.g)]	☐			
50 Y N ⚑ [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Did the use of Federal funds in the grantee's last budget exceed 80% of the total cost without a waiver? [45 CFR Parts 1301.20(a), 1301.21(a)&(b)]	☐			

SECTION II

			Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments
51 Y N 🚩		Do the source, use, and accounting of non-Federal funds meet the same requirements as Federal funds, and is the accounting of funds supported by proper source documents? [45 CFR Parts 74.23, 92.24][Select subsection(s) of 45 CFR Parts 74.23 and/or 92.24 that are appropriate to the circumstance.]	☐			
52 Y N 🚩		Are any of the procurement transactions conducted in a manner that does not provide for open and free competition? [45 CFR Parts 74.43, 92.36(c)]	☐			

SECTION III

	Potential Area of Noncompliance (✔)	Documents Reviewed	People Interviewed	Additional Comments

Place a check in the box under the "Potential Area of Noncompliance" heading if the weight of the evidence you collected during this review (including the answers to the questions in Sections I and II of the checklist) suggests that the grantee/delegate is not in compliance with the specified requirement:

53	Grantee lacks effective control over and accountability for all grantee and/or delegate funds, property, and other assets. [45 CFR Parts 74.21(b)(3), 92.20(b)(3)]	☐		
54	Governing body does not ensure that appropriate internal controls are established and implemented to safeguard funds. [45 CFR Part 1304.50(g)(2)]	☐		

Transportation Services Checklist

Grantee Name _____**Date/Time** _____

Reviewer_____ **Service Area** _____

Sources of Information Used _____

WHAT'S NEW FOR 2005

The Transportation Services Checklist, formerly the Bus Ride Checklist, has been revised and reformatted. The Head Start Transportation Performance Standards apply to all Head Start grantees and their delegates. This checklist is designed for use on **all** PRISM reviews, whether the grantee or delegate agency provides transportation services or not.

The information gathered will be based on bus ride(s), interviews, observations, and document reviews. There are several design changes to the checklist that will help you in your role as a reviewer.

1. The checklist has been numbered for easy reference and separated into four categories:

   • Facilities, Materials, Equipment and Transportation (Questions 1-13)
   • Early Childhood Development and Health Services (Questions 14-22)
   • Family and Community Partnerships (Questions 23-27)
   • Program Design and Management (Questions 28-40)

2. The questions marked with ◆ apply to **all** Head Start grantees and their delegates, whether they provide transportation services or not. These items appear in questions 13-15, 17, and 26-30.

3. The questions marked with 🚌 may be observed on bus ride(s).

Team Leaders: You may assign specific items or categories on the checklist to reviewers based on their scheduled activities throughout the week.

TRANSPORTATION SERVICES CHECKLIST

Facilities, Materials, Equipment, and Transportation

Yes **No**

____ ____ 1. Each vehicle used in providing transportation services has:
- a communication system to call for assistance;
- emergency safety equipment, including a charged fire extinguisher properly mounted near the driver's seat and a sign indicating its location;
- a first aid kit and a sign indicating its location; and
- a seat belt cutter and a sign indicating its location. [1310.10(d)(1-4)]

____ ____ 2. Any auxiliary seating used in vehicles providing transportation services has been built into the vehicle by the manufacturer as part of its standard design, maintained in proper working order, and inspected annually. [1310.10(e)]

____ ____ 3. Baggage and other items transported in the passenger compartment are properly stored and secured, aisles remain clear, and doors and emergency exits are unobstructed at all times. [1310.15(b)]

____ ____ 4. There are procedures in place to ensure that the bus or alternative allowable vehicle is maintained in safe operating condition. The organization operating the vehicle has established and implemented procedures for:
- an annual safety inspection through an inspection program licensed or operated by the State;
- systematic preventive maintenance; and
- a daily pre-trip inspection by the driver. [1304.53(a)(7), 1310.13]

____ ____ 5. Each vehicle is not required to back up or make "U" turns, except if necessary for safety reasons or because of physical barriers. [1310.20(b)(3)]

____ ____ 6. Trip stops minimize traffic disruptions and afford the driver a good field of view in front and behind the vehicle. [1310.20(b)(4)]

Facilities, Materials, Equipment, and Transportation (cont.)

Yes   **No**

____   ____   7.   There are specific procedures for use of alternate routes in the case of hazardous conditions that could affect the safety of the children who are being transported. [1310.20(b)(7)]

____   ____   8.   Transit times for children going to and from the program do not exceed one hour each way unless there is no shorter route available or any alternative shorter route is either unsafe or impractical. [1310.20(b)(1)]

____   ____   9.   When possible, stops do not require children to cross the street or highway when boarding or exiting the vehicle. [1310.20(b)(5)]

____   ____   10.   If children must cross the street before boarding or after leaving the vehicle, the children are escorted across the street by the bus monitor or another adult. [1310.20(b)(6)]

____   ____   11.   The number of occupants in the vehicle does not exceed maximum passenger capacity at any time. [1310.20(b)(2)]

____   ____   12.   All vehicle occupants (except for the bus monitors who are assisting children) are seated in height- and weight-appropriate restraint systems while the vehicle is in motion. [1310.15(a), 1310.15(d)]

Exception: Approval letter from the Head Start Bureau is required for an extension of the effective date of the portion of the Head Start regulation relating to child safety restraint systems up to January 20, 2006.

____   ____   13.   ◆ Children are only released to a parent, legal guardian, or other individual as designated in writing by the parent or legal guardian. The agency maintains lists of the persons, including alternates in case of emergency, and up-to-date child rosters are maintained 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)]

Comments:

Early Childhood Development and Health Services

Yes   **No**

____   ____   14. ◆ Children receive developmentally appropriate safety training within 30 days of the start of the program year on:
- safe riding practices;
- safety procedures for boarding and leaving the vehicle;
- safety procedures in crossing the streets to and from the vehicle at stops;
- recognition of danger zones around the vehicle; and
- emergency evacuation procedures, including participation in an emergency evacuation drill conducted on the vehicle the child will be riding. [1310.21(a), 1310.21(b)(1)-(5)]

____   ____   15. ◆ Children's safety training reminder activities have been developed and are developmentally appropriate, individualized, and an integral part of program activities. [1310.21(e)]

____   ____   16.   At least two bus evacuation drills in addition to the one required to be provided within the first thirty days of service have been conducted during each program year. [1310.21(b)(5), 1310.21(d)]

____   ____   17. ◆ Grantee and delegate agencies have arranged for or provide transportation for children with disabilities to and from the program and to special clinics or other service providers when the special education and related services cannot be provided on-site. [1308.4(h)(6), 1310.22(b)]

____   ____   18. 🚌 Up-to-date family contact information and authorization for emergency care for each child is readily available. [1304.22(a)(2), 1304.51(g)]

____   ____   19.   Appropriate staff is informed of any health or safety accommodations or adaptations needed for children in accordance with the program's confidentiality policy. [1304.22(b)(3)]

Early Childhood Development and Health Services (cont.)

Yes   **No**

_____   _____   20.   The agency must establish, maintain, and implement written procedures regarding the administration, handling, and storage of medication for every child. [1304.22(c)]

_____   _____   21.   Bus drivers and monitors encourage self-control by using positive methods of child guidance by setting clear, consistent limits. [1304.21(a)(3)(i)(C), 1304.52(h)(1)(iv)]

_____   _____   22.   Routines and transitions occur in a timely, predictable, and unrushed manner according to each child's needs. [1304.21(a)(3)(ii)]

Comments::

Family and Community Partnerships

Yes **No**

_____ _____ 23. Effective two-way communication between staff and parents is facilitated on a regular basis throughout the program year. [1304.51(c)(1)]

_____ _____ 24. Interactions with families are respectful. [1304.40(a)(5)]

_____ _____ 25. Communication with parents is conducted in the parents' primary or preferred language or through an interpreter, to the extent feasible. [1304.40(a)(5)]

_____ _____ 26. ◆ Parents receive safety training within 30 days of the start of the program year that:
   • emphasizes the importance of escorting their children to the vehicle stop and reinforcing the vehicle safety training.
   • complements the training provided to their children so that safety practices can be reinforced both in the program and at home by the parent. [1310.21(a), 1310.21(c)]

_____ _____ 27. ◆ Reasonable efforts are made to coordinate transportation resources with other human services agencies in the community. [1310.23(a)]

Comments:

Program Design and Management

Yes **No**

____ ____ 28. ◆ The agency assists as many families as possible who need transportation in order for their children to attend the program in obtaining that transportation. [1310.10(a)]

____ ____ 29. ◆ The specific types of transportation assistance being offered are made clear to all prospective families in the program's recruitment announcements. [1310.10(b)]

____ ____ 30. ◆ If the agency has decided not to provide transportation services, either for all or a portion of the children, the agency provides reasonable assistance to the families of such children to arrange transportation to and from its activities. [1310.10(b)]

____ ____ 31. If the agency provides transportation through an arrangement with another organization or individual, the agency has ensured compliance of the transportation provider with the Head Start regulations. [1310.10(c)]

____ ____ 32. Each vehicle purchased after February 20, 2001 is a school bus or an allowable alternate vehicle equipped for use of height- and weight-appropriate child safety restraint systems and with a reverse beeper. [1310.10(c)]

____ ____ 33. All accidents involving transportation services are reported in accordance with applicable State requirements. [1310.10(f)]

____ ____ 34. Where available in the State or jurisdiction, each driver has a valid Commercial Driver's License (CDL) for vehicles in the same class as the vehicle the driver operates. [1310.16(a)(1)]

____ ____ 35. In accordance with the applicant review procedures, bus drivers' driving records have been checked through the appropriate State agency, including the National Driver Register, if available in the State. [1310.16(b)(2)]

Program Design and Management (cont.)

Yes   **No**

____ ____ 36. Each bus driver has received a combination of classroom and behind-the-wheel training prior to transporting any child enrolled in the agency's program, and refresher training annually, on how to:

• operate the vehicle safely and efficiently;

• safely run a fixed route, including loading and unloading children, stopping at railroad crossings and performing other specialized driving maneuvers;

• administer basic first aid;

• handle emergency situations, including vehicle evacuation procedures;

• operate any special equipment, such as wheelchair lifts, assistance devices or special occupant restraints;

• conduct routine vehicle maintenance and safety checks; and

• maintain accurate records as necessary. [1310.17(a), 1310.17(b)(1)-(7)]

____ ____ 37. Bus drivers receive annual evaluations, which must include an on-board observation of road performance. [1310.17(f)(1)]

____ ____ 38. At least one bus monitor is on board at all times. [1310.15(c)]

Exception: Approval letter from the Head Start Bureau is required for an extension of the effective date of the portion of the Head Start regulation relating to bus monitors up to January 20, 2006.

Program Design and Management (cont.)

Yes   No

____   ____   39.   Each bus monitor has been trained prior to duty on:
• child boarding and exiting procedures;
• use of child restraint systems;
• any required paperwork;
• responses to emergencies;
• emergency evacuation procedures;
• use of special equipment;
• child pick-up and release procedures;
• pre- and post-trip vehicle check. [1310.17(f)(2)]

Exception: Approval letter from the Head Start Bureau is required for an extension of the effective date of the portion of the Head Start regulation relating to bus monitors up to January 20, 2006.

____   ____   40.   Each agency has identified the true cost of providing transportation in order to knowledgeably compare the costs of providing transportation directly versus contracting for the service. [1310.23(b)(1)]

Comments:

Classroom, Family Child Care, or Socialization Experience Observation Instrument

SETTING 1

Setting:_____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

SETTING 2

Setting:_____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

This instrument is designed to guide service reviewers' observations in each focus child's group setting (i.e., classroom, family child care home, or home-based socialization experience). The form contains a page for each of the concepts. Each concept highlights the Performance Standards and other regulations relevant to the concept.

The form provides space to write observations for two settings, one child per setting. Use the spaces labeled "Setting One" and "Setting Two" to take notes about what you see and hear in relation to each concept for your focus child. Make photocopies of these forms to record observations for additional focus children.

- What are the children doing, saying, and using?

- What are teachers and other staff doing, saying, and using?

- What is the environment like? How do the equipment and materials in the environment support each concept?

However, you will not be able to observe all of the concepts listed, so you may find it helpful to ask some additional questions of each teacher in whose classroom you observe. Before you begin your conversation, ask the teacher to show you the following:

- a copy of the curriculum specific to infants, toddlers, or preschoolers;

- examples of the tools used in the assessment system;

- the focus child's file (may include the developmental screening, assessment data, and individualization plans); and

- planning documents.

INTERVIEW QUESTIONS	NOTES

We'd like to talk to you about your understanding of the curriculum, how you learn about children's progress, and how you plan for the children.

- How do you adapt the curriculum for use in your classroom? How do you connect what you learned about *(focus child)* to what you are teaching him/her?

- How do you integrate issues of health, nutrition, and mental health into the curriculum? How do you prepare children for transitions? Can you provide an example?

- What developmental screening tool do you use? Are you involved in the process of conducting the developmental screening? If you're not, how do you get the results? How does the program use the information from *(focus child's)* screening?

- When screening results in a child having an IEP or IFSP, how do you use that plan in your work with that child? How do you use the information from *(focus child's)* assessments to work with him/her individually? Can you show us an example of how you do that?

- How often do you assess children? How do you use the assessment information you have gathered for *(focus child)* to learn about his/her progress? How do you communicate this information to his/her parents?

- How are *(focus child's)* parents involved in the planning and implementation of the curriculum to individualize for their child?

- If the focus child is a child with disabilities, ask: How are *(focus child's)* parents involved in the planning for their child's IEP?

- For 3- to 5-year-old classrooms, ask: How does your curriculum respond to the Head Start Outcomes Framework?

