FY 2013 Office of Head Start

Monitoring Protocol

September 27, 2012

Blank Page

Table of Contents

FY 2013 OHS Monitoring Protocol Overview

Overview

The Office of Head Start (OHS) presents the FY 2013 Monitoring Protocol, the instrument used to gather data during on-site monitoring reviews. The protocol measures seven (7) areas of grantee performance and contains Key Indicators that are used to assess each grantee. Data gathered about grantees during monitoring reviews is used by the Office of Head Start to evaluate multiple levels of performance, including determining program strengths, concerns, noncompliances, and deficiencies.

The Protocol organizes selected program Performance Standards, the Head Start Act, and fiscal regulations into seven (7) content areas:

1) Program Governance (GOV)
2) Management Systems (SYS)
3) Fiscal Integrity (FIS)
4) Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)
5) Child Health and Safety (CHS)
6) Family and Community Engagement (FCE)
7) Child Development and Education (CDE)

Organization of the Protocol

Key Indicators & Compliance Measures

Each of the seven (7) content areas contains Key Indicators of Program Performance, simply called **Key Indicators.** Each Key Indicator contains a series of Compliance Measures (CM). The Compliance Measures are the specific statements that collectively assess the level of program performance for each Key Indicator, focusing on one or more Federal regulations critical to the delivery of quality services and the development of strong management systems.

Targeted Questions

Targeted Questions (TQ) for each compliance measure are designed to provide guidance to on-site reviewers and to ensure a standardize method for evidence collection. Reviewers are required to answer all Targeted Questions for each Compliance Measure. The Targeted Questions indicate the people to interview, questions to ask, information to retrieve from documents, observations to conduct, and management systems to analyze in order to determine the level of grantee performance for each Key Indicator.

Guides

In the OHSMS Software the Guides align the Targeted Questions with the way reviewers collect information in the field. Guides pull together all of the Targeted Questions related to a particular method and source of evidence collection (e.g. Health Coordinator Interview). The responses to each Targeted Question in a Guide are linked to the appropriate Key Indicator and Compliance Measure.

In FY 2013, the following guides are used by Reviewers:

- Interviews
- Documents
- Observations
- Child Files
- Staff Files

In the OHSMS Software the Guides and Protocol can be customized to reflect the type of program being reviewed (e.g., center-based, family child care, home-based, migrant), and the types of children or populations being served by the program (e.g., infants and toddlers, preschool-age children, pregnant women and new mothers). When targeted questions only apply to a specific program option or population, an "Applies To" marker will be located below the question (e.g., Applies to: Center-based programs).

Program Governance Introduction

Program Governance (GOV) is designed to assess the level in which grantees implement governance practices that ensure effective oversight of program operations by the governing body and active participation in decision-making by the Policy Council. Head Start programs must ensure that governing board and Policy Council are composed of the required members. Members of both groups must receive training necessary to fulfill their responsibilities, including the opportunity to analyze reports designed to inform decisions regarding program planning, assessment, design, and overall operations. By monitoring Program Governance, the OHS is better able to ensure that programs establish practices to ensure effective oversight and informed decision-making.

Key Indicators of Program Performance

1. Structure and Participation

    The program has the required structure and process in place to promote full participation of the governing body and Policy Council.

2. Roles, Responsibilities, and Training

    The governing body and Policy Council fulfill all of their responsibilities to ensure the effective oversight of the program.

3. Reporting to Governing Body and Policy Council

    The program provides all of the required reports to the governing body and Policy Council to ensure they have the necessary information to make decisions and provide effective oversight of the program.

Program Governance

Key Indicator #1 – Structure and Participation

The program has the required structure and process in place to promote full participation of the governing body and Policy Council.

Compliance Measures	Federal Regulations
1.1 The program has a governing body composed of: • At least 1 member with background and expertise in accounting or fiscal management • At least 1 member with background and expertise in Early Childhood Education and Development • At least 1 member who is a licensed attorney familiar with the issues that come before the governing body • Additional members who reflect the community, including parents of formerly or currently enrolled Head Start/Early Head Start children • Other members selected for their expertise in education, business administration, or community affairs If individuals do not meet the qualifications of Fiscal Management/Accounting, Early Childhood Education and Development, or being a licensed attorney, the program shall use a consultant or other individual with relevant expertise and qualifications.	642(c)(1)(B)(i-iv) 642(c)(1)(B)(vi)
1.2 The program has established a Policy Council, elected by parents of currently enrolled children, whose membership is composed of a majority of parents of children currently enrolled in the program as well as members of the community served by the Head Start agency. *Note: Applies to grantees only*	642(c)(2)(B)(i) 642(c)(2)(B)(ii)(I-II)

Targeted Questions—GOV 1.1

Governing Body—Interview

► Determine whether the governing body has the correct composition to provide effective oversight of the Head Start program.

Ensure that the governing body has all of the following:

• At least 1 member with fiscal/accounting background and expertise
• At least 1 member with early childhood education and development background and expertise
• At least 1 member who is a licensed attorney
• Members that reflect the community served and includes parents of children who are currently, or were formerly, enrolled in Head Start programs

If the composition of the governing body does not include individuals with the required qualifications, determine whether the governing body uses consultants or other individuals with relevant expertise and qualifications to meet the composition requirements.

GOV 1.1

Governing Body—Document

► Ask the program to provide you with documentation to ensure that the required members exist and are an active part of program oversight. Review the documents to confirm that the governing body has the required membership or uses consultants to fill each of the required roles. Specify any missing roles required in board composition in your notes.

GOV 1.1

Targeted Questions—GOV 1.2

Policy Council—Interview

► Determine whether the Policy Council has the correct composition to effectively fulfill its roles and responsibilities.

Ask about the selection process. How does the program ensure that the Policy Council meets the composition requirements? Does the Policy Council composition meet the following requirements?

- Composed at least 51 percent of parents of children who are currently enrolled in the Head Start agency (including delegate agencies)
- Includes at least one member of the at-large community served by the program or any delegate agency
- Members elected by parents of children currently enrolled in the program

GOV 1.2

Policy Council—Document

► Based on the information gathered during your Policy Council (PC) interview, ask the program to provide the documents that you need to confirm whether the PC has the appropriate composition, and determine how members are elected.

GOV 1.2

Program Governance

Key Indicator #2—Roles, Responsibilities and Training
The governing body and Policy Council fulfill all of their responsibilities to ensure the effective oversight of the program.

Compliance Measures		Federal Regulations
2.1	Members of the governing body and the Policy Council receive appropriate training and technical assistance to ensure that members understand information they receive and can provide effective oversight of, make appropriate decisions for, and participate in programs of the Head Start agency. *Note: Applies to grantees only*	642(d)(3)
2.2	The governing body is responsible for required activities and makes decisions pertaining to program administration and operations that include: selecting delegates and service areas; establishing procedures and criteria for recruitment, selection, and enrollment; reviewing all applications for funding; and establishing procedures for selecting Policy Council members.	642(c)(1)(E)(iv)(I-III) 642(c)(1)(E)(iv)(VI)
2.3	The governing body exercises fiscal and legal responsibility and oversight and reviews and approves all major program policies.	642(c)(1)(E)(iv)(V)(aa-cc) 642(c)(1)(E)(iv)(VII)(aa-dd) 642(c)(1)(E)(iv)(VIII) 642(c)(1)(E)(iv)(IX)
2.4	The Policy Council approves and submits decisions about identified program activities to the governing body. *Note: Applies to grantees only*	642(c)(2)(A) 642(c)(2)(D)(i-viii)

Targeted Questions—GOV 2.1

Policy Council—Interview

► Determine whether the Policy Council members receive training that is specific to their roles as PC members and how the training has helped them make decisions about the Head Start program.

GOV 2.1

Governing Body—Interview

► Determine whether the governing body receives training that is specific to their roles as governing body members and how the training has helped them make decisions about the Head Start program.

GOV 2.1

Policy Council—Document

► Ask the program to provide you with documentation of Policy Council training, including:

- PC meeting agendas and minutes that describe the training
- Sign-in sheets to determine who attended

Determine whether your document review confirms what you heard during the interview. Is the training related to the Policy Council's roles and responsibilities? Did members attend?

If you have additional questions, have the Director identify the appropriate staff person to interview to gather additional evidence.

GOV 2.1

Governing Body—Document

► Ask the program to provide you with documentation of governing body training, including:

- Governing body meeting agendas and minutes that describe the training
- Sign-in sheets to determine who attended

Determine whether your document review confirms what you heard during the interview. Is the training related to the governing body's roles and responsibilities? Did members attend?

If you have additional questions, have the Director identify the appropriate staff person to interview to gather additional evidence.

GOV 2.1

Targeted Questions—GOV 2.2

Governing Body—Interview

► Determine whether the governing body exercised responsibility with respect to each of the following:

- Establishing procedures and criteria for recruiting, selecting, and enrolling children
- Selecting delegate agencies, as appropriate
- Developing procedures for selecting Policy Council members
- Reviewing applications for funding and amendments to applications for funding

Have members provide examples of how each of these responsibilities have been exercised.

