

**Office of Head Start Policy clarifications on the hiring of key staff and Board approval of refunding proposals and Quality Improvement Plans (QIPS)**

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
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	3. Originating Office: Office of Head Start	
	4. Key Word: Key Staff Hires; Grantee Boards	

**PROGRAM INSTRUCTION:**

**TO:** Head Start and Early Head Start Grantees and Delegate Agencies

**SUBJECT:** Office of Head Start Policy clarifications on the hiring of key staff and Board approval of refunding proposals and Quality Improvement Plans (QIPS)

**INFORMATION:**

The Office of Head Start, in this Program Instruction, is seeking to provide clarification on two policy issues which have come to our attention recently. These are the role that all grantee boards are expected to play in regards to the submission to the Regional Office of refunding applications and Quality Improvement plans and the role that the Regional Office will play when Head Start grantees propose the hiring of any new staff that are considered "key personnel".

**Grantee Board**

All Head Start grantees must have a governing board. In most cases this governing board is directly responsible for oversight of the Head Start grant. In some cases - large city governments, for example, - the agency's board does not exercise direct oversight of the Head Start grant but rather has delegated this responsibility to an organization which then functions as the grantee board. In either case, there is a body which has responsibility for the Head Start grant. This body cannot delegate this responsibility further. That is to say, responsibilities which lie with the Board must be exercised by the Board. Head Start grantees with performance or fiscal problems are often those agencies in which the Board has not been fully involved. In order to assure appropriate Board involvement in an agency's Head Start program, this Office has instructed ACF Regional Offices to not accept any grantee refunding application which is not signed by the Board Chairperson, regardless of any policies or procedures that the agency may have delegating this responsibility to someone else. Likewise any Quality Improvement Plan submitted by a grantee to correct one or more deficiencies must be signed by the Board Chair. (The grantee's Policy Council will, of course, need to approve refunding applications and Quality Improvement Plans, as well.)

We urge all grantee boards to play an active and regular role in the oversight of the Head Start grant.

**Hiring of key staff**

Part 74.25(c) (2) and Part 92.30(d) (3) provide the federal granting agency with authority to approve the hiring of key personnel when such persons are specified in the grant award. Regional Offices have been instructed, beginning FY 2007, to include the Head Start Director and, where salaries are covered principally (i.e.; greater than 50%) by the Head Start grant, the Executive Director and the Chief Financial Officer as key personnel in each Head Start grantee's grant award. Grantees are expected to notify the regional office prior to making a job offer to any staff identified as key personnel. Included in this notification should be the name of the person being recommended to be hired, the process used to recruit for this job and why this person was determined to be the most qualified. Regional Offices will take no more than a few days to respond to the grantee's proposal. The role of Regional Offices will be only to assure that a reasonable process was used by the grantee in seeking to fill this position and that the person recommended for hiring is qualified for the job.

Please direct any questions on either of these two issues to your Regional Office.

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Office of Head Start Policy clarifications on the hiring of key staff and Board approval of refunding proposals and Quality Improvement Plans (QIPS). ACF-PI-HS-06-01. DHHS/ACF/OHS. 2006. English.