Classroom, Family Child Care, or Socialization Experience Observation Instrument

REVIEWER	COMMENTS

At least one child development or disabilities services reviewer should read the written curriculum for the following:

- goals for children's development and learning;

- experiences through which children will achieve these goals;

- what staff and parents do to help children achieve these goals;

- the materials needed to support the implementation of the curriculum;

- consistency with the *Head Start Program Performance Standards* and other regulations;

- a base of sound child development principles about how children grow and learn;

- for preschool classrooms, inclusion of the eight domains of development and learning and the required domain elements and indicators (e.g., associates sounds with written words, recognizes a word as a unit of print, and phonological awareness).

Questions:

NOTES

ISSUES, QUESTIONS, AND FOLLOW-UP:

1. TEACHER INTERACTIONS AND STRATEGIES

- adults using a variety of intentional strategies that vary in complexity;
- supervision of all indoor and outdoor activities;
- positive child guidance and appropriate limits.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	*Setting 1:*	*Setting 2:*
- child-initiated and adult-directed activities; - individual and small group experiences; - children exploring and making choices; - timely, predictable, and unrushed routines and transitions; - talking to babies, singing and playing with them during diaper changes, mealtimes, and other routines.		

ISSUES, QUESTIONS, AND FOLLOW-UP:

2. FACILITATING CHILDREN'S LANGUAGE AND LITERACY DEVELOPMENT

- language use and interaction among and between children and adults;
- adults fostering children's communication, including home language;
- experiences that develop auditory and visual discrimination;
- experiences that support creative expression;
- experiences that develop school-readiness skills in literacy.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	*Setting 1:*	*Setting 2:*
- alphabet posters, puzzles, and books; - examples of functional print and other materials in appropriate places: mailboxes, sign-in charts, maps, helper charts, and schedules; - opportunities for children to write and dictate stories and messages; - art, music, rhyming songs, and movement; - learning activities such as games, puzzles, and books that promote knowledge of letters (alphabet) and sounds; - adults reading and discussing stories one-on-one and in small groups; - children choosing books to look at alone, to share with a friend, or to take home; - adults and children asking questions and engaged in meaningful conversations; - experiences, materials, conversation and activities that support the language used at home and English as a second language.		

ISSUES, QUESTIONS, AND FOLLOW-UP:

3. FACILITATING CHILDREN'S MATH AND SCIENCE DEVELOPMENT

- experiences that develop skills in mathematics and science;
- experiences that develop auditory and visual discrimination;
- opportunities for children to discover how numerical concepts relate to other concepts.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	Setting 1:	Setting 2:
- puzzles, games, unit blocks, and manipulatives that range in complexity; - materials and experiences that develop counting, sequencing, and one-to-one correspondence; - materials and experiences that encourage understanding of cause and effect and spatial relationships, such as a map in the block area; - opportunities for children to discover how mathematical concepts relate to other concepts, for example measuring or weighing; - opportunities for children to count, classify, sequence, sort, and match; - children experimenting, describing, and making predictions; - children using recipes for making snacks; - children caring for plants and animals, and learning about science in their surroundings; - adults asking children questions in ways that extend their thinking.		

ISSUES, QUESTIONS, AND FOLLOW-UP:

4. FACILITATING CHILDREN'S SOCIAL AND EMOTIONAL DEVELOPMENT

- experiences that foster independence and trust;
- age-appropriate expectations of children;
- adults interacting in supportive ways;
- experiences that help children develop social skills, competence, respect for others, and positive attitudes towards learning.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	**Setting 1:**	**Setting 2:**
- self-portraits and family pictures; - books, stories, puppets, and other dramatic play experiences; - interactive games and activities; - familiar routines and transitions; - clear, consistent age-appropriate rules developed with child input; - children accessing materials independently; - adults' timely response to children's cries and other cues; - adults encouraging and modeling problem-solving, behaviors, and language; - adults reinforcing age-appropriate self-control behaviors; - singing or talking during routines and transitions.		

ISSUES, QUESTIONS, AND FOLLOW-UP:

5. FACILITATING CHILDREN'S PHYSICAL DEVELOPMENT

- experiences that develop sensory and motor skills;
- experiences that develop fine and gross motor skills;
- children using and coordinating small muscles, including eyes, hands, and eye-hand coordination;
- sufficient safe indoor and outdoor space with age-appropriate equipment and materials.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	Setting 1:	Setting 2:
- tools such as blocks, beads, scissors, stapler, and writing or drawing tools, pencils and brushes, as appropriate;		
- opportunities and sufficient space for children to crawl, sit, walk, run, jump, and climb;		
- age- and ability-appropriate equipment and materials;		
- children using motor skills in daily routines such as pouring juice or milk, serving themselves, buttoning, and zipping;		
- children manipulating materials such as sand, water, and clay.		

ISSUES, QUESTIONS, AND FOLLOW-UP:

6. PREVENTION AND EARLY INTERVENTION INTEGRATING HEALTH, NUTRITION, MENTAL HEALTH, SAFETY, AND WELLNESS

• health, nutrition, and mental health integrated into routines and children's learning experiences.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	*Setting 1:*	*Setting 2:*
- toothbrushing and handwashing; - children using tissues and throwing them in the wastebasket after use; - sufficient time for meals; - adults, toddlers, and preschool children sharing family-style meals and pleasant conversations; - infants held while being fed; - children involved in food experiences; - topical books, songs, games, and fingerplays; - children role playing; - adults and children talking about visits to the dentist and doctor; - experiences representative of children's cultures.		

ISSUES, QUESTIONS, AND FOLLOW-UP:

7. INDIVIDUALIZING AND DISABILITIES SERVICES

- respect for the culture, language, ethnicity, family, and ability of each child;
- facilities that ensure children's safety, comfort, and participation;
- environment and curriculum that reflect the IFSP or IEP;
- adults observing and assessing children's behavior and progress.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:	Setting 1:	Setting 2:
- books, music, posters, and games in different languages and representing different cultures; - dolls, posters, pictures, and books that represent children with disabilities; - special furniture, equipment, and materials, if needed, to accommodate a child with disabilities; - activities adapted to include children with disabilities; - experiences required in the IFSP or IEP; - adults working with individual children and with small groups of children; - self-stick notes, notebooks, folders, cameras, or other procedures used to record observations.		

Classroom, Family Child Care, or Socialization Experience Observation Instrument

Home Visit Observation Instrument

SETTING 1

Setting:_____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

SETTING 2

Setting:_____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

Instructions for Home Visit Observations

This observation instrument is designed to help Service Reviewers observe key early childhood concepts during a home visit observation in a focus child's home when the focus child is enrolled in a home-based option. Each concept highlights the Performance Standards and other regulations relevant to the concept. The work of home visitors is very different from the work of classroom teachers. Home visitors work primarily with and through parents to support their child's growth. Therefore, the observation asks you to focus on how home visitors support parents in working with their child, and on the partnership between parents and the home visitor.

The form provides space to write observations for two settings. Use the spaces labeled "Setting One" and "Setting Two" to take notes about what you see and hear in relation to each concept for your focus child. For each setting take specific notes about what you see and hear in order to answer the following questions:

- What are the children doing, saying, and using?

- What is the parent doing, saying, and using?

- What is the home visitor doing, saying, and using?

Remember that children in home-based options are exposed to the program's curriculum both through home visits and group socialization experiences. If you were to observe children in both environments, you would see many experiences that support school readiness. However, for the limited time you will be on a home visit you may see only a few specific activities carried out by the home visitor and parent. Among those you may see are the following:

- art, music, rhyming songs, and movement;

- learning activities and games that promote knowledge of letters and sounds;

- adults reading and discussing stories;

- adults and children asking questions and engaged in extended conversations;

- children's use of tools such as beads, scissors, paint brushes, and a variety of writing tools;

- materials, conversations, and activities that support language use in the home language and English as a second language;

- puzzles, games, blocks, and other manipulatives that range in complexity;

- materials and experiences to develop counting, sequencing, and one-to-one correspondence;

- opportunities for the children to count, classify, sequence, sort, and match; and

- children using recipes for making snacks and involved in food experiences.

Use these and other similar activities to guide your observations.

Since you will not be able to observe all of the concepts listed, you will find it helpful to interview the home visitor as well. Before you begin your conversation, ask the home visitor to show you the following:

- a copy of the curriculum specific to infants, toddlers, or preschoolers;

- examples of the tools used in the assessment system;

- the focus child's file (may include the developmental screening, assessment data, and individualization plans); and

- planning documents.

INTERVIEW QUESTIONS	NOTES

We'd like to talk to you about your understanding of the curriculum, how you learn about children's progress, and how you plan for the children.

- Tell us about the curriculum you are using. How do you connect what you learned about *(focus child)* to what you are teaching him/her?

- How do you integrate issues of health, nutrition, and mental health into the curriculum? How do you prepare children for transitions? Can you provide an example?

- What developmental screening tool do you use? Are you involved in the process of conducting the developmental screening? If you're not, how do you get the results? How does the program use the information from *(focus child's)* screening?

- When screening results in a child having an IEP or IFSP, how do you use that plan in your work with that child? Can you give us an example of how you do that?

- Describe your process for the ongoing assessment of children. How often do you assess children?

- How have you been using the results from the ongoing assessment? How do you use the results to help you in your planning? How do you use the information from *focus child's)* assessments to work with him/her individually? Can you show us an example of how you do that?

- How do you communicate with *(focus child's)* parents about their child's progress? How are *(focus child's)* parents involved in the planning, individualizing, and implementation of the curriculum?

- If the focus child is a child with disabilities, ask: How are *(focus child's)* parents involved in the planning for their child's IEP?

- For 3- to 5-year-old classrooms ask: How does your curriculum respond to the Head Start Outcomes Framework?

REVIEWER	COMMENTS
Child development and/or disabilities services reviewers should review the written curriculum for the following: • goals for children's development and learning; • experiences through which children will achieve these goals; • what staff and parents do to help children achieve these goals; • the materials needed to support the implementation of the curriculum; • consistency with the *Head Start Program Performance Standards* and other regulations; • a base of sound child development principles about how children grow and learn; and • for preschool programs, inclusion of the eight domains of development and learning and the required domain elements and indicators (e.g., associates sounds with written words, recognizes a word as a unit of print, and phonological awareness). **Questions:**	

1. HOME VISIT INTERACTIONS AND STRATEGIES

How does the home visitor:

- demonstrate a friendly, cooperative relationship with the family?
- encourage parents to take leadership of the home visit?
- communicate in the family's preferred language?
- use the home as a learning environment and as a resource for curriculum experiences?
- understand the link between home visits and socialization experiences?

Observe: What are the adults doing? What is the child doing?

- *(For preschool children)* help parents plan experiences that foster their child's development and learning in the eight domains?
- help parents improve their parenting skills?
- plan home visits with parents to incorporate all services of the Head Start program?
- evaluate the home visit with parents?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

2. FACILITATING CHILDREN'S LANGUAGE AND LITERACY DEVELOPMENT

How does the home visitor help parents

- understand how children learn?
- provide age-appropriate experiences that support child language and literacy learning and development?
- provide school-readiness experiences through home visits and group socializations that reflect the program's curriculum?
- value creative expression?
- foster communication, including communication in the home language?
- develop auditory and visual discrimination?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

3. FACILITATING CHILDREN'S MATH AND SCIENCE DEVELOPMENT

How does the home visitor help parents provide:

- experiences that develop skills in mathematics?
- experiences that develop skills in science?
- experiences that develop auditory and visual discrimination?
- opportunities for children to discover how numerical concepts relate to other concepts?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

4. FACILITATING CHILDREN'S SOCIAL AND EMOTIONAL DEVELOPMENT

How do the home visits help parents:
- provide experiences that foster independence?
- develop age-appropriate expectations of children?
- interact in supportive ways?
- help children develop social skills, respect for others, and friendships?
- help children feel successful, competent, and positive toward learning?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

5. FACILITATING CHILDREN'S PHYSICAL DEVELOPMENT

How does the home visitor help parents:
- provide experiences that develop sensory and motor skills?
- provide experiences that develop fine and gross motor skills?
- assist children in using and coordinating small muscles including eyes, hands, and eye-hand coordination?
- provide sufficient safe age-appropriate equipment and materials?
- supervise their child during physical activities?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

6. CURRICULUM: PREVENTION AND EARLY INTERVENTION INTEGRATING HEALTH, NUTRITION, MENTAL HEALTH, SAFETY, AND WELLNESS

How does the home visitor help parents:

- ensure a safe environment?
- promote health, nutrition, and wellness?
- understand and use health and hygiene practices?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

7. CURRICULUM: INDIVIDUALIZING AND DISABILITIES SERVICES

How do the home visitor and the parent:

- plan and implement experiences that match the child's current developmental level?
- understand ways to adapt or change activities for the child?
- identify, select, and use toys, books, and other materials that match the child's interests and abilities?
- incorporate IFSP or IEP goals into daily activities?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

8. FAMILY PARTNERSHIPS

How does the home visitor
- support positive relationships?
- respect the home language and culture?
- encourage parents to get involved in other areas of the Head Start program?
- support parents in progress towards their goals?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

Income Eligibility Process and Data Collection Form Instructions

File Selection Process:

For FY 2005, the Head Start Bureau is requiring each PRISM review team to review a sample of (see Sample Size Look-Up Table) randomly selected children's files to obtain information regarding the program's compliance with income eligibility program requirements. **These files cannot be those belonging to focus children who are already involved in the PRISM process.** With the exception of this restriction relating to focus children, the exact process for selecting the files is to be decided at the team leader's discretion.