GOV 2.2

Governing Body—Document

► If you were not able to assess the governing body's role in the listed responsibilities through the governing body interview, ask the program to provide you with the governing body meeting minutes or other documents, as needed, to determine whether the governing body exercised responsibility regarding all of the following:

- Establishing procedures and criteria for recruiting, selecting, and enrolling children
- Selecting delegate agencies, as appropriate
- Developing procedures for selecting Policy Council members
- Reviewing applications for funding and amendments to applications for funding

GOV 2.2

Targeted Questions—GOV 2.3

Governing Body—Interview

► Determine how the governing body engages in the oversight of the program's legal and financial decisions. Ascertain how it ensures the fiduciary health and well-being of the program and determine whether it is effective in ensuring the fiscal integrity of the agency.

During your interview, determine how the governing body assumes responsibility for all of the following:

- All major financial expenditures of the agency
- The operating budget of the agency
- The selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors to report all critical accounting policies and practices to the governing body
- The financial audit
- The agency's progress in carrying out the programmatic and fiscal provisions in the agency's grant application, including implementation of corrective actions
- Monitoring of the agency's actions to correct any audit findings and other actions necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices

GOV 2.3

► Determine how engaged the governing body is in each of the required approval processes:

- The annual Self-Assessment
- Personnel policies of the agency regarding the hiring, evaluation, termination, and compensation of agency employees
- Results from monitoring conducted under section 641A(c), including appropriate follow-up activities
- Personnel policies and procedures, including policies and procedures regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency

GOV 2.3

Governing Body—Document

► If the governing body interview or a discussion with the Fiscal Reviewer indicates concerns about the oversight of fiscal and legal decisions, review governing body documents as needed.

Determine whether all of the following were reviewed and approved by the governing body:

- All major financial expenditures of the agency
- The operating budget of the agency
- The selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors to report all critical accounting policies and practices to the governing body
- The financial audit

- The agency's progress in carrying out the programmatic and fiscal provisions in the agency's grant application, including implementation of corrective actions
- Monitoring of the agency's actions to correct any audit findings and other action necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices

GOV 2.3

► If the governing body interview indicates concerns about the oversight of program operations, review the governing body documents as needed.

Determine whether all of the following were reviewed and approved by the governing body:

- The annual Self-Assessment
- Personnel policies of the agency regarding the hiring, evaluation, termination, and compensation of agency employees
- Results from monitoring conducted under section 641A(c), including appropriate follow-up activities
- Personnel policies and procedures, including policies and procedures regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency

GOV 2.3

Targeted Questions—GOV 2.4

Policy Council—Interview

► Determine how the Policy Council engages in the oversight of program operations.

Collect evidence of how members review information from reports to approve decisions about program design and operations and any necessary changes or improvements.

Focus your interview on how the PC is engaged in the approval and submission of decisions to the governing body in each of the following required decision-making areas:

- Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start program is responsive to community and parent needs
- Program recruitment, selection, and enrollment priorities
- Applications for funding and amendments to applications for funding
- Budget planning for program expenditures, including policies for reimbursement related to and participation in PC activities
- By-laws for the operation of the PC
- Program personnel policies and decisions regarding the employment of program staff, consistent with 642(c)(1)(E)(iv)(IX), including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff
- Developing procedures for how members of the PC of the Head Start program are elected
- Recommendations on the selection of delegate agencies and the service areas for such agencies
- Program design and operation
- Planning goals and objectives

GOV 2.4

Policy Council—Document

► If the Policy Council interview or a discussion with the Fiscal Reviewer, ERSEA Reviewer or FCE Reviewer indicates concerns, ask the program to provide documentation that supports the Policy Council's active participation and decision-making in the following areas (as appropriate):

- Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start program is responsive to community and parent needs
- Program recruitment, selection, and enrollment priorities
- Applications for funding and amendments to applications for funding
- Budget planning for program expenditures, including policies for reimbursement related to and participation in PC activities
- By-laws for the operation of the PC
- Program personnel policies and decisions regarding the employment of program staff, consistent with 642(c)(1)(E)(iv)(IX), including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff
- Developing procedures for how members of the PC of the Head Start program are elected
- Recommendations on the selection of delegate agencies and the service areas for such agencies

GOV 2.4

Program Governance

Key Indicator #3–Reporting to Governing Body and Policy Council
The program provides all of the required reports to the governing body and Policy Council to ensure they have the necessary information to make decisions and provide effective oversight of the program.

Compliance Measures	Federal Regulations
3.1 Governing body and Policy Council members regularly receive and use information or reports about program planning, policies, and program operations, including: • Monthly financial statements, including credit card expenditures • Monthly program information summaries • Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency • Monthly reports of meals and snacks provided through USDA programs • Financial audit • The annual Self-Assessment, including findings related to such assessment • The community-wide strategic planning and needs assessment (i.e., the Community Assessment) of the Head Start agency, including applicable updates • Communication and guidance from the Secretary • Program Information Reports *Note: Applies to grantees only. Single or multiple reports may be used to capture the information listed above.*	642(d)(2)(A-I)

Targeted Questions—GOV 3.1

Policy Council—Interview

► Determine how often the following reports are received by the Policy Council and discuss with the members the quality and usefulness of the reports. Document how often each report is received.

Annual reports:

- The financial audit
- The Self-Assessment, including any findings related to such assessment
- Program Information Reports (PIRs)

Monthly Reports:

- Financial statements, including credit card expenditures (if the program uses credit cards)
- Program information summaries
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Reports of meals and snacks provided through programs of the U.S. Department of Agriculture (USDA)

Additional reports:

- Every 3 years, the community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency
- Applicable current updates from the Secretary (i.e., Program Instructions, Information Memoranda, etc.)

Ask the members whether the reports they received contributed useful and timely information that supported the Policy Council's decision-making. If the reports are of poor quality and cannot be used by the Policy Council, capture that in your notes.

GOV 3.1

Governing Body—Interview

► Determine how often the following reports are received by the governing body and discuss with the members the quality and usefulness of the reports. Document how often each report is received.

Annual reports:

- The financial audit
- The Self-Assessment, including any findings related to such assessment
- Program Information Reports (PIRs)

Monthly Reports:

- Financial statements, including credit card expenditures (if the program uses credit cards)
- Program information summaries
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Reports of meals and snacks provided through programs of the U.S. Department of Agriculture (USDA)

Additional reports:

- Every 3 years, the community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency
- Applicable and current updates from the Secretary (i.e., Program Instructions, Information Memoranda, etc.)

Ask members if the reports they received contributed useful and timely information that supported the governing body's decision-making. If the reports are of poor quality and cannot be used by the governing body, capture that in your notes.

GOV 3.1

Governing Body—Document

► If you identified concerns related to the quality or timeliness of reports during your interview of the governing body, identify documentation that will help you validate this information. Ask the Director for documentation that will help you determine whether reports were provided within the required timeframes and how the governing body was able to use the reports for program design, oversight, or improvement.

GOV 3.1

Policy Council—Document

► If you identified concerns related to the quality or timeliness of reports during your interview of the Policy Council, identify documentation that will help you validate this information. Ask the Director for documentation that will help you determine whether reports were provided within the required timeframes and how the Policy Council was able to use the reports for program design, oversight, or improvement.

GOV 3.1

Blank Page

Management Systems Introduction

Management Systems (SYS) is designed to assess the systems Head Start programs establish and the level of impact the implementation of these systems has on services to children and families. The OHS defines a Management System as "the framework of processes and procedures used to ensure that an organization can fulfill all tasks required to achieve its objectives." Effective Management Systems are important to ensure that Head Start and Early Head Start programs function at their optimum level to provide high-quality services to children and families. There are five systems critical to program performance: program planning, ongoing monitoring, human resources, communication, and record keeping and reporting. The OHS has identified key elements for each system that support effective implementation of services to children and families. This section also contains an overall summary of each service area, fiscal, and program governance, identifying the strengths of each (when applicable). By monitoring Management Systems, the OHS is better able to ensure that programs establish systems designed to implement both the Head Start Program Performance Standards and the Head Start Act, and to ensure sustainable high-quality services are delivered to families and children, grantees must have effective systems in place.

Key Indicators of Program Performance

1. Program Planning

   The program engages in a process of planning that includes its strategic use of information to continually plan for program management and service delivery, ensures compliance with Federal regulations, and engages key stakeholders in the planning process.

2. Ongoing Monitoring

   The program has an effective system for monitoring its management, operations and delivery of services.

3. Human Resources

   The program implements human resource practices to promote safe and healthy environments for staff, children and families and to provide quality services to children and families.

4. Communication

   The program's communication system is designed to promote timely and accurate communication between the program and all stakeholders (e.g., parents, policy groups, staff, and community).

5. Record Keeping and Reporting

   The program's record-keeping and reporting system is implemented to promote quality services, and ensure confidentiality of children, families, and staff.

6. Strengths and Summaries

   The Review Team's summaries of each service area in the context of systems, including strengths as applicable.

Management Systems

Key Indicator #1—Program Planning

The program engages in a process of planning that includes its strategic use of information to continually plan for program management and service delivery, ensures compliance with Federal regulations, and engages key stakeholders in the planning process.

Compliance Measures	Federal Regulations
1.1 The program, in consultation with staff, governing bodies, policy groups, and other community organizations, routinely engages in a process of systematic planning that utilizes the results of the Community Assessment, Self-Assessment, and other information to develop long- and short-term goals for improvement and written plans for service implementation.	1304.51(a)(1) 1304.51(a)(1)(i-iii)
1.2 At least annually, the program conducts a Self-Assessment of program effectiveness that assesses progress in meeting local program goals and objectives, evaluates program compliance with Federal requirements, and results in improvement plans that are approved by the governing body and submitted to the OHS.	641A(g)(1) 641A(g)(2)(B)

Targeted Questions—SYS 1.1

Head Start/Early Head Start Director—Interview/Debrief

▶ With the Head Start Director, discuss the program's planning process and review the program's planning documents including the annual Self-Assessment, the most current Community Assessment, and any documentation on the short term and long-range goals the program has established during its planning process.

Specific elements of the planning system you need to document during your discussion include:

- How the program uses information to develop long and short-range goals, objectives and plans for program management, fiscal, and service delivery:
  - o Describe some examples of the grantees long and short range plans for both program and fiscal operations.
  - o Describe how the program uses the Community- Assessment, Self-Assessments, and other information for program planning.
- How the program uses the results of planning activities to design change and implement services provided to children and families:
  - o How does the program know whether it is meeting their goals and what changes have they made based on information learned through the planning process?
- How are stakeholders engaged in the planning process (e.g., governing bodies, staff, parents):
  - o Use this debriefing to inform or confirm what you learned from the governing body and Policy Council. Determine whether those bodies truly have a role in designing the program and developing and evaluating the long- and short-term goals of the grantee.
  - o What input was received from the governing body, policy council, staff and parents? How was it used to develop plans?

SYS 1.1

Review Team Meeting—Interview

► Does the program use information strategically to develop goals, objectives and plans for program management and service delivery?

SYS 1.1

► Does the program use the results of planning activities to design change and implement services provided to children and families?

SYS 1.1

► Does the program engage stakeholders in the planning process (governing bodies, staff, and parents)?

SYS 1.1

Systems Summary—Program Planning

► Provide a comprehensive summary of the Program Planning System that includes each of the Key Elements:

- The program's strategic use of information to develop goals, objectives and plans for program management and service delivery
- How the program uses the results of planning activities to design change and implement services provided to children and families
- Stakeholder engagement in the planning process (governing bodies, staff and parents)

SYS 1.1

Targeted Questions—SYS 1.2

Head Start/Early Head Start Director—Interview/Debrief

► With the Head Start Director, review the program's Self-Assessment.

Use this information to strengthen what you know about planning, including who is involved, how goals and objectives are identified and evaluated, how the quality of service areas is assessed, and how improvement plans are developed. Assess the comprehensiveness of the Self-Assessment process.

Specific elements of the Self-Assessment you need to document during your discussion include:

- How frequently it is conducted, what is evaluated, and who is included in the process
- Describe what the program does when it finds that it needs to make an improvement, who is involved in those decisions, and if an improvement plan is submitted
- How the program evaluates all service areas and fiscal operations

Gather additional information on how the program evaluates the achievement of program goals and objectives during the self-assessment.

SYS 1.2

Management Systems

Key Indicator #2—Ongoing Monitoring

The program has an effective system for monitoring its management, operations and delivery of services.

Compliance Measures	Federal Regulations
2.1 The program established and implements procedures for the ongoing monitoring of its operations and services to ensure compliance with Federal regulations and progress towards program goals.	641A(g)(3)

Targeted Questions—SYS 2.1

Head Start/Early Head Start Director—Interview/Debrief

► With the Head Start Director, discuss the program's ongoing monitoring system. Use this debriefing to gain an understanding of the timeliness, effectiveness, and integrity of the Head Start program's ongoing monitoring system.

Specific elements of the system to understand and document during your discussion with the Head Start Director include:

- Tools and procedures are used effectively and consistently by program staff
- The frequency of monitoring is adequate to ensure compliance with the regulations and Head Start Act
- The staff responsible for and/or participates in ongoing monitoring activities are performing their specific role(s)
- The program analyzes information gathered through ongoing monitoring
- The analysis of data is used to monitor
- If applicable, the process in place to ensure the ongoing monitoring of delegate agencies is implemented

SYS 2.1

Health Services Coordinator—Interview

► This program has not been open for 90 days (or 30 days for programs operating shorter durations). Based on your file review and the information you gather from this interview question, assess whether the program has a system in place to ensure that health care determinations are made on time.

Interview the Health Coordinator to identify the program's process for ensuring determinations are made as to whether children are up-to-date on a schedule of age-appropriate preventive and primary health care (including state EPSDT requirements) within 90 days of program entry. Ask the Health Coordinator:

- What is the process the program uses to ensure all children have a determination (as to whether they are up-to-date on preventive and primary health care) within 90 days of entry into the program?

- What tasks are involved in this process? How frequently are the tasks carried out? Who is responsible for carrying them out?
- If the program determines that a child is not up-to-date, what steps does the grantee take? Who is responsible for taking these steps?

Note: Applies only to programs that have been in operation for less than 90 days at the time of the on-site review (or 30 days for programs operating shorter durations)
SYS 2.1

▶ This program has not been open for 45 days (or 30 days for programs operating shorter durations). Based on your file review and the information you gather from this interview question, assess whether the program has a system in place to ensure that screenings are completed in a timely manner.

Interview the Health Coordinator to determine whether the program has a process for ensuring that all children receive the required screenings within 45 calendar days of their entry into the program.

- What process does the program use to ensure all children enrolled receive the required screenings within 45 days of entry?
- What tasks are involved in this process? How frequently are the tasks carried out? Who is responsible for carrying them out?
- If the program determines that a child has not received all required screenings, what steps does it take? Who is responsible for taking these steps?

Note: Applies only to programs that have been in operation for less than 45 days at the time of the on-site review (or 30 days for programs operating shorter durations)
SYS 2.1

Review Team Meeting—Interview

▶ Are tools and procedures used effectively and consistently by program staff?

SYS 2.1

▶ Is the frequency of monitoring adequate to ensure compliance with the regulations?

SYS 2.1

▶ Are all staff who are responsible for and/or participate in ongoing monitoring activities performing their specific role(s)?

SYS 2.1

▶ Does the program analyze information gathered through ongoing monitoring?

SYS 2.1

▶ Does the program use their analysis of data to inform monitoring?

SYS 2.1

▶ If applicable, is there a process in place to ensure the ongoing monitoring of delegate agencies is implemented?

SYS 2.1

Systems Summary—Ongoing Monitoring

► Provide a comprehensive summary of the program's Ongoing Monitoring System that includes each of the Key Elements:

- Tools and procedures are used effectively and consistently by program staff
- The frequency of monitoring is adequate to ensure compliance with the regulations
- The staff responsible for and/or participates in ongoing monitoring activities are performing their specific role(s)
- The program analyzes information gathered through ongoing monitoring
- The analysis of data is used to monitor
- If applicable, the process in place to ensure the ongoing monitoring of delegate agencies is implemented

SYS 2.1

Management Systems

Key Indicator #3—Human Resources

The program implements human resource practices to promote safe and healthy environments for staff, children and families and to provide quality services to children and families.

Compliance Measures	Federal Regulations

3.1   The program has established an organizational structure that supports the following:
 	
● Accomplishment of program goals
● Major functions and responsibilities assigned to each staff person, including, at a minimum:
  ○ Program Management
  ○ Child Development and Education, including Disabilities services
  ○ Child Health and Safety
  ○ Family and Community Engagement
● Adequate mechanisms for staff supervision and support
	1304.52(a)(1-2)

3.2 The program develops and implements written standards of conduct that are available to all staff and contain provisions for appropriate penalties when violations occur.	1304.52(i)(1) 1304.52(i)(1)(i-iv) 1304.52(i)(3)
3.3 The program ensures that each staff member completes an initial health examination (including screening for tuberculosis) and periodic re-examinations (as recommended by his or her health care provider or as mandated by State, local, or Tribal laws).	1310.16(b)(3) 1304.52(k)(1)
3.4 Prior to employing an individual, the program obtains a: ● Federal, State, or Tribal criminal record check (CRC) covering all jurisdictions in which it provides Head Start services to children ● Federal, State, or Tribal CRC as required by the law of the jurisdiction in which the program provides Head Start services ● CRC as otherwise required by Federal law	648A(g)(3)(A-C)

Targeted Questions—SYS 3.1

Head Start/Early Head Start—Interview/Debrief

► Ask how the organizational structure supports the program's goals and objectives. Base your discussion on the specific goals and plans that the Head Start Director has shared with you in your planning discussion and information you have gathered from the Review Team members, if applicable.

How does the organizational structure address the major functions and responsibilities of the program? What staff are assigned to each role?

If vacancies exist, ask how the program adjusts to ensure the role is taken on by other staff. Determine whether services to children and families are negatively impacted by the vacancy. If so, document how long the vacancy has existed and how it impacts services.

How does the organizational structure provide adequate mechanisms for staff supervision and support (e.g., teacher's ability to implement curriculum, supervision of maintenance staff to ensure safe environments, training to appropriate staff on ERSEA policies and documentation)?

SYS 3.1

Review Team Meeting—Interview

► Does the program's organizational structure support the program's goals and objectives?

SYS 3.1

► Does the program's organizational structure address the major functions and responsibilities assigned to each staff position?

SYS 3.1

► Does the program provide adequate mechanisms for staff supervision and support?

SYS 3.1

Systems Summary—Human Resources

► Provide a comprehensive summary of the program's Human Resources System that includes each of the Key Elements:

- Supports the program's goals and objectives
- Addresses the major functions and responsibilities assigned to each staff position
- Provides adequate mechanisms for staff supervision and support

SYS 3.1

Targeted Questions—SYS 3.2

Head Start/Early Head Start Director—Interview/Debrief

► If there were any violations of the program's standards of conduct, talk to the Head Start Director about such violations and determine how appropriate penalties are or were applied.