Sample Size Look-Up Table:

This table should be used to determine the number of files that will be reviewed. The first column represents the program's actual enrollment, and the second column is the corresponding sample size for each of those actual enrollment (or range of actual enrollment) numbers. If the program's actual enrollment is less than 20, please review all of the children's files (e.g., review all 17 files for the 17 enrolled children). For enrollment numbers of 20 or greater, refer to the table to determine the correct sample size.

Actual Enrollment	Sample Size
0	0
1	1
2	2
3	3
4	4
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
15	15
16	16
17	17
18	18
19	19
20-37	20
38-77	25
78-597	30
598 or more	35

Data Collection Form Completion:

1. Please enter the program name, dates of the review, grant number, the program's actual enrollment figure, the number of focus children already selected for the PRISM review, and your name in the spaces provided.

2. For each child, determine if the program identified the child as income eligible or as part of the program's enrollment from "over-income" families.

    a. For all children identified by the program as income eligible (i.e., from a household that meets the low-income guidelines), enter a Y in column B and proceed to step 3 (column C).

    b. If the child was enrolled as an "over-income" child, note that on the attached form by entering an N in column B. If you enter an N in column B, your work for that specific child's file has been completed and you should proceed to the next file.

3. Determine if there is a signed statement by a Head Start program employee stating that the child was determined to be income eligible to participate in the program.

    a. If the file contains a signed determination statement, enter a Y in column C and proceed to step 4 (column D).

    b. If the file does not contain a signed determination statement, enter an N in column C. If you enter an N in column C, your work for that specific child's file has been completed and you should proceed to the next file.

4. Determine if there is additional documentation that was used in verifying and determining the child's income eligibility.

    a. If the file contains additional documentation used to verify the child's income eligibility status, enter a Y in column D and proceed to step 5 (column E).

    b. If the file does not contain additional documentation used to verify the child's income eligibility status, enter an N in column D. If you enter an N in column D, your work for that specific child's file has been completed and you should proceed to the next file.

5. Review the documentation used to determine eligibility and make your own determination about the child's eligibility.

    a. If you concur with the program that the child is income eligible (i.e., from a household that meets the low-income guidelines), enter a Y in column E.

    b. If you conclude that the child is not income eligible (i.e., "over-income"), enter an N in column E.

You should feel free to discuss any issues in this area with the Head Start program, where appropriate.

Example of Correct Data Collection Form Completion:

A	B	C	D	E
	Program has enrolled the child as an income eligible (from a low-income household) child	Reviewer finds a signed statement in folder identifying that eligibility has been verified	Reviewer finds in folder documentation used by the program for determining eligibility	Reviewer supports grantee's determination of income eligibility
File Number	(Y or N)	(Y or N)	(Y or N)	(Y or N)
1	Y	N		
2	N			
3	Y	Y	Y	Y

The reviewer correctly stopped working on File Number 1 after entering N in column C. Also, the reviewer correctly filled out the form by leaving the rest of the columns blank after writing N in column B for File Number 2. For File Number 3, the reviewer filled in all four columns because every column had a Y in them.

This example demonstrates the correct completion of the form because once an N is entered into a column, the reviewer should stop work for that file and move on to begin work on the next file.

Example of <u>Incorrect</u> Data Collection Form Completion:

A	B	C	D	E
	Program has enrolled the child as an income eligible (from a low-income household) child	Reviewer finds a signed statement in folder identifying that eligibility has been verified	Reviewer finds in folder documentation used by the program for determining eligibility	Reviewer supports grantee's determination of income eligibility
File Number	(Y or N)	(Y or N)	(Y or N)	(Y or N)
1	Y	Y	N	Y

The reviewer should have stopped work on File Number 1 after entering N in column D. Since there is no additional documentation verifying income eligibility, it would be impossible for the reviewer to make a determination of support for the grantee's initial determination of income eligibility. Therefore, column E should have been left blank and the reviewer would begin work on File Number 2.

Completed Forms

Please deliver completed forms to the team leader as part of the requirement to submit all review-related documentation at the end of the On-Site Activities phase of the review.

Income Eligibility Data Collection Form

Program Name: _____   **Review Date:** _____

Reviewer Name: _____   **Grant Number:** _____

Actual Enrollment: _____   **Number of PRISM Focus Children:** _____

A	B	C	D	E
File Number	**Program has enrolled the child as an income eligible (from a low-income household) child** **(Y or N)**	**Reviewer finds a signed statement in folder identifying that eligibility has been verified** **(Y or N)**	**Reviewer finds in folder documentation used by the program for determining eligibility** **(Y or N)**	**Reviewer supports grantee's determination of income eligibility** **(Y or N)**
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				

A	B	C	D	E
File Number	**Program has enrolled the child as an income eligible (from a low-income household) child** **(Y or N)**	**Reviewer finds a signed statement in folder identifying that eligibility has been verified** **(Y or N)**	**Reviewer finds in folder documentation used by the program for deter-mining eligibility** **(Y or N)**	**Reviewer supports grantee's determination of income eligibility** **(Y or N)**
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
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Forms
(Appendix II)

GRANTEE'S ADVANCE ACTIVITIES CHECKLIST

This checklist summarizes for you the activities that need to be completed during the Advance Activities phase of the review. Additional details regarding each of the listed activities can be found in the *PRISM Guide.*

Record Team Leader Name and Review Dates

○ Name of Team Leader: _____

○ Dates of Review: _____

Provide Background Information

○ Make available to the team leader materials as requested on the **PRISM Records Request Form**. The form specifies:

   – Documents to be delivered to the team leader;

   – Documents to be delivered to the hotel for advance review by the Fiscal Reviewer; and

   – Documents that you must make available to the review team while on-site.

○ No later than 30 days in advance of the Fiscal Reviewer's anticipated arrival date, provide to the team leader written certification that relevant fiscal documents will be delivered to the review team's hotel no later than the Saturday afternoon before the start of the On-Site Activities phase of the review.

Prepare for the Entrance Meeting

○ Work with the team leader to schedule and identify the location of the **Entrance Meeting**, which is the first event of the On-Site Activities phase of the review. Invite any staff you believe should attend, as well as your governing body chairperson, Executive Director, and Policy Council chairperson. Estimate no more than 1 hour for the meeting.

○ You may **develop a brief presentation** for delivery at the Entrance Meeting that provides an overview of your agency's history, structure, and program design, as well as a demographic description of your community and families.

Prepare for Optional Group Interviews (conducted at the discretion of the team leader)

The following interviews are conducted at the sole discretion of the team leader. For each interview requested by the team leader, make respective preparations as described on the following page.

❍ Work with the team leader to schedule, identify the location of, and identify participants for the **Management Team Interview.** Possible participants include you, a representative of the governing body, the Policy Council chair, the fiscal officer, and the individuals who manage early childhood development and health services and family and community partnerships. Ensure that the group is small enough to facilitate the involvement of all participants (i.e., generally no larger than 12 staff). Discuss the format and content of the interview with the team leader. Estimate 2 hours for the session.

For grantees with delegates: Work with the team leader and delegate directors to schedule each **Delegate Agency Management Team Interview** to occur subsequent to the Delegate Agency Entrance Meeting. Estimate 2 hours for each session.

For grantees with delegates: Work with the team leader and delegate directors to schedule the **Delegate Directors Interview** to occur after the Grantee Management Team Interview. Discuss with the team leader the group of delegate agency directors to be included, and ensure they represent a range of delegate agencies that will not be included in other aspects of the review. Discuss format and content of the interview with the team leader. Estimate 2 hours for the session.

❍ Work with the team leader to schedule and identify the location of the **Content Area Experts Interview.** Work with the team leader to identify appropriate participants (e.g., individuals who manage family and community partnerships, early childhood development and health services, disabilities services, nutrition services, and/or mental health services). Make sure that the group is small enough to facilitate the involvement of all participants (i.e., generally no larger than 12 staff). Some or all of the participants may also attend the Management Team Interview. Discuss the format and content of the interview. Estimate 1½ to 2 hours for the session.

For grantees with delegates: Work with the team leader so that the team leader may determine the need for **multiple Content Area Experts Interviews**. In general, if your agency has content area experts who oversee all delegate agency content staff, only one Content Area Experts Interview is needed. However, if a delegate agency selected for review has its own content area experts, the team leader may wish to schedule a Content Area Experts Interview specific to the delegate agency. Estimate 1½ to 2 hours for the sessions.

❍ Work with the team leader to schedule and identify the location(s) of the **Staff Group Interview(s)**. The team leader will randomly select from your staff roster the specific individuals who should attend. Typically, the team leader will ensure that each group will involve no more than approximately 10–12 staff members and will include a variety of direct services staff (e.g., classroom staff, home visitors, family child care providers, family service workers, cooks, bus drivers). Estimate no more than 2 hours for the session.

Assist in the Selection of Delegate Agencies, Centers, and Classrooms to Be Visited

Note: While the team leader may select the individual sites to be visited without your direct assistance, your help is still needed in the facilitation of that process.

❍ If you are a grantee with delegate agencies, provide the team leader with an updated list of names of all delegate agencies. Note the following information next to each agency: if it is a new Head Start center, has a new director, has had significant staff turnover, involves a child care partnership, or if it is one you would especially like the team to visit.

❍ Prepare an updated list of all centers and geographic areas. (If you are a grantee with delegate agencies, the team leader will tell you which delegate agencies will be included in this review. Make sure that the list is organized by delegate agency.) Note the following information next to each center or geographic area: if it is a new Head Start center, if it involves a child care partnership, if it has an Early Head Start program, how far it is from the grantee's administrative office, and its program options.

❍ Prepare an updated list, for each center or geographic area, of lead teachers in each classroom (a.m. and p.m., if there are double sessions), family child care providers in the area, and home visitors in the area. Make sure child care partnership centers are included.

Selection of Focus Children and Families

Note: While the team leader may select the individual focus children and families without your direct assistance, he or she needs your help in the facilitation of that process.

❍ Prepare class rosters and home visitor caseloads. Identify children with disabilities and make special note of children with more significant disabilities. Identify home-based families who will have regularly scheduled home visits on days when it would be convenient for reviewers to accompany home visitors.

❍ Provide the team leader with a list of potential home visits to be made during the review, and ask that staff check with families to be sure that it is acceptable for reviewers to come to their homes. Make substitutions, when necessary, and oversee logistics ensuring that reviewers accompany home visitors to and from these homes.

❍ Provide the team leader with information about child care partners selected for a visit. Verify hours of operation.

Prepare for Interviews

❍ Work with the team leader to schedule and identify the location(s) of the **Family Group Interview**. Once you know when the focus families will be available for an interview, talk to the team leader to arrange a date and time for the interview. The interview is generally held after reviewers have had the opportunity to observe their focus children and look at

children and families' files. Also, take care of logistical arrangements such as transportation, child care, and translation, if needed. Estimate no more than 2 hours for the session.

❍ Work with the team leader to arrange for the review team to observe a **Policy Council or Policy Committee meeting**. This should be a meeting during which regular agenda topics are discussed. Make sure the Policy Council or Policy Committee plans to stay for about half an hour after the meeting to talk with the reviewers. Estimate no more than 30 minutes for the session.

❍ Work with the team leader to arrange for the review team to speak with as many members of the **governing body** as seems feasible. If possible, schedule a meeting between reviewers and some members of the governing body. Otherwise, ask representative members of the governing body when it would be convenient for a reviewer to call them or visit them for an individual interview. Estimate no more than 30 minutes for the session.

❍ Work with the team leader to schedule and identify the location(s) of the **Child Care Partner Interview(s)**. If a group interview is not possible, the appropriate reviewers may be able to speak to one or several of the partners either by phone or in person when they visit their child care program to observe a focus child. If you have only a small number of child care partners, consider adding them to the Community Partners group. Estimate 30 minutes to 1 hour for the session.

❍ Work with the team leader to arrange for reviewers to speak with key **community partners,** including a representative of the Local Education Agency (LEA) or Part C[1] agency. Ask participants of the Community Partnerships Interview to complete the Community Partnerships Information Form (see Appendix II: Forms) and provide the team leader with these completed forms. Conversations with community partners may occur through individual meetings, individual phone calls, or a group interview. Estimate about 30 minutes to 1 hour for the interview(s).

❍ Work with the team leader to arrange for at least one reviewer to accompany children on a **bus ride**.

Grantee Briefings and Summary Meeting

❍ Discuss with the team leader expectations regarding the frequency, timing, and circumstances of daily briefings.

❍ Work with the team leader to schedule and identify the location of the Summary Meeting.

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[1] Individuals with Disabilities Education Act (IDEA)

TEAM LEADER'S ADVANCE ACTIVITIES CHECKLIST

This checklist summarizes for you the activities that need to be completed during the Advance Activities phase of the review. Note that ❑'s placed before an item mean that grantee staff need not be involved; ❍'s *might* require input from the grantee's Head Start director.

All forms referred to in this checklist are located in the Forms appendix of the *PRISM Guide.*

Record Identifying Information

Grantee Name: _____

Grant Number: _____

Name of Grantee Director: _____

Set Dates for Review

❍   Dates: _____

Contact the Grantee

❍ Contact the grantee early in the Advance Activities phase. During the initial contact, introduce yourself and advise the grantee of the review dates. (During this or subsequent calls, you will need to request background and other information and make logistical preparations. These items are addressed below.)

❍ Send letter to grantee confirming dates of review.

Request Background and Advance Review Documents

❍ Complete the **PRISM Records Request Form** and deliver to the grantee. Complete each section of the PRISM Records Request Form to specify:

   –   Documents to be delivered to you (i.e., documents to assist you in planning for the review and documents you will distribute for advance review by all review team members);

   –   Documents to be delivered to the hotel for advance review by the Fiscal Reviewer (work with the Fiscal Reviewer in identifying this information); and

   –   Documents that the grantee must make available to you and your team while on-site.