SYS 3.2

Targeted Questions—SYS 3.3

Staff File

► Has a tuberculosis (TB) screening been completed?

SYS 3.3

► Has the initial health examination been completed?

SYS 3.3

► Have re-examinations been completed as needed? (Re-examinations may need to occur only once, or they may need to be periodic.)

SYS 3.3

► Is there documentation bus drivers completed medical examinations before performing duties establishing that they possess the physical ability to perform job-related functions, with any necessary accommodations?

Note: Applies only to Bus Drivers

SYS 3.3

Head Start/Early Head Start—Interview/Debrief

► If any staff members did not receive health examinations, talk to the Head Start Director about what policies are in place, why examinations were not completed, and what, if any, steps will be taken to correct the issue.

SYS 3.3

Health Exams

► Review the list or tracking system that the program uses to track staff health exams. Determine whether teacher aides/assistants, food preparation staff, bus monitors and FCE staff received a tuberculosis screenings, an initial health exam (including screenings), and any necessary re-examinations.

If you have concerns regarding the data in the tracking system, or if the team's staff file reviews have found a large number of staff are missing health exams, compare a sample of the data from the tracking system with the actual staff files of teacher aides/assistants, food preparation staff, bus monitors, and FCE staff.

Clearly document the number of staff without documentation of tuberculosis screening, an initial health exam, and any necessary re-examinations. Indicate the source of the evidence: the program's tracking system, staff files, or both.

SYS 3.3

Targeted Questions—SYS 3.4

Criminal Record Checks—Document

► Ask the Head Start Director or Human Resources Manager for a copy of the criminal record check (CRC)-tracking data that indicates the date each (CRC) was completed and the date of hire for each staff member.

Use this tracking sheet during your discussions with the Reviewers to compare the accuracy of what they saw in the files with what is seen in the tracking system.

Determine whether the program has completed CRCs and whether CRCs were completed prior to hire for the following staff: teacher aides/assistants, food preparation staff, bus monitors, and FCE staff. If you have concerns regarding the information documented in the CRC-tracking data, or if the team's staff file reviews have found a large number of staff completed CRCs late or not at all, compare a sample of the data from the tracking system with the actual staff files of the teacher aides/assistants, food preparation staff, bus monitors, and FCE staff.

Clearly document the number of staff without documentation. For staff who were hired in the last 12 months document those who did not have a CRC completed prior to hire.

SYS 3.4

Staff File

► Did the program obtain one of the following for the employee?

- A State, Tribal, or Federal criminal record check covering all jurisdictions where the grantee provides Head Start services to children
- A State, Tribal, or Federal criminal record check as required by the law of the jurisdiction where the grantee provides Head Start services
- A criminal record check as otherwise required by Federal law

SYS 3.4

► Was the criminal record check conducted prior to employment?

SYS 3.4

► Was the employee hired within the last 12 months? Was the criminal record check conducted prior to employment?

SYS 3.4

Head Start/Early Head Start Director—Interview/Debrief

► If any staff members did not have a CRC or were hired within the last 12 months and did not have a CRC completed prior to hire, talk to the Head Start Director regarding the policies in place, why checks were not completed, and what, if any steps will be taken to correct the issue.

SYS 3.4

Management Systems

Key Indicator #4—Communication

The program's communication system is designed to promote timely and accurate communication between the program and all stakeholders (e.g., parents, policy groups, staff, and community).

Compliance Measures	Federal Regulations
4.1 The program has mechanisms in place for the provision of timely and accurate information to parents, policy groups, staff and the general community, and the facilitation of regular communication among all program staff to facilitate quality outcomes for children and families.	1304.51(b)

Targeted Questions—SYS 4.1

Head Start/Early Head Start Director—Interview/Debrief

► Describe the process for communicating with the following stakeholders, including the types of information shared with each and the frequency:

- Staff
- Parents
- Policy Groups
- General Community

Ask the HS Director to describe how the program knows the communication facilitates quality outcomes for children and families.

SYS 4.1

Review Team Meeting—Interview

► Does the program provide timely and accurate information to parents, policy groups, staff, and the general community?

SYS 4.1

► Do mechanisms exist for regular communication among all program staff to facilitate quality outcomes for children and families?

SYS 4.1

Systems Summary—Communication

► Provide a comprehensive summary of the program's Communication System that includes each of the Key Elements:

- Timely and accurate information is provided to parents, policy groups, staff, and the general community
- Mechanisms exist for regular communication among all program staff to facilitate quality outcomes for children and families

SYS 4.1

Management Systems

Key Indicator #5—Record Keeping and Reporting

The program's record-keeping and reporting system is implemented to promote quality services, and ensure confidentiality of children, families, and staff.

Compliance Measures		Federal Regulations
5.1	The program established and maintains a record-keeping system that provides accurate and timely information regarding children, families, and staff and ensures appropriate confidentiality of this information.	1304.51(g)
5.2	The program publishes and makes available to the public an annual report that contains an explanation of the budgetary expenditures and proposed budget for the fiscal year, in addition to an explanation of the agency's efforts to prepare children for kindergarten.	644(a)(2) 644(a)(2)(B) 644(a)(2)(G)

Targeted Questions—SYS 5.1

Head Start/Early Head Start Director—Interview/Debrief

► With the HS Director, discuss the program's record-keeping system.

- What data system does the program use?
- How does the program ensure that the data are accurate and up-to-date? (e.g. ERSEA data, children being kept up-to-date)
- In what ways does the program use their data?
- How does the program ensure data is kept confidential?

SYS 5.1

Review Team Meeting—Interview

► Does the program keep records up-to-date?

SYS 5.1

► Is the program's record keeping system reliable, and are there routine mechanisms for collecting data?

SYS 5.1

► Does the program's record keeping system ensure the accessibility of information to all appropriate parties?

SYS 5.1

► Does the program's record keeping system yield effective reports to inform planning, ongoing monitoring, reporting, and overall communication?

SYS 5.1

► Does the program ensure records are secure and confidentiality of children, families, and staff is maintained?

SYS 5.1

Systems Summary—Record Keeping

► Provide a comprehensive summary of the program's Record Keeping System that includes each of the Key Elements:

- Records are up-to-date
- The system is reliable, and there are routine mechanisms for collecting data
- The system ensures the accessibility of information to all appropriate parties
- The system yields effective reports to inform planning, ongoing monitoring, reporting, and overall communications
- The program ensures records are secure and confidentiality of children, families, and staff is maintained.

SYS 5.1

Targeted Questions—SYS 5.2

Head Start/Early Head Start Director—Interview/Debrief

► Ask about the program's Annual Report to the Public. Ask the Head Start Director to share with you the most current Annual Report. Determine whether the report contains the required explanation of budgetary expenditures, proposed budget for the fiscal year, and information on school readiness and how the grantee works to prepare children for kindergarten. Discuss with the Head Start Director how the Annual Report is made public.

SYS 5.2

Management Systems

Key Indicator #6—Strengths and Summaries

The Review Team's summaries of each service area in the context of systems, including strengths as applicable.

Compliance Measures		Federal Regulations
6.1	Describe one or more program strength(s).	Strength
6.2	Summarize your general impressions of the program's performance in the areas of Fiscal Integrity, Child Health and Safety, Family and Community Engagement, Child Development and Education and Program Governance. *Note: Separate summaries will be written by the appropriate Reviewer for each of the service areas listed above.*	Summary Analysis
6.3	Summarize your general impressions of the program's performance in the areas of Management Systems.	Systems Analysis

Targeted Questions—SYS 6.1

Program Strengths

► Each night as a review team, discuss the grantee's areas of strength. Throughout the week the team should collect additional information in these areas of strength to inform the final documentation of a strength at the end of the week.

SYS 6.1

Targeted Questions—SYS 6.2

Program Governance Summary

► Describe your overall impressions of the area of Program Governance. Determine whether the program has effective systems in place to provide quality services to children and families and is in compliance with the Head Start Program Performance Standards and regulations. Describe any patterns you found, areas of strength, and areas in need of improvement. Remember to consult with other Reviewers (e.g., CHS and FCE Reviewers) about their findings, as appropriate.

SYS 6.2

Fiscal Integrity Summary

► Describe your overall impressions of the grantee's performance in regard to Fiscal Integrity. Determine whether the program has effective fiscal systems in place to support the delivery of quality services to children and families and is in compliance with the Head Start Program Performance Standards and regulations. Describe any patterns you found, areas of strength, and

areas in need of improvement. Remember to consult with other Reviewers (e.g., SYS Reviewer) about their findings, as appropriate.

SYS 6.2

Child Health and Safety Summary

► Describe your overall impressions of the grantee's performance regarding Child Health and Safety services. Determine whether the program has effective systems in place to support the delivery of quality services to children and families and is in compliance with the Head Start Program Performance Standards and regulations. Describe any patterns you found, areas of strength, and areas in need of improvement. Remember to consult with other Reviewers (e.g., FCE and CDE Reviewers) about their findings, as appropriate.

SYS 6.2

Family and Community Engagement and ERSEA Summary

► Summarize the results of your review of the program's provision of Family and Community Engagement and ERSEA services. Determine whether the program has effective systems in place to actively engage families and community members in meaningful ways so they both contribute to and actively participate in program activities as is required by the Head Start Program Performance Standards and regulations. Provide support for your determination. Describe any patterns you found, areas of strength, and areas in need of improvement. Remember to consult with other Reviewers (e.g., CHS and CDE Reviewers) about their findings, as appropriate.

SYS 6.2

Child Development and Education Summary

► Summarize the results of your review of the program's provision of Child Development and Education services. Determine whether the program has effective systems in place to support the delivery of quality services to children and families and is in compliance with the Head Start Program Performance Standards and regulations. If the program provides preschool services, include a summary of its approach to school readiness. Describe any patterns you found, areas of strength, and areas in need of improvement. Remember to consult with other Reviewers (e.g., CHS and FCE Reviewers) about their findings, as appropriate.

SYS 6.2

Targeted Questions—SYS 6.3

System Summary—Program Planning

► Provide a comprehensive summary of the Program Planning System that includes each of the Key Elements:

- The program's strategic use of information to develop goals, objectives and plans for program management and service delivery
- How the program uses the results of planning activities to design change and implement services provided to children and families
- Stakeholder engagement in the planning process (governing bodies, staff, parents)

SYS 6.3

System Summary—Ongoing Monitoring

► Provide a comprehensive summary of the program's Ongoing Monitoring System that includes each of the Key Elements:

- Tools and procedures are used effectively and consistently by program staff
- The frequency of monitoring is adequate to ensure compliance with the regulations
- The staff responsible for and/or participates in ongoing monitoring activities are performing their specific role(s)
- The program analyzes information gathered through ongoing monitoring
- The analysis of data is used to monitor
- If applicable, the process in place to ensure the ongoing monitoring of delegate agencies is implemented

SYS 6.3

System Summary—Human Resources

► Provide a comprehensive summary of the program's Human Resources System that includes each of the Key Elements:

- Supports the program's goals and objectives
- Addresses the major functions and responsibilities assigned to each staff position
- Provides adequate mechanisms for staff supervision and support

SYS 6.3

System Summary—Communication

► Provide a comprehensive summary of the program's Communication System that includes each of the Key Elements::

- Timely and accurate information is provided to parents, policy groups, staff, and the general community
- Mechanisms exist for regular communication among all program staff to facilitate quality outcomes for children and families.

SYS 6.3

System Summary—Record Keeping

► Provide a comprehensive summary of the program's Record Keeping and Reporting System that includes each of the Key Elements:

- Records are up-to-date
- The system is reliable, and there are routine mechanisms for collecting data
- The system ensures the accessibility of information to all appropriate parties
- The system yields effective reports to inform planning, ongoing monitoring, reporting, and overall communications
- The program ensures records are secure and confidentiality of children, families, and staff is maintained.

SYS 6.3

Fiscal Integrity Introduction

Fiscal Integrity (FIS) assesses a grantee's compliance with Head Start Performance Standards and Federal cost principle requirements to ensure that programs have sound internal controls, strong reporting systems, and use Federal funds for intended purposes. By monitoring Fiscal Integrity, the OHS is better able to ensure that the overarching goals of Head Start are met through programs that are properly using federal funds to best support children and families.

Key Indicators of Program Performance

1. Financial Management Systems

   The program implements a sound financial system that meets the required Federal standards for financial reporting, accounting records, internal control, budget control, compliance with cost principles, cash management, and administrative costs.

2. Reporting

   The program accurately reports the source and application of funds, distinguishing between the allocation of funds for each Head Start award.

3. Procurement

   The program develops and effectively implements procurement policies and procedures and meets, at a minimum, all requirements in the applicable Federal, State, and local statutes, regulations and administrative rules for Federal grants.

4. Compensation

   The program ensures that salaries charged to the award are reasonable and necessary for the accomplishment of the program's objectives and are allocated to the grant in relationship to the relative benefit received.The program must also be able to provide documentation of all salaries charged to the award.

5. Cost Principles

   The program ensures all costs—direct, indirect, Federal, or non-Federal— charged to the grant award meet the standards of allowability specified in the Federal cost principles.

6. Facilities and Property

   The program complies with all Federal requirements (e.g. adhering to the instructions in the application process and providing required documentation to Regional Offices) associated with the purchase, construction, or major renovation of facilities or equipment purchased with a purchase value of at least $25,000.

Fiscal Integrity

Key Indicator #1—Financial Management Systems

The program implements a sound financial system that meets the required Federal standards for financial reporting, accounting records, internal control, budget control, compliance with cost principles, cash management, and administrative costs.

Compliance Measures	Federal Regulations
1.1 The grantee's financial management systems provide for effective control over and accountability for grant funds, property, and other assets and ensure they are used solely for authorized purposes. *45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.* *Note: This question relates to the "control activities" aspect of internal controls. Control activities are the policies, procedures, techniques, and mechanisms that enforce management directives, such as the process of adhering to requirements for budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, and reviewing, as well as accountability for stewardship of Government resources and achieving effective results.*	74.21(b)(3-4) 92.20(b)(3-4) 1301.32(a)(1)
1.2 The grantee sought and received prior approval in writing for budget changes where prior approval is required and received approval for hiring of designated key personnel. *Note: Applies to grantees only.45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.* *Note: All changes requiring prior approval must be submitted in writing to the Regional Grants Management Officer. If the change involves a budget revision, the program must identify the changes on an SF-424 and an SF-424A. As provided in 45 CFR 74.25(K) and 45 CFR 92.30(A)(1), approval of changes must be in writing and signed by the Regional Grants Management Officer. Hiring of designated key personnel must be approved by the Regional Office as provided in 74.25(c)(2) and 92.30(d)(3).*	74.25 92.30
1.3 The grantee has obtained and maintained required insurance coverage for risks and liabilities. *Note: 1301.11 Applies only to private nonprofit organizations.* *Note: 45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations.*	74.31 1301.11(a-b) 1309.23(a)(2)

Targeted Questions—FIS 1.1

Financial Reports/Accounting Records—Document

► Review grantee correspondence and notices from the Internal Revenue Service, State Income Tax, State Tax Withholding, Workers Compensation and Unemployment Compensation documents. Does any correspondence indicate unresolved compliance issues such as unpaid amounts that were past due, material significant penalties for late, missing or incomplete returns or reports? If yes, describe all unresolved issues in detail and indicate the amount of any levies, taxes, payments, penalties and interest claimed by the authority.

FIS 1.1

► If a review of grantee correspondence and notices from the Internal Revenue Service, State Income Tax, State Tax Withholding, Workers Compensation and Unemployment Compensation documents revealed that there were unresolved issues with late payroll taxes or late insurance premiums, can the agency document that no portion of the taxes or insurance premiums were related to the Head Start program?

FIS 1.1

► Are there amounts due but not remitted (e.g. unpaid taxes or insurance premiums)? If yes, did the grantee draw down funds from PMS For the unremitted taxes or premiums?

FIS 1.1

Fiscal Officer—Interview

► What method does the program use to ensure that funds are available for payment of any vested accrued leave owed to employees of the grantee?

FIS 1.1

► What is the program's procedure for reviewing credit card charges to insure that only authorized signatories use agency credit cards and that charges are reasonable and necessary for program operations?

FIS 1.1

► Since the completion of the most recent audit, have there been significant changes in fiscal staffing or to financial systems? If so, how has potential negative impact associated with these changes been mitigated?

FIS 1.1

► Is the grantee current in processing of transactions, payments to vendors, and production of financial reports for staff, the Board, and the Policy Council?

FIS 1.1

► Is the agency current in its payments to the Internal Revenue Service and State tax authorities (significant amounts not remitted when due and/or significant penalties, interest or levies related to late filings or late remittance)?

FIS 1.1

General Ledger—Document

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

   FIS 1.1

► Review two consecutive bank statements. Are bank statements reconciled to the general ledger? Are reconciling items (including outstanding checks) resolved within 30 days? Do checks clear the bank by the second statement after the issue date?

   FIS 1.1

► Do the grantee's fiscal records differentiate development and administrative costs from program costs to insure that development and administrative costs do not exceed 15 percent of the total grant (unless a waiver granting a higher percentage has been received)?

   FIS 1.1

Regional Office Correspondence (FIFO)—Document

► Were there other fiscal concerns expressed by the Regional Office?

   FIS 1.1

► Were there concerns with the implementation of the grantee's EHS or ARRA Expansion award (if applicable)?

   FIS 1.1

► Were any Regional Office issues of concern identified in connection with the A-133 audit?

   FIS 1.1

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to other fiscal concerns. Record your answer in detail and provide details on any documents that were provided in response to your question.

   FIS 1.1

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to the grantee's EHS or ARRA Expansion funds. Record your answer in detail and provide details on any documents that were provided in response to your question.

   FIS 1.1

Non-Personnel Costs—Transaction

► Are approvals of the documents supporting this transaction consistent with the approval process described in the organization's fiscal policies and procedures? Is the approver someone other than the person making the order? Was a purchase order completed (if required by the organization's policies and procedures)? Please describe the evidence you observed in arriving at your conclusion.

   FIS 1.1

► Is credit card use consistent with the organization's written policy? Please describe the evidence you observed in arriving at your conclusion.

FIS 1.1

Grant Documentation—Document

► Do delegate agency agreements provide the grantee with effective control over program funds, property, and other assets?

FIS 1.1

Targeted Questions—FIS 1.2

General Ledger—Document

► Do financial records support that one-time funds were expended for purposes listed in the Notice of Award (NOA)?