○ Communicate to the grantee director that he or she must deliver to you, 30 days in advance of the Fiscal Reviewer's anticipated arrival date, written certification that relevant fiscal documents will be delivered to the review team's hotel no later than the Saturday afternoon before the start of the On-Site Activities phase of the review.

❑ Contact the assigned Program Specialist to obtain copies of documents available from the Regional Office (see the **PRISM Records Request Form** for reference).

Select Review Team

❑ Complete **Review Team Request Form** online and send to the monitoring contractor at least 100 days prior to the review.

❑ Once the members of the review team have been identified by the Regional Review Coordinator and any change requests have been resolved, transmit the names of review team members to the grantee for review.

❑ Once the composition of the review team has been finalized, complete the **Team Assignment Worksheet** to assign Core Questions to each reviewer.

Arrange for Distribution of Advance Review Information

❑ Upon receipt of requested information from the grantee and Program Specialist, distribute to all reviewers copies of those materials that each must review in advance of the Review Team Planning Meeting.

○ Work with the grantee to ensure timely delivery to the hotel of specified fiscal documents for advance review by the fiscal reviewer(s).

Schedule the Review Team Planning Meeting

❑ Schedule the **Review Team Planning Meeting** to occur (on-site or at the hotel) prior to the Entrance Meeting at the grantee's site.

Schedule the Entrance Meeting Interview

○ Schedule the **Entrance Meeting** as the first grantee event of the review. The director may invite any staff he or she believes should attend. Estimate no more than 1 hour for the meeting.

For grantees with delegates: Determine whether separate entrance meetings are desirable, and if so, to schedule such meetings. The grantee's Entrance Meeting may occur in the month preceding the full review (if a sufficient number of review team members can attend).

Schedule Optional Group Interviews (as desired)

❍ Schedule the **Management Team Interview** to follow the grantee's Entrance Meeting. Work with the director to identify appropriate personnel to participate (e.g., agency director, representative of the governing body, Head Start director, Policy Council chair, fiscal officer, and the individuals who manage (a) early childhood development and health services and (b) family and community partnerships), and to ensure that the group is small enough to facilitate the involvement of all participants (i.e., generally no larger than 12 staff). Discuss the format and content of the interview with the director. Estimate 2 hours for the session.

For grantees with delegate agencies: Schedule each **Delegate Agency Management Team Interview** to occur subsequent to the Delegate Agency Entrance Meeting. In general, these interviews are scheduled through the grantee director, who negotiates with the delegate director. Estimate 2 hours for each session.

For grantees with delegate agencies: Schedule the **Delegate Directors Interview** to occur after the Grantee Management Team Interview. Discuss with the grantee director the group of delegate agency directors to be included. Ensure that they represent a range of delegate agencies that will not be included in other aspects of the review. Discuss the format and content of the interview with the grantee director. Estimate 2 hours for the session.

❍ Schedule the grantee's **Content Area Experts Interview** to follow its Management Team Interview. Work with the grantee director to identify appropriate participants (e.g., individuals who manage family and community partnerships, early childhood development and health services, disabilities services, nutrition services, and/or mental health services). Make sure that the group is small enough to facilitate the involvement of all participants (i.e., generally no larger than 12 staff), and that the director understands that some or all of these people may also attend the Management Team Interview. Discuss the format and content of the interview with the director. Estimate 1½ to 2 hours for the session.

For grantees with delegate agencies: Decide if there will be **multiple Content Area Experts Interviews.** In general, if the grantee has content area experts who oversee all delegate agency content staff, only one Content Area Experts Interview is needed. However, if a delegate agency selected for review has its own content area experts, you should schedule a Content Area Experts Interview specific to the delegate agency. If the grantee does not have content area experts (i.e., all are hired by delegate agencies), schedule Content Area Experts Interviews for delegate agencies only. Estimate 1½ to 2 hours for the sessions.

❍ Determine the number and composition of **Staff Group Interviews** to be conducted. The number and composition of interviews should be sufficient to gather adequate information regarding relevant staff activities across sites in the agency.

Talk with the director to select the staff to attend each group interview. Ensure that each group will involve no more than approximately 10–12 staff members and will include a variety of direct services staff (e.g., classroom staff, home visitors, family child care providers, family service workers, cooks, bus drivers).

Schedule the Staff Group Interviews to occur as soon as possible after the Content Area Experts Interview. Note that, if necessary, a Staff Group Interview may occur at the same time as the Content Area Experts Interview. Estimate no more than 2 hours for each interview.

Select Delegate Agencies (skip if grantee has no delegate agencies)

❑ Complete Step 1 on the **Selection Process Form** to identify delegate agencies the review team will visit, ensuring an appropriate representation. Record choices on the **Selection Tree Form**.

Select Centers and Geographic Areas for Family Child Care or Home-Based Option

❑ Complete Step 2 on the **Selection Process Form** to select centers and geographic areas to visit. Record the names of the centers (including child care partners' centers) and areas on the **Selection Tree Form**.

Select Classrooms, Family Child Care Homes, and Home Visitors

❑ Complete Step 3 on the **Selection Process Form** to select classrooms and/or homes to visit and home visitors to accompany. Record the names of the lead teachers, home visitors, and family child care providers on the **Selection Tree Form**.

Select Focus Children and Families

❑ Complete Step 4 on the **Selection Process Form** to select focus children and their families.

Schedule the Family Group Interview

❍ Work with the grantee director to schedule the **Family Group Interview** at a time convenient for most parents to attend. Assign the facilitator and notetaker. All focus families should be invited to attend the interview. Reviewers should make every effort to talk to members of all focus families during the review, including those who are not able to attend the Family Group Interview, so that there is a broad representation of parents in the review process. Alternative ways to contact parents who are not able to join the

interview include telephone calls in the evening, speaking with parents when they drop off or pick up their children, or going on a bus ride. Estimate no more than 2 hours for the session.

Schedule the Policy Council/Committee Meeting

❍ Arrange with the director, if possible, to observe a meeting of the policy group. Each meeting should include discussion of regular agenda topics. Assign the reviewers who will both attend the meeting and interview the policy group members at the end of the meeting. Estimate about 30 minutes for the interview.

For grantees with delegate agencies: Observe the grantee's Policy Council and Policy Committee meetings of each of the delegates selected for review.

Schedule the Governing Body Interview(s)

❍ Arrange with the director to speak with as many members of the governing body as seems feasible, either as a group or individually (in person or by phone). Work with the grantee director to schedule a group interview or to identify times convenient for reviewers to call governing body members. Estimate about 30 minutes for the interview(s).

For grantees with delegate agencies: Speak with the grantee's governing body and the governing body of each delegate selected for review.

Schedule the Child Care Partners Interview(s)

❍ Work with the director to make arrangements for interviewing child care partner staff. These interviews may be conducted as individual or small group interviews, and may take place either at the child care partner's site or at the Head Start site. If desired, these partners may join other community partners in their respective interviews. Estimate about 30 minutes to 1 hour for the interview(s).

Schedule the Community Partners Interview(s)

❍ Work with the director to identify and speak with individuals from key community partner agencies, including a representative of the Local Education Agency (LEA), or Part C[1] agency. Communicate to the grantee director that he or she should send the Community Partnerships Information Form (see Appendix II: Forms) to all participants of this interview, and then send the completed forms to you. If desired, request that the grantee director set up individual meetings or group meetings, or find out what times during the week would be convenient for a call or visit. Estimate about 30 minutes to 1 hour for the interview(s).

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[1] Individuals with Disabilities Education Act (IDEA)

Schedule the Shadow Bus Ride (if transportation services are offered to children)

❍ Work with the director to arrange for a reviewer to accompany children on a bus ride. Record on the **Team Assignment Worksheet** the identity of the assigned reviewer and details regarding bus ride arrangements.

Discuss Grantee Briefings

❍ During initial discussions with the grantee, convey to the grantee director the importance of ongoing communication and discuss your expectations regarding probable frequency, timing, and circumstances of briefings during the on-site phase of the review.

Schedule the Summary Meeting

❍ Work with the grantee director to schedule and identify participants in the Summary Meeting.

For grantees with delegate agencies: Work with the grantee director to determine whether separate Summary Meetings are desirable, and if so, to identify participants and schedule such meetings.

PRISM RECORDS REQUEST

Review team members need to have access to the following materials during the monitoring review. Some of these items can be sent in advance while others should be made available to reviewers during the On-Site Activities phase of the review. Please complete this request prior to the On-Site Activities phase. Specify those documents you wish the grantee to provide in advance and those documents to be made available for review during the On-Site Activities phase. For those documents to be reviewed by the team while on-site, have the grantee specify on this form the location of the files and grantee staff responsible for providing access to the information.

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
RECOMMENDED FOR ADVANCE REVIEW (REGIONAL OFFICE RECORDS)		
Background Information • Grantee "working" file[1] • Final Head Start Review Report and cover letter from most recent triennial and any follow-up reviews • Quality Improvement Plans (QIPs), if applicable • Program Information Reports (PIRs) from the past 2 years	N/A	Program Specialist
RECOMMENDED FOR ADVANCE REVIEW (GRANTEE RECORDS)		
ADVANCE REVIEW - FISCAL REVIEWERS		
Funding/Budget and Fiscal Documentation • Most recent audit report • Management letter (that accompanies the audit report) • Current and prior year Financial Assistance Award (FAA), including one-time funding for major purchases (e.g., buses, renovations, or facilities purchase), and recent expansion information	To be delivered to the review team's hotel no later than the Saturday afternoon before the start of the On-Site Activities phase of the review	Grantee Director

[1] Content of this file includes correspondence between the Regional Office and the grantee and relevant community and Head Start program information.

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
• Current financial statements, including the balance sheet for the agency and the financial statements from the Head Start program • Organizational chart or list of staff and function of each staff person, including any vacancies • Policies and Procedures manual(s) covering fiscal operations • Indirect cost agreement/cost allocation plan • Most recent financial reports as delivered to the governing bodies • Lease agreements • Most recent SF-269 (Financial Status Report) with supporting documentation • PMS-272 (Federal Cash Transaction Report) with supporting documentation		
ADVANCE REVIEW - ALL REVIEWERS		
Program History • Head Start and/or Early Head Start grant applications from the past 2 years • Notice of grant award		
Program Plans • Community Assessment • Long-range program goals and short-term program and financial objectives • Written plan(s) for program services • Child Outcomes plan • Grantee Profile[2]		
Program Administration • Health Services Advisory Committee minutes • Grievance procedure for parent or community complaints		

[2]   The Grantee Profile is available on the team leader Web site at www.headstartreviews.com

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
• Most recent self-assessment (including description of procedures, results, and actions in response to results) • Recruitment/enrollment information (including policies/procedures, attendance records, and enrollment/waiting list information) • Grantee/delegate contracts, if applicable • Interagency and child care partnership agreements		
Policy Council Information • Bylaws • Membership list • Minutes for the last 12 months • Impasse procedure		
Governing Body Information • Bylaws • Membership list (including roles and responsibilities of members) • Minutes for the last 12 months • Information on policies/procedures related to governance not included elsewhere		
Personnel-Related Documents • Organizational chart or list of staff and function of each staff person, including any vacancies • Job descriptions		
Training-Related Documents • Staff development and training approach • Training and technical assistance (T/TA) plan		

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
RECOMMENDED FOR ON-SITE REVIEW		
General Program Activity Information • Menus • Daily classroom schedule • Class rosters • General information supplied to parents • Information on use of volunteers • Schedules of parent meetings and topics		
Child Records • Ongoing assessment of progress • Screening and health care records • Emergency contact information • Individualized Education Plan (IEP) and/or Individualized Family Service Plan (IFSP), if applicable • Food and/or health allergies		
Family Records • Conversation or anecdotal notes • Description of family goals and progress • Documentation of home visits and parent/teacher conferences • Documentation of parent involvement • Enrollment/income eligibility forms		
Personnel-Related Documents • Personnel policies (including policies and procedures pertaining to confidentiality) • Salary schedule • Staff personnel files including staff health records • Staff performance evaluations		
Training-Related Documents • Records of all training provided		

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
Health- and Safety-Related Policies and Procedures • Medication administration • Short-term exclusion • Emergency procedures • Child abuse/neglect reporting procedures • Equipment maintenance logs • Results from environmental tests and/or safety inspections • Hazardous material (e.g., blood, human waste) disposal policies		
Licenses • Child care • Sanitation • Fire/safety • Food handlers • Other (as required under applicable State or local regulations)		
Fiscal Records • Detailed general ledger or accounts payable (AP) disbursements journal • Monthly trial balances • Bank reconciliation • Administrative costs documentation • Written accounting procedures • Program budget planning documents (e.g., forms, memorandums, work papers) • Chart of accounts • Property inventory and files for recent major purchases • Procurement policies • Payroll journal • Insurance policies (e.g., liability, vehicles, child accident) • Non-Federal share documentation		

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
• Department of Agriculture (USDA) accounting records and source documents (e.g., meal counts, etc.) • Vendor contracts • Grantee charter document		
Transportation Records • Bus routes • Bus logs • Driver licenses • Accident records • Maintenance logs		
Other • Maintenance logs for facility (if owned by grantee)		

COMMUNITY PARTNERSHIPS INFORMATION FORM

Name: _____   Date: _____

Title: _____   Time: _____

Agency: _____

Please describe your agency's role in the community. What is your role in the agency?
Do you have an interagency agreement with the HS/EHS program? (circle one)   Yes   No
Tell us about the partnership you have with this Head Start/Early Head Start program.
How do you communicate and what type of information do you share?
What are the strengths of your partnership?
What do you see as the greatest challenges?