FIS 1.2

► Does the grantee's financial reporting system separately account for the use of one-time funds for the construction, purchase or major renovation of facilities? Were the funds used for the intended purpose?

FIS 1.2

Grant Documentation—Document

► This question is asked to determine whether testing of one-time funds is to be performed. In either of the two most recently completed budget periods, did the grantee receive supplemental funds (excluding training and technical assistance) or one-time funds where the individual Notice of Awards (NOAs) exceeded $100,000 or 3 percent of the base award amount (whichever is greater)?

FIS 1.2

► This question is asked to determine whether testing of prior approval on equipment purchases is to be performed. For the two most recently completed award periods, did the grantee's expenditures on equipment (with a unit cost of $25,000 or more) exceed either $100,000 or 1 percent of the base award amount (whichever is greater)?

FIS 1.2

► For a sample of equipment (with a unit cost of $25,000 or more, purchased during the two most recently completed award periods), was approval of the Grants Management Officer (GMO) or designee obtained before purchase?

FIS 1.2

► Review the grant application for the current award period, the organizational chart and relevant Regional Office correspondence. Is there documentation of approval from the Regional Grants Management Officer (or designee) of key personnel (including approval for key personnel who are different than those on the grant application)?

FIS 1.2

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to key personnel. Record your answer in detail and provide details on any documents that were provided in response to your question.

FIS 1.2

Targeted Questions—FIS 1.3

Insurance Policies—Document

► Can the grantee produce a current certificate showing a fidelity bond or employee dishonesty coverage on officials and employees authorized to disburse program funds?

FIS 1.3

► Review the list of vehicles purchased using Head Start funds. For a sample of vehicles, can the grantee provide current certificates of insurance showing coverage equal to replacement cost?

FIS 1.3

► If the grantee cannot provide current certificates of insurance showing coverage equal to replacement cost, is the coverage on the Head Start vehicle equivalent to the level of coverage on other agency-owned vehicles?

FIS 1.3

► Review the list of locations in which the grantee provides Head Start services. For a sample of locations (donated, leased, or owned), can the grantee provide current certificates of insurance for program service locations covering liability for accidents on the premises?

FIS 1.3

► Review the list of vehicles used by the agency (or its contractors) for the transport of Head Start children. For a sample of vehicles, can the grantee provide current certificates of transportation liability insurance?

FIS 1.3

Fiscal Integrity

Key Indicator #2 – Reporting

The program accurately reports the source and application of funds, distinguishing between the allocation of funds for each Head Start award.

Compliance Measures	Federal Regulations
2.1 Financial reports and accounting records are timely, complete, and contain accurate information pertaining to grant or sub-grant awards, authorizations, obligations, unobligated balances, assets, liabilities, outlays (total expenditures), income, and interest. Reports include: • SF-425/269 (paper-based Federal Financial Report filed to Regional Office); • SF-425/272 (web-based Federal Cash Transactions Report filed with Division of Payment Management); and • USDA/Child and Adult Care Food Program (CACFP) reports. *45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.*	74.21(b)(1-2) 92.20(b)(1-2) 1304.23(b)(1)(i) 1304.51(h)

Targeted Questions—FIS 2.1

Financial Reports/Accounting Records—Document

► Were any USDA/CACFP claims reduced or rejected due to late or inaccurate reporting or improper documentation of costs resulting in a disallowance or reduced payment to the program?

FIS 2.1

► Compare the actual USDA revenue reported on the final, paper-based SF-425 (or SF-269) filed with the budgeted amount of USDA revenue reflected on the GABI and ask the grantee to document the total food cost for the Head Start program and show the sources from which the food costs were paid. Based on your review of this documentation, was Head Start charged for food costs that should have been paid by USDA?

FIS 2.1

► Does the grantee's most current USDA/CACFP compliance review identify any areas of noncompliance related to fiscal issues? If yes, did USDA/CACFP disallow any costs?

FIS 2.1

► Based on your review of the grantee's repayment of costs disallowed by USDA, were Head Start funds used to pay the disallowance?

FIS 2.1

► Is the final, paper-based SF-425 (or SF-269) submitted to the Regional Office reconciled to the audited financial statements and to the General Ledger? Are reasonable explanations furnished for reconciling items?

FIS 2.1

► Did the grantee's accounting records separately identify the source and application for each Head Start award: Federal awards, authorizations, unobligated balances, assets, liabilities, outlays (total expenditures), income and interest?

FIS 2.1

► Did disbursements for the latest award reported on the most recent SF-425/272 vary from the disbursements reflected in the grantee's financial records?

FIS 2.1

► Based on your review of the grantee's records, was it determined that the USDA removed the grantee from participation in the CACFP program?

FIS 2.1

Fiscal Integrity

Key Indicator #3 – Procurement

The program develops and effectively implements procurement policies and procedures and meets, at a minimum, all requirements in the applicable Federal, State, and local statutes, regulations and administrative rules for Federal grants.

Compliance Measures	Federal Regulations
3.1 The grantee implemented procurement procedures that meet, at a minimum, all requirements specified in the applicable Federal, State, and local statutes, regulations, and administrative rules for Federal grants, including a written code or standards of conduct governing the performance of its employees engaged in awarding and administering contracts. Contracts and delegate agency agreements are current, available, signed, and dated, with a complete description of the performance and financial expectations of the grantee and the other parties. The grantee can demonstrate that contractual agreements were met. *45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments; 2 CFR Part 230 for nonprofit organizations; 2 CFR Part 225 for State, local, and Tribal Governments; 2 CFR Part 220 for educational institutions.*	74.42 74.43 74.46 74.47 74.48(a-b) Part 74, App A(3) 92.36(b)(2-3) 92.36(b)(9) 92.36(c)(1) 92.36(i)(1-2) 92.36(i)(5) 220, App A(A)(2)(e) 225, App A(C)(1)(j) 230, App A(A)(2)(g) 642(c)(1)(E)(iv)(X)(aa)

Targeted Questions—FIS 3.1

Procurement—Transaction

► Does each contract require contractors and subcontractors to allow the grantee, awarding agency, U.S. Comptroller General, or any of their duly authorized representatives access to any books, documents, papers, and records of the contractor that are directly pertinent to a specific program for the purpose of making audits, examinations, excerpts, and transcriptions? Please describe the evidence you used in arriving at your conclusion.

    FIS 3.1

► Do contracts in excess of $150,000 include contractual provisions or conditions that allow for administrative, contractual, or legal remedies in instances in which a contractor violates or breaches the contract terms and provide for such remedial actions as may be appropriate and include suitable provisions for termination by the recipient, including the manner by which termination shall be effected and the basis for settlement (92.36(i)(1 and 2), 74.48(a and b))?

    FIS 3.1

► If the procurement is a construction or facility improvement contract or subcontract in excess of $100,000, does each contract require a performance bond and a payment bond on the part of the contractor for 100 percent of the contract price? Describe the evidence you used in arriving at your conclusion.

    FIS 3.1

► Were the grantee's written procurement procedures followed (use of purchase orders, approvals, documentation of cost quotations, etc.)?

FIS 3.1

► Did the grantee accept a bid or offer from a bidder or offeror who was an employee, officer, or agent of the grantee (or immediate family member, partner, employer, or someone about to employ an employee, officer, or agent), or were any individuals included who had a financial interest in the bidder or offer or selected?

FIS 3.1

► If yes, does the grantee have a written policy that prohibits employees engaged in the award and administration of contracts or other financial awards from soliciting or accepting personal gratuities, favors, or anything of significant monetary value from contractors or potential contractors?

FIS 3.1

► How did the grantee provide for open and free competition?

FIS 3.1

► Did the grantee document the basis for its selection of the contractor or vendor (including justification for lack of competition when competitive bids or offers were not obtained)?

FIS 3.1

► Was an analysis made of lease and purchase alternatives where appropriate?

FIS 3.1

► Was some form of cost or price analysis made and documented in the procurement files?

FIS 3.1

► Did the grantee enter into multiple procurement transactions with the same vendor related to the same product, service, or project, resulting in the grantee failing to follow its own written procurement procedures applicable to the total amount paid to the vendor? Please describe the evidence you observed in arriving at your conclusion.

FIS 3.1

► Does the construction, renovation, or repair contracts for a Head Start facility in excess of $2,000 include Davis-Bacon Act language requiring that all laborers and mechanics employed by contractors or subcontractors be paid wages not less than those prevailing on similar construction in the locality, as determined by the Secretary of Labor?

FIS 3.1

Fiscal Integrity

Key Indicator #4 – Compensation

The program ensures that salaries charged to the award are reasonable and necessary for the accomplishment of the program's objectives and are allocated to the grant in relationship to the relative benefit received. The program must also be able to provide documentation of all salaries charged to the award.

Compliance Measures	Federal Regulations
4.1 Original time records are prepared and properly signed by the individual employee and approved by a responsible supervisory official, and an appropriate methodology was used to allocate salaries among Head Start and other programs.	220, App A(C)(4)(a) 220, App A(J)(10)(a-b) 220, App A(J)(10)(d) 225, App A(C)(3)(a) 225, App B(8)(h)(1) 225, App B(8)(h)(3) 225, App B(8)(h)(4) 230, App A(A)(2) 230, App B(8)(m)(1-2)
4.2 Head Start or Early Head Start grant funds are not used as any part of the monetary compensation (e.g. salary, bonuses, severance) of an individual employed by the grantee who is paid at an annual rate in excess of Executive Level II ($179,700 through calendar year 2012).	653(b)
4.3 Total compensation for personal services, including employee wages and incentive compensation payments, charged to the grant are allowable and reasonable. *2 CFR Part 230 for nonprofit organizations; 2 CFR Part 225 for State, local, and Tribal Governments; 2 CFR Part 220 for educational institutions.*	220, App(C)(2-3) 220, App A(J)(10)(a) 225, App A(C)(2)(b) 225, App B(8)(a-b) 230, App A(A)(3)(b) 230, App B(8)(b-c) 230, App B(8)(j)

Targeted Questions—FIS 4.1

Payroll—Transaction

► Is the transaction part of a payroll approved by a responsible official of the organization?

    FIS 4.1

► Is the transaction supported by time and attendance records (e.g., timecards, timesheets, summary records, or other supporting documentation verifying attendance) signed by the employee and approved by a supervisory or authorized official having first-hand knowledge of the actual work performed by the employee?

    FIS 4.1

► Which of the following best describes the allocation of this position?

- The position is allocated at 100% to Head Start or 100% to Early Head Start.
- The position is allocated only between Head Start and Early Head Start.

- The position is allocated between Head Start/Early Head Start and a related program such as child care or state pre-K.
- The allocation includes an unrelated program and/or central administration.

FIS 4.1

▶ Based on a review of available information (e.g., job description, organization chart, classroom rosters, list of programs served by the agency), is the salary properly allocated? Please describe the evidence supporting your conclusion.

FIS 4.1

▶ Which of these best describes the allocation between Head Start and Early Head Start?

- The allocation between Head Start and Early Head Start uses the same percentages as those used in the GABI accompanying the approved funding application.
- The allocation is based on actual activity.
- The allocation uses a base (e.g. total salary dollars in each program, total expenses in each program) that typically requires a Negotiated Indirect Cost Rate Agreement.
- The allocation is based on budgeted dollars, ability to pay, historical time studies, or fixed percentages not supported by rationale.
- The allocation is supported by an activity base (e.g. hours of service, number of children, etc.).
- The grantee uses another allocation methodology not described above.

FIS 4.1

▶ How has the grantee documented actual activity?

- The grantee is an educational institution and uses an allocation method (including personnel activity reports) of after-the-fact confirmation.
- The grantee is a government entity and uses periodic certification demonstrating (at least semi-annually) that the employee worked solely on the Head Start/Early Head Start award during the period covered by the certification.
- The grantee is a nonprofit or governmental institution and uses personnel activity reports.
- The grantee use an allocation methodology not described above.

FIS 4.1

▶ If the grantee uses another allocation methodology, please describe the allocation methodology used. Does the methodology allocate costs in proportion to the benefits received by each program? Please describe the evidence observed in arriving at your conclusion.

FIS 4.1

▶ Were the personnel activity reports prepared at least monthly, and did they coincide with one or more pay periods?

FIS 4.1

▶ Did the activity report account for the total activity for which the employee was compensated?

FIS 4.1

► Was the personnel activity report signed by the individual employee or, for non-profit agencies only, by a responsible supervisory official having first-hand knowledge of the activities performed by the employee?

FIS 4.1

► Is the allocation supported by current data?

FIS 4.1

► Is the allocation base an appropriate measure of the benefit received by each program? Please describe the evidence you observed in arriving at your conclusion.

FIS 4.1

► Which of these best describes the allocation between Head Start/Early Head Start and related program(s), such as State Pre-K or Child Care?

- Cost allocation does not apply because all of the following apply:
  - ○ All children in the related program(s) receive the full range of Head Start services;
  - ○ All children in the related program(s) are income-eligible for Head Start services;
  - ○ The expected revenue from the other program(s) is reflected as non-Federal share on the FAA; or
  - ○ The total enrollment reflected on the FAA includes all children served by all funding sources.
- The allocation is based on actual activity.
- The allocation base (e.g. total salary dollars in each program, total expenses in each program) typically requires a Negotiated Indirect Cost Rate Agreement.
- The allocation is based on budgeted dollars, ability to pay, or fixed percentages not supported by rationale.
- The allocation methodology use one or more activity bases, such as the number of children served, hours of operation or time study or similar analyses based on direct hours of identifiable services provided.
- The grantee use another allocation methodology not described above.

FIS 4.1

► Which of these best describes the allocation between Head Start/Early Head Start and unrelated programs and/or central administration?

- The allocation between Head Start/Early Head Start and unrelated programs and/or central administration is based on actual activity.
- The allocation between Head Start/Early Head Start and unrelated programs and/or central administration uses a base (e.g. total salary dollars in each program, total expenses in each program) that typically requires a Negotiated Indirect Cost Rate Agreement (NICRA) but either the grantee does not have a NICRA or this specific position is not covered by the NICRA.
- The allocation between Head Start/Early Head Start and unrelated programs and/or central administration is based on budgeted dollars, ability to pay, or fixed percentages not supported by rationale.
- The allocation between Head Start/Early Head Start and unrelated programs and/or central administration is supported by an activity base (e.g. number of transactions, number of supervised staff).
- The grantee uses another allocation methodology not described above.

FIS 4.1

Targeted Questions—FIS 4.2

Financial Reports/Accounting Records—Document

► Does the grantee's most recent IRS Form 990 or individual W-2 statement list any employee with compensation exceeding the Level II rate?

FIS 4.2

► For employees identified in the grantee's IRS Form 990 or individual W-2 statements as having compensation exceeding the Executive Level II rate, is any portion of their compensation paid from Head Start funds (directly charged or as part of an indirect rate) or claimed as non-Federal share (match or in-kind)?

FIS 4.2

Regional Office Correspondence (FIFO)—Document

► Were any Regional Office concerns expressed in connection with key personnel?

FIS 4.2

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to key personnel. Record your answer in detail and provide details on any documents that were provided in response to your question.

FIS 4.2

Targeted Questions—FIS 4.3

Fiscal Officer—Interview

► How (and how recently) has the grantee ensured that paid wages are comparable to wages paid for comparable positions within the organization or those paid for similar work in the labor markets in which the organization competes?

FIS 4.3

► If the grantee received COLA funds, were the funds were the funds distributed in accordance with the terms of the grantee's funding award?

FIS 4.3

► If the grantee has an incentive compensation plan, how recently has it been used to compensate Head Start employees and how is reasonableness of payments determined?

FIS 4.3

Payroll—Transaction

► What set of cost principles applies to this organization?

- Part 230—Cost Principles for Non-Profit Organizations
- Part 225—Cost Principles for State, Local, and Indian Tribal Governments
- Part 220—Cost Principles for Educational Institutions

FIS 4.3

► Is the organization predominantly engaged in activities sponsored by the Federal Government?

FIS 4.3

► Does the government unit have similar work in other activities (outside of Federal awards)?

FIS 4.3

► Is the employee pay rate for Head Start work supported by a wage comparability study that establishes comparable compensation for similar work in the labor markets in which the organization competes?

FIS 4.3

► Is compensation consistent with the established policies of the educational institution?

FIS 4.3

► Is compensation consistent with that paid for similar work in other activities?

FIS 4.3

► Did the grantee document that the employee had: (a) achieved cost reduction, (b) met criteria for efficient performance, (c) submitted suggestions or d) achieved safety goals?

FIS 4.3

► Does this transaction include any incentive compensation payments or paid bonuses (with or without an agreement for payment)?

FIS 4.3

► Was incentive compensation paid according to existing incentive compensation agreements entered into between the organization and the employee in good faith before services were rendered or made according to an established plan consistently followed by the organization?

FIS 4.3

Fiscal Integrity

Key Indicator #5—Cost Principles

The program ensures all costs—direct, indirect, Federal, or non-Federal— charged to the grant award meet the standards of allowability specified in the Federal cost principles.

Compliance Measures	Federal Regulations
5.1 The grantee has implemented procedures to determine allowability, allocability, and reasonableness of costs charged against its Head Start and Early Head Start grant awards as required by the applicable cost principles. If the grantee is required to allocate costs between funding sources (including Head Start and Early Head Start awards), the program utilizes a method for allocating costs that reflects the relative degree of benefit for each program receiving the benefit of the allocated cost. *2 CFR Part 225 for State, local, and Tribal Governments; 2 CFR Part 220 for educational institutions. Reasonable: 230, App A(A)(3) 225, App A(C)(2) 220, App A(C)(3) Allowable: 225, App A(C)(1) 220, App A(C)(2) 230, App A(A)(2) Allocable: 225, App A(C)(3) 220, App A(C)(4) 230, App A(A)(4)* *Note: The requirement to allocate costs applies only to programs that do not have a negotiated and approved indirect cost rate OR programs that have a negotiated and approved indirect cost rate and also have other allocated costs.*	220, App A(A)(2)(e) 220, App A(C)(2-4) 225, App A(C)(1-3) 230, App A(A)(2-4)
5.2 Indirect cost charges are supported by a negotiated and approved indirect cost rate. *2 CFR Part 230 for nonprofit organizations; 2 CFR Part 225 for State, local, and Tribal governments; 2 CFR Part 220 for educational institutions.* *Note: Applies only to programs with an approved negotiated indirect cost rate.*	225, App A(C)(3)(a) 230, App A(A)(2)(a) 230, App A(E)(2)(c) 1301.32
5.3 The grantee can demonstrate that all contributions of non-Federal share (NFS), including cash and third-party in-kind (such as donated services, goods or supplies), are necessary and reasonable for accomplishing program objectives, allowable under applicable cost principles, and allocable if also benefiting another award. Financial records are also sufficient and support the verification of adherence to applicable cost principles. *45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, non-profit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.* *Note: The use of cash and in-kind contributions must meet the same standards applicable to an expenditure of grant funds. They must support the accomplishment of program objectives and not benefit individual children or their families.*	74.23(a)(1-5) 74.23(d) 74.23(f) 74.23(h)(1-3) 74.23(i)(1-2) 92.24(a)(1) 92.24(b)(1) 92.24(b)(3) 92.24(b)(6) 92.24(b)(7)(i) 92.24(b)(7)(iv) 92.24(c)(1) 92.24(d) 92.24(e)(2)(i) 92.24(g)
5.4 During each funding period reviewed, the grantee charged to the award only costs resulting from obligations incurred during the funding period.	74.28 92.23(a)

Targeted Questions—FIS 5.1

Journal Entries—Transaction

► Does the cost appear to be necessary and reasonable (not in excess of the amount that would have been paid by a prudent person; of a type generally recognized as ordinary and necessary; properly procured, etc.)? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

► Was the cost allowable under the applicable cost principles? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

► Did the documents supporting the journal entry contain enough information to support the allowability of the cost? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

► Did the documentation show that the cost was allocated to Head Start in proportion to the benefit received?