TEAM ASSIGNMENT WORKSHEET

Grantee: _____   Dates of Review: _____

Team Leader: _____

Activity	Who Leads	Who is Also Responsible
Core Questions		
1. Program Governance		
2. Planning		
3. Communication		
4. Record-Keeping and Reporting		
5. Ongoing Monitoring		
6. Self-Assessment		
7. Human Resources		
8. Fiscal Management		
9. Prevention and Early Intervention		
10. Individualization		
11. Disabilities Services		
12. Curriculum and Assessment		
13. Family Partnership Building		
14. Parent Involvement		
15. Community Partnerships		
16. ERSEA		
17. Facilities, Materials, Equipment, and Transportation		
18. Child Outcomes		

Activity	Who	When	Where
Review Team Planning Meeting			
Entrance Meeting			

TEAM ASSIGNMENT WORKSHEET (CONTINUED)

Activity	Who	When	Where
Management Team Interview *(optional)* (Facilitated by team leader) Notetaker:			
Content Area Experts Interview *(optional)* Facilitator: Notetaker:			
Staff Group Interviews *(optional)* #1 Facilitator: Notetaker: Attending: #2 Facilitator: Notetaker: Attending: #3 Facilitator: Notetaker: #4 Facilitator: Notetaker:			
Family Group Interview Facilitator: Notetaker:			
Government Body Interview(s)			
Policy Group Meeting			
Community Partnership Contacts			
Child Care Partnership Contacts			

TEAM ASSIGNMENT WORKSHEET (CONTINUED)

Activity	Who	When	Where
Health and Safety Checklist Setting #1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11 #12			
Transportation Services Checklist			
Income Eligibility Data Collection Form			
Grantee Briefings			
Team Meetings			
Summary Meeting			
Other			

Child's Name	Age	Program Option	Disability	Language	Parent Name	Parent Attending Focus Group	Siblings Enrolled in HS/EHS	Reviewer	Estimated Time of Observation
			Grantee					**Review Team**	
Center & Classroom:									
Center & Classroom:									

| | | Grantee | | | | | | Review Team | |
Child's Name	Age	Program Option	Disability	Language	Parent Name	Parent Attending Focus Group	Siblings Enrolled in HS/EHS	Reviewer	Estimated Time of Observation
Center & Classroom: Oak Ridge, Classroom A									
Joe Smith	4	AM only	No	Spanish	George Smith	Yes, Oak Ridge 3/22 at 10AM	Mary Smith, 2, home-based EHS	Jane Doe	Wed. 9 AM
Lisa Name	3	AM only	Yes, Hearing Impaired	English	Mike Name	No	No	John Doe	Tues. 10 AM
Center & Classroom: Wonder St Center, Classroom 201									
One Child	2	Full Day	No	English	Jen Child	No, working but can be reached by phone.	Older Child, 4, Classroom 204	Jeff Doe	Tues. 3 PM

THE SELECTION PROCESS

In the sections that follow, instructions are given for selection at four different levels: (1) delegate agencies; (2) centers or geographic areas; (3) classrooms, family child care homes, and home visitors; and (4) focus children and their families. Note that the second level, "centers or geographic areas," is meant to characterize locations of center-based classrooms, groupings of home-based services, or groupings of family child care homes. These four levels of selection will not be needed when reviewing all grantees. If the grantee has no delegate agencies, skip Step 1. If all centers or geographic areas will be visited, skip Step 2.

The discussion provides a step-by-step methodology to use in preparing for a review, using the Selection Tree form on page 33 of this chapter.

Step 1: Select Delegate Agencies to Visit
(Skip this step if there are no delegate agencies.)

Several key guidelines are followed in the selection of delegate agencies to review when the grantee has delegate agencies:

- A comprehensive review entails assessing a grantee's overall operations, its level of oversight of and support to delegate agencies, and individual delegate agency performances.

- In order to determine the effectiveness of the grantee's systems, services, and partnerships, it is not necessary to visit all delegates. A subset, chosen carefully, holds the grantee accountable and ensures program quality.

- It is possible to select a subset of delegate agencies and complete a comprehensive and thorough PRISM review using good professional judgment. Simple random selection—giving every delegate, center, and child an equal chance of being included—is not as effective for Head Start reviews as a technique that gives more "weight" to some delegates over others.

- Planning for monitoring in each 3-year period is done by the responsible HHS official or designee, with the grantee providing information or assistance as requested. The responsible HHS official or designee makes the final decision on which delegate agencies to visit.

- In grantees with 1 to 5 delegate agencies, the review involves 1 or 2 delegate agencies and is completed in a single year. If the responsible HHS official or designee decides it is

possible to conduct an accurate review of the grantee through visiting only 1 delegate, then 1 is included in the review.

- In grantees with 5 to 20 delegate agencies, the review includes 2 to 5 delegates and is conducted in a single year.

- In grantees with 20 to 50 delegate agencies, the review includes 5 to 8 delegate agencies. The review may be conducted in a single year or over multiple years.

- In grantees with more than 50 delegate agencies, the review includes 8 to 24 delegate agencies. The review may be conducted in a single year or over multiple years.

- For grantees with delegate agencies, the group of delegates selected for review in a 3-year period includes:

    1. A mix of auspices, urbanicity (i.e., urban, suburban, rural), and population served (i.e., cultural and ethnic groups);

    2. A mix of agencies with large, medium, and small enrollments;

    3. A representation of program options and special services (e.g., child care partnerships, family child care);

    4. At least one delegate that offers Early Head Start (if any delegates do); and

    5. Agencies recommended for inclusion by the director because, for example, the grantee wishes to showcase services or is taking enforcement action.

- If a delegate is also a grantee in its own right and is scheduled for review as a grantee, consider including the delegate as a part of the review of the grantee with delegates and coordinating the two reviews.

- In selecting delegate agencies, team leaders may select the same or different delegates from those reviewed in the previous cycle. Agencies may be revisited, for example, if there are clear reasons why they must be included (e.g., many reports have come to responsible HHS officials or designees from parents, or the grantee reports an excellent new program of services).

- Once a delegate agency is selected for review, it receives a comprehensive review of all systems, services, and partnerships.

- The duration of the review of a grantee with 5 to 20 delegates is 1 week to 1 year. The duration for a grantee with more than 20 delegates ranges from 1 week to 3 years. For example, delegates may all be reviewed in the same week, in consecutive weeks, or in weeks separated across time.

- The length of a review for grantees with five or more delegate agencies may exceed the usual week to accommodate (1) the need to work with and to conduct desired interviews with staff at both the grantee and delegate levels and (2) the need to integrate the results of multiple teams. For example, if conducted, the Management Team Interview for grantee staff and the Management Team Interview for a group of delegate directors may occur in the week prior to the reviews of delegate agencies. The Summary Meeting may be held the week after the fieldwork, allowing more time for analysis of data from multiple locations.

Use the Selection Tree (Step 1) on page 33 of this chapter to help plan the review. If the review team will be working with multiple agencies, simply write the names of all agencies to be visited in the Selection Tree (Step 1) under the name of the grantee. Use multiple copies of the Selection Tree chart if the team will be visiting more than two delegate agencies. If the grantee agency offers services to children and is one of the agencies to be reviewed, its name should appear at the top of the Selection Tree and also on the line designating "delegate agencies."

Step 2: Select Centers or Geographic Areas to Visit
(Skip this step if all centers and geographic areas will be visited.)

The goal of this step is to choose the centers, family child care homes, and home-based areas that one or more members of the review team will visit. If there are too many centers to visit (or if they are too far apart), the team leader needs to collect information on certain characteristics of each center and select those that will be visited. Because of their effects on the quality of services, the following characteristics of centers should be considered in the selection:

- The center is relatively new to Head Start and has not yet been reviewed;

- The center is part of a child care partnership; and

- The grantee's Head Start director wants to showcase the center's excellence or has expressed concern about its performance.

A premise of the PRISM review is that reviewers will be thorough in investigating the

experience of at least one child and his/her family in every center, family child care option, or home-based option in the group selected. So the number of centers (or areas) selected must be limited enough to allow for reviewer thoroughness, yet expansive enough to cover the range of services offered by the grantee. (If the number of centers that are automatically included exceeds the number that can be visited, the team leader may randomly select from new centers and those that are part of the child care partnerships.)

Taking into account the size of the team and the distances between centers, the team leader needs to decide how many additional centers can be selected. These additional centers should represent the variety of center-based services (e.g., part-day and full-day). If the grantee has delegate agencies, the selected centers must include at least one that is operated by each delegate agency that will be visited. In a morning (or an afternoon or evening), each reviewer can be assigned about three classrooms in a single center, one classroom in each of two different centers, or two different family child care homes (if these centers or homes are fairly close to each other). Each reviewer can accompany a home visitor on one home visit in a morning or an afternoon.

Home-based services and family child care homes are generally clustered in geographic areas. If it will not be possible to visit all family child care homes or accompany all home visitors, the team leader should select certain geographic areas for visits. For example, if the grantee's operations cover a five-county area and cluster home visitors by county, the team leader should choose the counties that will be visited. Selection can be random, taking into account the director's knowledge of services in the various counties. If services are very different (e.g., two counties provide home-based services to children with significant disabilities), the selection should reflect the differences.

Using the Selection Tree can be helpful in choosing the centers and geographic areas. To begin, record the names of all centers and areas that may potentially be visited. (The only ones initially excluded will be those operated by delegate agencies that will not be visited.) If the grantee has delegate agencies, be sure to list each center name under the correct delegate agency name. Also, list each geographic area in which the grantee manages family child care homes or home-based options. If the grantee has no delegates, list the centers and areas from left to right, beginning with (1). Then note any special features of each center or area next to its name (e.g., write "EHS" to show the centers operating Early Head Start, "FCC" for a geographic area that operates family child care homes, "CC" for a child care partnership, or "PROB" to indicate the director's concern).

When an initial decision has been made about the selection of centers, the team leader should circle all of these centers on the Selection Tree. It is then advisable to check that the selected group:

- Contains as many new centers as possible;

- Includes child care partnerships, if they exist;

- Represents all program options; and

- Contains at least one center operated by each delegate agency that was selected.

Step 3: Select Classrooms, Family Child Care Homes, and Home Visitors

The next task is to identify the specific staff whose classes or family child care homes will be observed, or who will be accompanied on a home visit. In general, the team leader can randomly choose classes within selected centers or family child care homes in the geographic area selected for visits. For the home-based option, the team leader can randomly select home visitors. However, the team leader does need to keep in mind geographic constraints. A reviewer may be able to see multiple classrooms or homes in a day, but distances between locations should be taken into account when deciding just how many are reasonable.

Begin this step by recording the names of each lead teacher in a center and each family child care provider or home visitor in a geographic area on the Selection Tree. For example, check the name of the center numbered (1) in Step 2. Under number (1) in Step 3 are spaces for five names. Write the name of each relevant staff member, one per line, to indicate the groupings of children in the center's program. Following each name, note whether the person is a lead teacher (LT), a family child care provider (FCC), or a home visitor (HV). Then complete the list for all other centers and geographic areas to be visited.

Step 4: Select Focus Children and Their Families

The final step in the selection process is to choose the children and their families that will be the focus of the data-gathering efforts during the review. Generally, no more than one child per class, family child care home, or home visitor case load is included. It is important to select focus children and their families prior to the review so that grantee staff can schedule the Family Group Interview at times convenient for the adults in focus families. Choosing families in advance also allows the grantee to secure home-based families' permission to invite a reviewer into their home. Team leaders may select "alternates" in case a focus child has moved between the time of selection and the review, a family does not feel comfortable opening their home, or reviewers find concerns and wish to check on additional families. Team leaders need to have contingency plans in case of absent children and help reviewers think of alternate ways to contact parents who are not able to attend the Family Group Interview.

Prior to selection, it is suggested that the team leader obtain rosters, indicating each child's age and noting children with disabilities. Some team leaders may ask for a choice of more than one child per class or home visitor, and then make the final selection. In general, the selection of children is random. However, the team leader may first want to choose children with disabilities from some of the classes or geographic areas, one per class. Inclusion of at least one child with more significant disabilities is recommended. Child care partnerships should also be included when selecting focus children. For the remaining groups, random selection can proceed. Ensure that some 4-year-olds are included so that child outcomes can be fully checked.

The actual number of families may vary due to the distance between sites included in the review and the grantee's program options. For example, if the grantee operates either a home-based or family child care option, a reviewer needs to be assigned families experiencing those options.

Focus children and families are key to data gathering for all Service Reviewers. Data from focus children and families also help systems reviewers understand how well systems support partnership building and delivery of services to children and families. Data gathering on focus children and families may be sufficient to allow reviewers to fully describe grantee services. If reviewers are satisfied that they have a good understanding of the program through the use of this group, they may end their work. However, if the focus children and families raise questions that can be answered only by reviewing additional files, talking with additional staff, or observing in other classes, reviewers should take these extra steps as well.

Note: *When the Selection Tree is complete, the team leader records the classroom, home visit, and focus children assignments on the Team Assignment Worksheet. The grantee may need to fill out additional information in the focus children portion of the Team Assignment Worksheet and then submit it to the team leader.*

Selection Tree

Grantee Name

Step 1: Delegate Names

**Step 2: Center Names
or Geographic Areas**

**Step 3: Lead Teacher/
Home Visitor/
Family Child Care
Provider Names**

Step 4: Child Names

Go to class lists for selection of one focus child per class
or group. Make sure a sample of children with disabilities
is chosen, that child care partnerships and all options are
represented, and that all age groups are included.

SUMMARY OF REVIEW DECISIONS INSTRUCTIONS

The Summary of Review Decisions Worksheet is a tool to help team leaders and other review team members, identify, organize, and track the progression of the following components related to individual Core Questions during team meetings throughout the week: Issues Raised by Team Members, Follow-up Items for Tomorrow, Possible Citations, Related Citations and Core Questions, and Potential Strengths. Notes can be entered for each category on a daily basis (Monday to Thursday, which, on a typical review, are the days when most of the team meetings and review decision collaboration processes occur). The following is a more detailed description for each category listed in the first column of the form:

- **Issues Raised by Team Members:** This space is for any issues or concerns that team members have identified and raised during daily team meetings or throughout the review week. Most of these issues will need some type of follow-up action (e.g., verification through records, interviewing a grantee staff member), which is the next element of the form.

- **Follow-Up Items for Tomorrow:** This area should be used to identify any follow-up action necessary to resolve the issues raised by team members in the first box.

- **Possible Citations:** To make the report writing process easier and faster, it is a good idea to have possible citations for concerns written out during the week, so that by Thursday, review team members already have a good idea of which citations may be cited in the draft Head Start Review Report. Additionally, by checking the citations before Thursday, review team members can determine at an earlier point in the week how a particular concern matches up with the program requirements.

- **Related Citations & Core Questions:** The FY 2005 version of PRISM places an even stronger emphasis on the interrelationships between systems, services, and partnerships. Therefore, review team members should be communicating with one another to determine if a system or service concern is pervasive. This category aims to help guide reviewers in their effort in determining the pervasiveness of a potential area of noncompliance.

- **Potential Strengths:** While strengths can only be finalized by the responsible HHS official or designee, review team members may indicate potential strengths during team meetings. This space is for team leaders to document any potential strengths, if applicable.

Located directly under each Core Question heading, is a space for the team leader to circle the appropriate preliminary review decision based on the review team's activities throughout the week.

EARLY CHILDHOOD DEVELOPMENT AND HEALTH (ECDH)

Core Question 9a:

Prevention and Early Intervention
Review Decision in Draft Head Start Review Report (circle one):
Preliminary Areas of Noncompliance   OR   No Preliminary Areas of Noncompliance

	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 9b:

Health Care Tracking and Follow-up
Review Decision in Draft Head Start Review Report (circle one):
Preliminary Areas of Noncompliance   OR   No Preliminary Areas of Noncompliance

	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 10:

Individualization

Review Decision in Draft Head Start Review Report (circle one):

Preliminary Areas of Noncompliance   OR   No Preliminary Areas of Noncompliance

Core Question 11:		Monday	Tuesday	Wednesday	Thursday
Disabilities Services **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance**	Issues Raised by Team Members				
	Follow-Up Items for Tomorrow				
	Possible Citations				
	Related Citations & Core Questions				
	Potential Strengths				

Core Question 12:		Monday	Tuesday	Wednesday	Thursday
Curriculum and Assessment **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance**	Issues Raised by Team Members				
	Follow-Up Items for Tomorrow				
	Possible Citations				
	Related Citations & Core Questions				
	Potential Strengths				

	Monday	Tuesday	Wednesday	Thursday
Core Question 18: **Child Outcomes** Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

FAMILY AND COMMUNITY PARTNERSHIPS (FCP)

Core Question 13:

Family Partnership Building

Review Decision in Draft Head Start Review Report (circle one):

Preliminary Areas of Noncompliance   OR   No Preliminary Areas of Noncompliance

	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 14:	**Parent Involvement** **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance**			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 15:	**Community Partnerships** Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

PROGRAM DESIGN AND MANAGEMENT (PDM)

Core Question 1: **Program Governance**
Review Decision in Draft Head Start Review Report (circle one):
Preliminary Areas of Noncompliance **OR** **No Preliminary Areas of Noncompliance**

	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 2:	**Planning** **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance**			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 3:	Communication Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 4:	**Record-Keeping and Reporting** **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance** **OR** **No Preliminary Areas of Noncompliance**			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 5:	**Ongoing Monitoring** **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance** **OR** **No Preliminary Areas of Noncompliance**			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 6:	Self-Assessment Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 7:	**Human Resources** **Review Decision in Draft Head Start Review Report (circle one):** **Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance**			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 8:

Fiscal Management
Review Decision in Draft Head Start Review Report (circle one):
Preliminary Areas of Noncompliance   **OR**   **No Preliminary Areas of Noncompliance**

Core Question 16:	Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance			
	Monday	**Tuesday**	**Wednesday**	**Thursday**
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Core Question 17:

Facilities, Materials, Equipment, and Transportation

Review Decision in Draft Head Start Review Report (circle one):

Preliminary Areas of Noncompliance   OR   No Preliminary Areas of Noncompliance

	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				
Potential Strengths				

Reviewer Information
(Appendix III)

Reviewer Job Description

SUMMARY OF RESPONSIBILITIES

Under the direction of the Team Leader, the reviewer performs review assignments that gather required facts to determine the performance of the Head Start grantee being reviewed and completes an acceptable report that accurately and clearly describes areas of noncompliance and/or strengths. The reviewer reports to Danya to accept review assignments, make logistical arrangements for review assignments, meet job requirements as a Danya consultant, and receive compensation. The reviewer reports to the Team Leader for assignments and work responsibilities while on-site at a review.

Job Requirements

- **Knowledge of Head Start:**
  - o Thorough working knowledge of the most updated PRISM instrument, the Head Start Act, the Head Start Program Performance Standards, and other applicable regulations that apply to the assigned service/content area.
  - o Maintenance of and familiarity with up-to-date reference materials provided by the Head Start Bureau, including the latest PRISM Guide.
  - o Knowledge and observance of the Head Start Reviewer Code of Conduct.

- **Ability to Perform Functions and Responsibilities:**
  - o Bring a copy of the Performance Standards for reference.
  - o Prepare in advance for review by reading all materials sent by Danya and Team Leader.
  - o Apply appropriate Performance Standards and other applicable regulations accurately to the assigned service area.
  - o Link areas of noncompliance to the correct Performance Standards and relevant Federal regulations.
  - o Link issues that apply to both services and systems in the monitoring of the grantee's program.
  - o Gather and analyze data for reports using multiple modalities (observations, interviews, and record review) and multiple sources (people, program locations, and documents).
  - o Compile and maintain accurate, adequate notes and other necessary documentation to prepare a written report and support findings.
  - o Use current PRISM guide instructions to complete assigned areas of the report.
  - o Demonstrate ability to write clear and concise reports.
  - o Complete assignments on time.

o Perform basic computer functions, such as typing, cutting and pasting, and importing and exporting data.

- Interpersonal Skills:
  o Display courtesy, tact, and discretion in all communications.
  o Facilitate effective group interviews.
  o Work collaboratively with other team members and Team Leader.
  o Accept direction and respond constructively to feedback.
  o Conduct interviews and discussions with grantee staff, families, and community partners in a respectful manner.
  o Ensure timeliness and professionalism in all activities.
  o Provide assistance to less experienced reviewers when requested.
  o Demonstrate flexibility regarding possible last-minute logistics, such as travel or weather.
  o Manage physical demands of an on-site review, such as travel (especially with programs that require extensive driving) and conducting reviews for 8+ hours a day.

FISCAL REVIEWERS (FIS)

Preferred Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3+ years of employment history.*

Education: Bachelor's degree or higher in accounting or CPA. Minimum of 12 hours of accounting if finance or other business degree is substituted.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
  o At least 3+ years of experience at the level of CFO or equivalent.
  o Head Start experience.
  o Experience in Federal fiscal grantee management.
  o Experience in nonprofit/educational organization auditing and knowledge of Federal regulations, such as Title 45 CFR Parts 74, 92, and the Head Start Act.
  o Documentation of work experience that includes effective integration of management systems and program services.
  o Demonstrated ability to write clear and concise reports.

Minimum Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3 years of employment history.*

Education: Bachelor's degree with at least 12 credits in accounting.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:

   o At least 3+ years of experience in financial management, 3 years of experience at the level of comptroller, or 3 years of experience in OMB Circular A-133 auditing.

   o Documentation of work experience that includes effective integration of management systems and program services.

   o Demonstrated ability to write clear and concise reports.

PROGRAM DESIGN AND MANAGEMENT REVIEWERS (PDM)
Preferred Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 6+ years of employment history.*

Education: Master's degree in public administration, business administration, human resources, early childhood education, child development, health services, or social services.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:

   o At least 6+ years of experience serving in an administrative or management-related position with an early childhood organization serving families with young children (birth to age 5), or serving as a management or organizational development technical assistance consultant to such programs.

   o At least 3+ years of management experience.

   o Documentation of work experience that includes management-level responsibilities for working with governing bodies, strategic planning, development and implementation of communication systems, record keeping, and reporting systems; self-assessment/quality control systems; human resources; and fiscal/budgetary requirements.

   o Documentation of work experience that includes effective integration of management systems and program services.

   o Demonstrated ability to write clear and concise reports.

   o Recent experience working:

      - In a Head Start program

      - In an agency that has a Head Start grantee

      - As a Head Start T/TA provider

      - With a collaborative partner of a Head Start program

Minimum Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3 to 5 years of employment history.*

Education: Bachelor's degree in public administration, business administration, human resources, early childhood education, child development, health services, or social services.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
- o At least 3 to 5 years of experience serving in an administrative or management-related position with an organization serving families with young children (birth to age 5).
- o At least 1 year of supervisory/management-level work experience.
- o Documentation of work experience that includes supervisory/management-level responsibilities for working with governing bodies, strategic planning, development and implementation of communication systems, record keeping, and reporting systems; self-assessment/quality control systems; human resources; and fiscal/budgetary requirements.
- o Documentation of work experience that includes effective integration of management systems and program services.
- o Demonstrated ability to write clear and concise reports.

DISABILITIES REVIEWERS (DIS)
Preferred Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 6+ years of employment history.*

Education: Master's degree or higher in early childhood special education, early childhood education/child development with an emphasis on children with disabilities, or a related service profession as identified in the Head Start Program Performance Standards, Part 1308 - speech-language pathology, audiology, psychological services, physical or occupational therapy, recreational therapy, counseling services/family support services, medical services, school health services, and social work services.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
- o At least 6+ years of experience in an early childhood education/special education-related position that includes responsibilities associated with planning and implementation of services for children (birth to age 5) with disabilities and their

families, as required under the Individuals with Disabilities Education Act (IDEA-Parts B and C), the Americans with Disabilities Act of 1990 (ADA), and Section 504 of the Rehabilitation Act of 1973. This experience should be in inclusive and natural environments and include integrating developmentally appropriate curriculum. Candidates must also have experience in the coordination between developmentally appropriate curriculum, integrating IDEA, and a preschool program that operates within standards (i.e. Head Start Performance Standards, NAEYC, accreditation and/or a state approved preschool curriculum). This could include, but is not limited to, service as a Disabilities Services Coordinator for Head Start/Early Head Start.

o At least 2^+ years of supervisory/team leadership experience in managing service delivery for children (birth to age 5) with disabilities and their families.

o Documentation of work experience that includes effective integration of management systems and program services.

o Demonstrated ability to write clear and concise reports.

Minimum Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3 to 5 years of employment history.*

Education: Bachelor's degree in early childhood special education, early childhood education/child development with an emphasis on children with disabilities, or a related service profession as identified in the Performance Standards, Part 1308 - speech-language pathology, audiology, psychological services, physical or occupational therapy, recreational therapy, counseling services/family support services, medical services, school health services, and social work services.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
o At least 3 to 5 years of experience in an early childhood education/special education-related position that includes responsibilities associated with planning and implementation of services for children (birth to age 5) with disabilities and their families, as required under the Individuals with Disabilities Education Act (IDEA-Parts B and C), the Americans with Disabilities Act of 1990 (ADA), and Section 504 of the Rehabilitation Act of 1973. This experience should be in inclusive and natural environments and include integrating developmentally appropriate curriculum. Candidates must also have experience in the coordination between developmentally appropriate curriculum, integrating IDEA, and a preschool program that operates within standards (i.e. Head Start Performance Standards, NAEYC, accreditation and/or a state approved preschool curriculum). This could include, but is not limited to, service as a Disabilities Services Coordinator for Head Start/Early Head Start.

o Documentation of work experience that includes effective integration of

management systems and program services.

o Demonstrated ability to write clear and concise reports.

CHILD DEVELOPMENT/EARLY CHILDHOOD EDUCATION REVIEWERS (ECD)
Preferred Qualifications
*Years of experience as a Head Start reviewer **cannot** be included in the 6+ years of employment history.*

Education: Master's degree in a field related to early childhood education, child development, child psychology, child and family services, or human development (with emphasis on child development).

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
o At least 6+ years of experience in a Head Start, public, or private child development program for children birth to age 5 (e.g., lead teacher, early interventionist, early childhood consultant) at the local, regional, or national level.
o At least 3+ years of early childhood supervisory or management experience.
o Documentation of work experience that includes supervisory responsibility for planning and implementing an appropriate early childhood curriculum that meets the needs of diverse children and their families; supervising lead teachers and assistant teachers; and lead responsibility for overseeing and participating in child observations, assessments, and individualization.
o Documentation of work experience that includes effective integration of management systems and program services.
o Demonstrated ability to write clear and concise reports.

Minimum Qualifications
*Years of experience as a Head Start reviewer **cannot** be included in the 3 to 5 years of employment history.*

Education: Bachelor's degree in a field related to early childhood education, child development, child psychology, child and family services, or human development (with emphasis on child development).

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
o At least 3 to 5 years of experience in a Head Start, public, or private child development program for children birth to age 5 (e.g., lead teacher, early interventionist, early childhood consultant) at the local, regional, or national level.

o Documentation of work experience that addresses the responsibility for planning and implementing an appropriate curriculum that meets the needs of diverse children and their families; supervising classroom staff; and participating in child observations, assessments, and individualization plans.

o Documentation of work experience that includes effective integration of management systems and program services.

o Demonstrated ability to write clear and concise reports.

HEALTH REVIEWERS (HE)
Preferred Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 6+ years of employment history.*

Education: Bachelor's degree or higher in a health-services discipline, such as public health, nursing, physician assistant, nutrition, health education, health administration, or other health-related discipline.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:
o At least 6+ years of experience in a health-related position that serves young children (birth to age 5) and their families; as a consultant on health issues in medical or social service agencies, public schools, hospitals, or other health-related organizations; or with Head Start at a local, regional, or national level.

o At least 3+ years of supervisory experience in a health-related position that includes experience in coordinating comprehensive and integrated health services for young children (birth to age 5) and their families.

o Documentation of work experience that includes health-related services to young children (birth to age 5) and their families in the following areas: health and safety, nutrition, mental health, and children's medical care.

o Documentation of work experience that includes effective integration of management systems and program services.

o Demonstrated ability to write clear and concise reports.

Minimum Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3 to 5 years of employment history.*

Education: Associate's or bachelor's degree in a health-services discipline, such as health science/public health, health education, nursing, physician assistant, nutritional services/food management, or other health-related discipline.

Licensing: Evidence of meeting any existing current professional Federal and State licensing

requirements if currently working in the profession.

Work Experience:

o At least 3 to 5 years of experience in a health-related position that serves young children (birth to age 5) and their families in medical or social service agencies, public schools, hospitals, or other health-related organizations; or with Head Start at a local, regional, or national level.

o Documentation of work experience that includes health-related services to young children (birth to age 5) and their families in the following areas: health and safety, nutrition, mental health, and children's medical care.

o Documentation of work experience that includes effective integration of management systems and program services.

o Demonstrated ability to write clear and concise reports.

FAMILY AND COMMUNITY PARTNERSHIP REVIEWERS (FCP)
Preferred Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 6+ years of employment history.*

Education: Bachelor's degree or higher in child development, social work/social services, psychology, counseling, or a related discipline.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:

o At least 6+ years in a social work/social services, case management, counseling, or behavioral child development-related position (including provision of technical assistance and consultant employment to provide services in these areas) with programs that include a significant proportion of low-income families with children birth to age 5.

o At least 3+ years of supervisory experience in one or more of the above-mentioned service areas.

o Documentation of work experience that includes family support and early intervention activities, which is not limited to counseling and clinical interventions.

o Documentation of work experience that includes effective integration of management systems and program services.

o Demonstrated ability to write clear and concise reports.

Minimum Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3 to 5 years of employment history.*

Education: Associate's or bachelor's degree in child development, social work/social

services, psychology, counseling, or a related discipline.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:

o   At least 3 to 5 years in a social work/social services, case management, counseling, or behavioral child development-related position with programs that include a significant proportion of low-income families with children birth to age 5.

o   Documentation of work experience that includes family support and early intervention activities, which is not limited to counseling and clinical interventions.

o   Documentation of work experience that includes effective integration of management systems and program services.

o   Demonstrated ability to write clear and concise reports.

EARLY HEAD START REVIEWERS (EHS)

Preferred Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 6+ years of employment history.*

Education: Master's degree in a field related to early childhood education, child development or health services (i.e. nursing, child psychology/counseling and family support services, and/or infant mental health), with special training, coursework, and/or certification in infant/toddler development, and/or services to pregnant women.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:

o   At least 6+ years of experience in an Early Head Start, public, or private child development program for children birth to age 3 (e.g., infant/toddler specialist, early interventionist, early childhood consultant) at the local, regional, or national level.

o   At least 3+ years of early childhood supervisory or management experience.

o   Documentation of work experience that includes supervisory responsibility for planning and implementing an appropriate infant and toddler curriculum that meets the needs of diverse children and their families; supervising lead teachers and assistant teachers; lead responsibility for overseeing and participating in child observations, assessments, and individualization plans; and overseeing and providing services to pregnant women.

o   Documentation of work experience that includes effective integration of management systems and program services.

o   Demonstrated ability to write clear and concise reports.

Minimum Qualifications

*Years of experience as a Head Start reviewer **cannot** be included in the 3 to 5 years of employment history.*

Education: Bachelor's degree in a field related to early childhood education, child development or health services (i.e. nursing, child psychology/counseling and family support services, and/or infant mental health), with special training, coursework, and/or certification in infant/toddler development, and/or services to pregnant women.

Licensing: Evidence of meeting any existing current professional Federal and State licensing requirements if currently working in the profession.

Work Experience:

o At least 3 to 5 years of experience in an Early Head Start, public, or private child development program for children birth to age 3 (e.g., infant/toddler specialist, early interventionist, early childhood consultant) at the local, regional, or national level.

o Documentation of work experience that addresses the responsibility for planning and implementing an appropriate infant and toddler curriculum that meets the needs of diverse children and their families; supervising classroom staff; participating in child observations, assessments, and individualization plans; and providing services to pregnant women.

o Documentation of work experience that includes effective integration of management systems and program services.

o Demonstrated ability to write clear and concise reports.

Report Coordinator Job Description

REPORTS TO

- Danya for accepting assignments and travel arrangements, meeting job requirements as a Danya consultant, and compensation.
- Team Leader (TL) for assignments and work responsibilities while on-site at a review.

OVERALL RESPONSIBILITY

The Report Coordinator is accountable to the TL for producing an on-site report that meets both the TL's content specifications, and the report-writing requirements established by the Head Start Bureau.

MINIMUM REQUIREMENTS

The candidate must exhibit or demonstrate the following knowledge and skills:

- **Knowledge of Head Start:**
  - o Thorough working knowledge of Head Start Performance Standards and core questions, with the ability to quickly and accurately locate and recall individual Performance Standards, as needed, as well as the groupings of Standards under core questions.

- **Ability to:**
  - o Write clearly and concisely at an 8th grade reading level, using correct grammar.
  - o Analyze draft written materials and rewrite/reorganize them for clarity and sequence of thought.

- **Ability to use computer:**
  - o Typing skills of 40-50 words per minute.
  - o General knowledge of computer hardware and ability to "get around" the computer.
  - o Thorough knowledge of word processing and ability to use MS Word.
  - o Ability to use HSMTS formatting, including importing and exporting data.

- **Interpersonal skills:**
  - o Ability to multitask.
  - o Ability to work collaboratively with others around common assignments.
  - o Ability to accept direction.

TASKS TO BE PERFORMED

The Report Coordinator must have the ability to perform the following tasks while working onsite with a team at a Head Start review.

PREPARE FOR THE REVIEW
- Studies and comprehends the content, and processes materials sent by TL in advance of the opening team meeting.
- Discusses with the TL what supplies should be brought by the Report Coordinator and brings them to the review (e.g., printer cartridges, disks, paper, etc.).
- Provides a working laptop, which has the most current version of HSMTS, and a working printer for the on-site review.
- Confers with TL before the review or during opening team meeting to define specific report-writing responsibilities, the editing process that will be followed, and coordination of available computer usage so that there is a minimum reliance on handwritten submissions.

PARTICIPATION AT OPENING TEAM MEETING
- Takes notes, if requested by TL, at the opening team meeting.
- In collaboration with the TL, as requested, discusses the report-writing process with the team during the meeting, outlining tasks the Report Coordinator will complete and timetables for completion.

PARTICIPATION IN THE ONGOING REVIEW AND AT TEAM MEETINGS
- Applies a thorough working knowledge of the Head Start Performance Standards and the core questions so as to assist the team in meeting report-writing requirements.
- As requested by the TL, takes notes at agency and team meetings, and edits, copies, and distributes them to the team in a timely manner.
- As requested by the TL, fulfills reviewer functions for completing core question assignments, using on-site review techniques and strategies and completing any report-writing responsibilities associated with the assignments.

PREPARATION OF REPORT
- Completes report-writing responsibilities for core question reviewer assignments carried out by the Report Coordinator.
- Assists reviewers with report-writing by:
    - o Coaching on elements of good writing;
    - o Typing handwritten reports for reviewers as specified in the plan;
    - o Bringing to the attention of the TL any outstanding issues that are barriers to completing an acceptable on-site report; and
    - o Providing technical support for use of computer software, coordinating use of available laptop computers, and resolving any computer hardware and/or software problems that occur.
- Follows the agreed-upon editing process.
- Communicates with reviewers about any substantive edits to their submissions and gives them an opportunity to comment.

- Imports reviewer written submissions into HSMTS and prepares a final report by:
    - o Checking the appropriateness and accuracy of the citations, and the extent to which the text and the citations match up.
    - o Editing and/or rephrasing reviewer written submissions to correct grammatical and spelling errors, and to achieve clarity and consistency.
    - o Communicating with reviewers on needed substantive edits or changes.
    - o Typing and printing multiple edits of the report.
    - o Exporting the report to a disk and deleting the report from the computer.

Policies and Procedures for Team Leader/Grantee Right of Refusal

The procedures described below are designed to promote effective and timely implementation of the Right of Refusal policy described in the Advance Activities section of the *PRISM Guide.*

Both the team leader and grantee each have the right to refuse one reviewer from a review team assigned to a Danya trip ID. In other words, one team leader and one grantee right of refusal is allowed per Danya trip ID number. For example, if one review/Trip ID includes reviewers for the grantee operated program as well as delegates, the right of refusal applies to one reviewer from that trip/review. If additional modifications are necessary, the Regional Office must submit a Request for Exception to the Associate Commissioner, Head Start Bureau, for approval.

The Grantee Right of Refusal applies to triennial reviews only, while the Team Leader Right of Refusal applies to all reviews. However, both types of refusals do not apply to Erroneous Payment Reviewers.

The Right of Refusal policy is an additional mechanism for ensuring a thorough and high-quality review. While team leaders and grantees should exercise the Right of Refusal where appropriate, they are encouraged to consider it thoughtfully and use it only when deemed necessary for the effectiveness of the review.

From the team leader perspective, a reviewer may not have the appropriate set of skills for the review or the reviewer may present a personal or professional conflict. If the skill set is the issue, and the required skills were indicated on the Review Team Request Form, the team leader may want to discuss the situation with the Regional Review Coordinator (RRC) before exercising the Right of Refusal. There may be situations where the RRC was unable to match the exact skill set requested by the team leader for a particular review. Exercising the right of refusal may not result in a reviewer with a more appropriate skill set.

For the grantee, the Right of Refusal is designed to provide the opportunity to remove any one reviewer who presents a personal or professional conflict from the grantee perspective. It is not the grantee's responsibility to assess reviewer's skill sets and determine their appropriateness for the review. Grantees need not justify their replacement request.

Once the RRC confirms "team completion" in the database, an automated email is sent to the team leader and to an additional back-up ACF regional staff person (designated by the Region to assist the grantee notification process should the team leader be out of the office. The Region may identify more than one back-up person). The email will indicate the team is complete and direct them to the Web site for a team summary. The email will indicate that the team will be considered final if the RRC has not received a request for replacement by the given date (8 business days from the notification of team completion).

The Region has 3 business days to forward the team listing (in writing, containing names only, and suggested methods include email and fax for timeliness reasons) to the grantee. The grantee has 5 business days from receipt of the team listing to inform the team leader in writing (email or fax acceptable and recommended) if they choose to request replacement of one reviewer. The team leader will notify the RRC immediately and no later than the date provided in the original team completion email from the RRC.

NOTE: Team leader and grantee review of the completed team should take place concurrently. That is, if the team leader is considering or has made a decision regarding removal of a reviewer, the complete team listing should be forwarded to the grantee.

If the team leader is requesting the replacement, he/she must complete the Reviewer Change Order Form, secure approval of the change through the Regional Office approval procedure (same as the Review Team Request Form approval process), and fax the form to the RRC. If the grantee is requesting the replacement, the team leader must complete the Change Order Form and fax it along with the grantee's written request for replacement to the RRC. (The grantee replacement request does not have to go through the Regional Office approval process.)

Upon receipt of the team leader or grantee reviewer replacement request, the RRC will notify the reviewer that the team leader or grantee has requested a replacement reviewer for their content area and they are therefore being removed from the review team. If appropriate, the RRC will attempt to schedule the reviewer for another team.

The RRC will use the computer assisted reviewer selection process to replace the reviewer. The RRC will notify the team leader once a replacement is confirmed and the team leader will notify the grantee. The replacement reviewer is not subject to appeal or refusal.

After team leader and grantee review, replacements made due to reviewer cancellation or reviewers added to the team at the request of the team leader are not subject to Team Leader or Grantee Right of Refusal. Additionally, the following guidelines apply to the replacement reviewers:

- Reviewers who are last-minute replacements (within 1 week of the review) for team members will not have the substitution review count against the number of reviews they can conduct per year.

- In those instances in which the reviewer is dismissed early in the week (before Wednesday), the Regional Review Coordinator will attempt to provide a replacement if requested by the team leader.

- Replacement reviewers who join the team mid-week may be from within the state but will be subject to all conflict of interest clauses in their contract and the Reviewer Code of Conduct.

Code of Conduct for Head Start Monitoring Reviewers

The standards of performance listed below provide standard requirements and expectations for Head Start monitoring reviewers. Each reviewer must sign this document at the beginning of each review season prior to participating in any monitoring reviews. An electronic copy remains on file at Danya International, Inc. ("Danya"); the reviewers shall retain a copy for their records. The standards are divided into the following categories: Preparation, Review Procedures and Guidelines, Conflict of Interest, and General Professional Standards.

Preparation

1. Reviewers must represent their education, experience, and skills accurately, as described in the reviewer profile maintained and updated by Danya for the Head Start Bureau. Reviewers shall accept assignments only in content areas matching their expertise.

2. Reviewers shall remain knowledgeable of Head Start or Early Head Start performance standards and applicable regulations, and they must understand their role as a review team member.

3. Employees working for a Head Start and/or Early Head Start grantee must obtain the required prior approval from the grantee to participate in reviews. A staff member of a deficient grantee and its delegate will not be allowed to participate in reviews until the grantee has been removed from deficiency status. Reviewers must notify the Regional Review Coordinator (RRC) of any change of employment status with the grantee.

4. Reviewers must be prompt in all appointments. If unexpected events delay appearance for an appointment, notify those who are waiting—as well as the team leader—of the change or delay.

5. Reviewers must be prepared to participate in all meetings at the starting time.

6. Reviewers should proactively download the PRISM instrument and latest PRISM software (www.headstartreviews.com).

7. Reviewers must make a proactive effort to remain current on reviewer standards, special announcements, and policy changes by making regular (quarterly) visits to the Monitoring Reviewer Web site.

8. Reviewers are responsible for notifying the RRC as soon as possible when travel delays or other emergencies cause a delay or cancellation of the scheduled travel plans.

Review Procedures and Guidelines

9. The team leader is the primary responsible agent for the conduct of each review, throughout the review process, and in all interactions with the grantee. Reviewers should:

    a. Follow the schedules and procedures as outlined by the team leader using the current Head Start PRISM instrument and requirements to complete the assignments.

    b. Gather and analyze critical information based solely on the *Head Start Program Performance Standards* and applicable regulations.

    c. Coordinate with the team leader to request information and documentation only as required by the current PRISM instrument and process. Give ample opportunity for program staff members to provide information or documentation needed for the collection and analysis of data to complete the assignment.

    d. Follow the grantee's chain of command and procedures for reviewing documentation. Return all program materials to the grantee (or as instructed by the team leader) as soon as possible and no later than the closing meeting with the grantee.

    e. Prior to the summary meeting, prepare and submit to the team leader a written summary and a report of findings as assigned, in accordance with the current PRISM format. Note that responses and notes regarding the Core Questions should be provided in the corresponding sections for that question.

    f. Confer with the team leader regarding interpretation of the Federal regulations.

    g. Refer unusual questions (those that fall outside their area of expertise or outside of responsibilities as a review team member), sensitive issues, and program and community complaints to the team leader for response.

    h. At the end of the review, all information is considered property of the Federal Government and will be submitted to the team leader. All electronic files are to be deleted from reviewer laptop computers before the summary meeting.

    i. Protect the confidentiality of all child, family, and staff files by securing and returning them to proper custody.

    j. Reviewers must initial and date all pages of documentation, such as notes, Core Questions, and other completed tools.

Conflict of Interest

10. Any potential conflict of interest or appearance of a conflict of interest must be disclosed at the time of request to serve as a team member on a review. This includes disclosing work as a previous reviewer, consultant, or potential consultant for the grantee being reviewed.

11. Reviewers must remove themselves from participation or discussion at any point that a perceived conflict of interest may arise, or if any other reason exists whereby objectivity or the review itself could be compromised.

12. Reviewers should have no contact with a grantee for a period of 12 months before and after the review occurs.

General Professional Standards

13. Complete and strict confidentiality is required on all matters and information associated with the grantee being reviewed, including all files (individual, child, family, and staff) and documents reviewed. All discussions and findings pertaining to the grantee and review findings shall not be discussed in public places during the onsite visit. Do not discuss information about the substance and findings of the review with anyone except the team leader, team members, and persons expressly designated by the team leader.

14. Reviewers must adhere to Federal guidelines concerning acceptance and giving of gifts.

15. Reviewers must refrain from alcohol consumption during business hours, including evening meetings associated with the onsite review. Abuse of alcohol or any other drug, legal or illegal, will result in immediate dismissal from the current review by the team leader and permanent removal from the pool of eligible reviewers.

16. Sexual harassment (slurs, jokes, epithets, touching, impeding, body blocking, leering, suggestive gestures, or any other unsolicited, written, verbal, physical, or visual contact with sexual overtures) will result in immediate dismissal from the current review by the team leader and permanent removal from the pool of eligible reviewers.

17. Promotion of services (personal, other firms, or colleagues) in any way or provision of technical assistance to the grantee or any staff members, constituents, or parents during the review is strictly prohibited. Generally, reviewers and any entities associated with the reviewer, should refrain from entering into any work assignments, paid or otherwise, pertaining to a grantee being reviewed for at least 12 months prior to or following completion of the review.

18. Reviewers must behave in a professional manner during the review. Always be courteous, pleasant, and respectful in asking questions, taking part in discussions, or other interactions with the grantee. Respect the knowledge and experience of the grantee staff members, parents, contract staff members, and community partners. Do not engage in gossip or office politics during interactions with program staff members, parents, contract staff members, and community partners. Unprofessional conduct may result in immediate dismissal from a review by the team leader.

19. Reviewers must dress appropriately for work in the grantee's environment. Reviewers should follow local agency work rules regarding smoking, safety, security, food on the

premises, working hours, and other local requirements. Reviewers should request permission before using the grantee's telephone or other equipment for any purpose.

20. Do not offer advice or recommendations to any individual about the quality or operation of the program. Recognize the responsibility of the grantee managers and others to supervise their staff.

21. Always respect the language, culture, and ethnic identity of grantee staff members, parents, contract staff members, and community partners.

22. Reviewers should work collaboratively and cooperatively with other team members. This includes:

    a. Respecting the skills, experiences, and knowledge of fellow team members;

    b. Contributing information and analysis of assignments at each team meeting in a concise and orderly manner to facilitate efficient use of the meeting time; and

    c. Sharing information, actively seeking informed agreement among team members, and fully supporting the final decisions of the team leader.

23. Reviewers must commit to performing and completing PRISM-related tasks ONLY while on assignment. Other distractions should be eliminated (for example, cell phones should be turned off during interviews, data collection, and team meetings).

24. These standards may be updated, modified, or otherwise revised from time to time by Danya and/or the Head Start Bureau. Any such revision will be in writing and provided to reviewers by posting to a Head Start Reviewer-focused Web site prior to its effective date.

Acknowledgement and Acceptance

I have read, understand, and agree to the standards of performance for Head Start monitoring reviewers (September 2004, Version 1), as set forth above. I understand that failure to comply with these standards may result in a decision for dismissal from the review, and the Head Start Regional Office may recommend to Danya that my name be removed from the pool of potential reviewers.

_____
Reviewer's Signature and Date

_____
Printed Name

Resources List
(Appendix IV)

STANDARDS AND REGULATIONS

Americans with Disabilities Act and Child Care

http://www.usdoj.gov/crt/ada/childq%26a.htm

This site provides a list of frequently asked questions with regard to the application of the ADA to child care centers. The list was compiled by the Department of Justice.

Head Start Program Performance Standards

http://www.acf.hhs.gov/programs/hsb/performance/index.htm

The Head Start Regulations, Title 45 of the Code of Federal Regulations, Parts 1301 through 1311, state the required operating procedures and services that Head Start programs are to provide to the children and families they serve. Program Guidance for Parts 1304 and 1308 is included.

Information Memoranda (IMs) and Program Instructions (PIs)

http://www.headstartinfo.org/publications/im_cont.htm

These documents are provided by year of issue on the Head Start Information and Publication Center Web site. Some IMs and PIs that might be helpful during reviews include the following (see Web site for complete listing):

2003 Family Income Guidelines
http://www.headstartinfo.org/publications/im03/im03_03.htm

2002 Family Income Guidelines
http://www.headstartinfo.org/publications/im02/im02_03.htm

2001 Family Income Guidelines
http://www.headstartinfo.org/publications/im01/im01_03.htm

Services to Pregnant Women Participating in Early Head Start
http://www.headstartinfo.org/publications/im02/im02_04.htm

Final Rule on Head Start Transportation
http://www.headstartinfo.org/publications/im01/im01_01.htm

Services to Families with Limited English Proficiency
http://www.headstartinfo.org/publications/im01/im01_02.htm

Financial Management Issues in Head Start Programs Utilizing Other Sources of Funding
http://www.headstartinfo.org/publications/im01/im01_06.htm

Head Start Family Worker Training and Credentialing
http://www.headstartinfo.org/publications/im01/im01_08.htm

Applicability of the Fair Labor Standards Act to Head Start and EHS Grantees
http://www.headstartinfo.org/publications/im01/pi01_01.htm

Child Development Services During Home Visits and Socializations in the Early Head Start Home-Based Program Option
http://www.headstartinfo.org/publications/im00/im00_22.htm

Final Rule on Purchase of Head Start Facilities and Proposed Rule for Construction and Renovation of Head Start Facilities
http://www.headstartinfo.org/publications/im99/im99_01.htm

Guidance on the Interpretation of Federal Public Benefit
http://www.headstartinfo.org/publications/im98/im98_12.htm

National Highway Safety Traffic Administration (NHSTA) Bus Safety
http://www.nhtsa.dot.gov/people/injury/buses/
This site provides updates from the NHSTA on regulations regarding drivers, vehicle operation, and occupant safety for buses.

State Child Care Profiles and Licensing Regulations
http://www.nccic.org/statedata/statepro/index.html
The U.S. map at this site provides links to profiles for each state. Each state profile includes demographic information about child care, as well as contact information for different state agencies, including licensing and regulatory agencies, involved in child care.

45 CFR 74 - Uniform Grants Administration Regulations

http://www.access.gpo.gov/nara/cfr/waisidx_99/45cfr74_99.html

This site provides uniform administrative requirements for awards and subawards to institutions of higher education, hospitals, other nonprofit organizations, and commercial organizations; and certain grants and agreements with States, local governments, and Indian tribal governments.

45 CFR 92 - Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments

http://www.access.gpo.gov/nara/cfr/waisidx_99/45cfr92_99.html

REVIEW-RELATED FORMS AND INFORMATION

Head Start Reviews Web site

http://www.headstartreviews.com/

From this page, team leaders and reviewers have access to the following forms, documents, and links, via Danya International Inc., the monitoring support contractor:

Reviewer Code of Conduct
http://www.headstartreviews.com/docs/CodeofConduct_Nov2002r3.pdf

Travel Expense Form
http://www.headstartreviews.com/docs/TER.pdf

Certificate of Performance
http://www.headstartreviews.com/docs/cop.pdf

Mileage Log
http://www.headstartreviews.com/docs/MileageLog.pdf

Policy Updates Affecting Head Start Reviewers
http://www.headstartreviews.com/policies.asp

Frequently Asked Questions about Head Start Reviews
http://www.headstartreviews.com/faqs.asp

Monitoring Toolkit
http://www.headstartreviews.com/mt.asp

Disabilities Toolkit
http://www.headstartreviews.com/dt.asp

Early Head Start Toolkit
http://www.headstartreviews.com/et.asp

Team Leader Web site

http://www.headstartreviews.com/

This URL also provides access to the password-protected **Team Leader Web site.** Click on FTL home and enter your ID and Password. Then, click on the PRISM Training and Support Contract to enter the PRISM Home Page. From the **PRISM Home Page,** you have access to PRISM training materials, manuals, minutes from National Monitoring Workgroup conference calls, and Head Start Monitoring reports.

Also, from the password-secure portion of the **Team Leader Web** site (http://www.headstartreviews.com/), you can click on the Monitoring Support Contract link to access the Regional Office/FTL Main Page provided by Danya, Inc., (also, see above at Head Start Reviews). This page provides links to **Head Start Review Tracking System** data, the **Grantee Profile**, the **Review Team Request Form**, **Incident Report Form**, and other reports, forms, and instructions.

Fiscal Assistant

http://www.acf.hhs.gov/programs/hsb/hsfa/

The Fiscal Assistant Web site provides authoritative information for Head Start managers and fiscal staff. Browse the site by fiscal topic. The site includes plain-language narratives that explain Head Start fiscal requirements, audit considerations, and related information, as well as answers to Frequently Asked Questions (FAQs).

The site also features a Fiscal Assistant Library. Items in the Library include the Head Start Act, Office of Management and Budget circulars, Department of Health and Human Services regulations, Information Memoranda, Program Instructions, Departmental Appeals Board Decisions and more. The Fiscal Assistant Search Engine allows users to locate Library documents containing specific words, phrases, and regulation citations.

The Head Start Information and Publication Center

http://www.headstartinfo.org/infocenter/infocenter.htm

In addition to IMs and PIs, this Web site provides links to other useful documents, including program toolkits, a Federal Register Alert Archive, and an online request form to query their Information Services team. For instance, Early Head Start tipsheets can be found at http://www.headstartinfo.org/infocenter/ehs_tipsheet/

Early Head Start National Resource Center Information Resources

http://www.ehsnrc.org/InformationResources/Index.htm

The information at this site includes print and video materials, research abstracts, and links to related Early Head Start World Wide Web resources. The material is organized according to the framework of the *Head Start Program Performance Standards.*

SOFTWARE

PRISM Head Start Monitoring Tracking System

http://www.headstartreviews.com

This site provides access to the PRISM Software that assists team leaders and Head Start reviewers in organizing and recording their findings during reviews. Reviewers use PRISM to generate reports that summarize findings. PRISM Software includes the text of the Performance Standards and allows users to search the standards by keyword. XTRIA provides technical support for reviewers and can be reached through their technical support hotline at 1-800-518-1932 or 703-821-6154 or via e-mail at prismsoftware@xtria.com.

Grant Application Budget Instrument

http://www.acfgabi.com

The Grant Application Budget Instrument (GABI) is a software application designed to simplify and expedite the grant application process.