FIS 5.1

Facilities—Transaction

► Can the grantee document through a space map or other mechanism how the portion of the building allocable to Head Start was determined?

FIS 5.1

Leased Facilities—Transaction

► Does the lease (or affidavit or other document filed as Notice of Federal Interest) acknowledge that the grant incorporated conditions that included restrictions on the use of the property, provide for a Federal interest in the property (as described in 1309.21(d)(3)(ii)), and state that the property may not be used for any purpose inconsistent with that authorized by the Head Start Act and applicable regulations (as described in 1309.21(d)(3)(iii))?

FIS 5.1

Non-Personnel Costs—Transaction

► Did documentation of receipt or acceptance by the program exist before the invoice was processed for payment? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

► Was the cost supported by a contract or an invoice, if appropriate? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

► Does the grantee maintain documentation with adequate information to support a determination that the expense is allowable, reasonable, necessary, and allocable (i.e., supporting the need for the

purchased product and its benefit to Head Start)? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.1

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to cost allocation. Record your answer in detail and provide details on any documents that were provided in response to your question.

FIS 5.1

Regional Office Correspondence (FIFO)—Document

► Is the grantee required to allocate costs between funding sources?

FIS 5.1

► Were any Regional Office concerns expressed in connection with cost allocation by the grantee, including cost allocation concerns identified through the GABI?

FIS 5.1

Cost Allocation Plan—Document

► If the grantee has a written cost allocation plan, does the method for allocating non-personnel costs reasonably reflect the relative degrees of benefit received by programs that share in the costs?

FIS 5.1

► Review the cost allocation plan's treatment of two cost categories (other than occupancy) of significant cost to HS/EHS and answer the following questions:
  ● How did the grantee's cost allocation plan propose to allocate this type of shared cost?
  ● Was the cost allocated in conformance with the grantee's plan? (Answer this question if this type of shared cost was included in non-personnel transaction testing.)
  ● Based on your review, did the allocation methodology (as applied) result in a distribution of costs in reasonable proportion to the benefits received by Head Start?

FIS 5.1

Targeted Questions—FIS 5.2

Financial Reports/Accounting Records—Document

► For the most recently completed award period, does the final, paper-based SF-425 (or SF-269), revenue/expense report, or other financial record reflect a claim for indirect costs?

FIS 5.2

► If the final, paper-based SF-425 (or SF-269), revenue/expense report, or other financial record reflect a claim for indirect costs, does the NOA reflect an award for indirect costs, and does the grantee have a current negotiated Indirect Cost Rate Agreement?

FIS 5.2

► If the grantee has an established Indirect Cost Rate Agreement, is the total indirect cost on the most recent final, paper-based SF-425 (or SF-269 or SF-272) computed per the approved agreement?

FIS 5.2

► Are the indirect costs charged to Head Start also included in the grantee's development and administrative cost for the period? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.2

General Ledger- Document

► Do the grantee's financial records differentiate between indirect cost charges and direct cost charges? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.2

Regional Office Correspondence (FIFO)—Document

► Does the grantee have a current negotiated Indirect Cost Rate Agreement?

FIS 5.2

► If the grantee does not have a current, approved negotiated Indirect Cost Rate Agreement, did the grantee attempt to claim indirect costs on its most recent Final Financial Status Report?

FIS 5.2

► Were any Regional Office concerns identified in connection with indirect costs for this grantee?

FIS 5.2

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to indirect costs. Record your answer in detail and provide details on any documents that were provided in response to your question.

FIS 5.2

Targeted Questions—FIS 5.3

Regional Office Correspondence (FIFO)—Document

► Were any Regional Office concerns expressed in connection with the grantee's applicable non-Federal share requirement?

FIS 5.3

► Did the grantee receive a waiver of non-Federal share?

FIS 5.3

► If the grantee received a waiver of non-Federal Share, indicate the grantee's non-Federal share requirement.

FIS 5.3

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to non-Federal share. Record your answer in detail, and provide details on any documents that were provided in response to your question.

FIS 5.3

Financial Reports/Accounting Records—Document

► Review the supporting schedule for non-Federal share reported on the most recent final, paper-based SF-425 (or SF-269) submitted to the Regional Office. Is the total amount on the grantee's supporting schedule at least as much as the amount reported on the SF-425 or SF-269? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

Non-Federal Share—Transaction

► If applicable to the type of donated service, are claims supported by records identifying the number of children served and the service provided?

FIS 5.3

► For donated space (other than space in family homes or occasional space rental), is the claimed value supported by a current appraisal performed by a licensed independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible official of the recipient? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► For donated equipment, is the amount of the claimed non-Federal share consistent with the fair-market value of equipment of the same age and condition at the time of donation? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► Was the non-Federal share posted to the appropriate award period? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► Was the non-Federal share generated from other Federal programs? If so, from what programs? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► Are donated services documented by the same methods (to the extent feasible) used to support time worked by grantee or delegate employees?

FIS 5.3

► For donated services, is the nature and duration of the activity, service date, location in which the service was performed, and volunteer signature included in the documentation? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► For donated goods, does the amount of the claimed non-Federal share exceed fair-market value?

FIS 5.3

► Does the claimed non-Federal share appear to be reasonable and necessary for the operation of the Head Start program, and was it used to achieve program objectives, thus benefiting the program? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► For donated services, is the rate consistent with those rates paid for similar services in the recipient's organization (including fringe benefits) or the employee's regular rate of pay (for services provided by the employee of another organization),for services not found within the recipients organization, consistent with the rates paid for similar services in the local labor market (including fringe benefits)? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► Is documentation maintained to establish that the value claimed is reasonable for the type of service and the community in which the service is provided? Please describe the valuation approach used by the grantee and the evidence you observed in arriving at your conclusion.

FIS 5.3

► Has the grantee established that the non-Federal-share donation has not been counted toward a match for another Federal award? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► For cash matches, has the grantee established that the claimed match is not from funds paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost-sharing or matching? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► For cash matches, was the cash counted as match when expended and not when received? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► Does the claimed non-Federal share appear to be allowable under the cost principles? Please describe the evidence you observed in arriving at your conclusion.

FIS 5.3

► Did the grantee claim non-Federal share for any transportation provided by parents?

FIS 5.3

► If the grantee claimed the use of parent in-home space as non-Federal share, describe the valuation methodology used for this non-Federal-share transaction.

FIS 5.3

► Did the grantee receive a waiver of non-Federal share?

FIS 5.3

Targeted Questions—FIS 5.4

Payroll—Transaction

► Was the work performed in the award period in which the related payroll cost was charged?

FIS 5.4

Journal Entries, Non-Personnel Costs—Transaction

► Was the cost posted to the award period in which the obligation was incurred?

FIS 5.4

Fiscal Integrity

Key Indicator #6—Facilities and Property

The program complies with all Federal requirements (e.g. adhering to the instructions in the application process and providing required documentation to Regional Offices) associated with the purchase, construction, or major renovation of facilities or equipment purchased with a purchase value of at least $25,000.

Compliance Measures	*Federal Regulations*
6.1 The grantee has established the allowability of costs for owned or leased facilities and has adequately protected any Federal Interest in facilities through the filing of Notices of Federal Interest, insurance, and maintenance of property records. Compensation for the use of facilities owned by the grantee, a delegate agency, or other related party was through depreciation or use allowance based on the cost of the facility (excluding costs paid by Head Start). The grantee obtained advance Regional Office permission for any mortgage or loan agreements using collateral property acquired or subject to major renovation using Head Start funds and has ensured that mortgage/loan agreements include the required provisions.	220, App A(J)(14) 230, App B(11)(a-b) 230, App B(43)(c) 1309.10 1309.20 1309.21(b) 1309.21(d)(1-3) 1309.21(d)(4)(i-iii) 1309.22(a) 1309.22(c) 1309.23(a)(1-2) 1309.31(b) 1309.40
6.2 The grantee has safeguarded equipment purchased using Head Start funds by maintaining complete and accurate equipment records, verifying the accuracy of records by conducting a physical inventory, and following disposition requirements.	74.34(f)(1) 74.34(f)(3) 74.34(g) 92.32(d)(1-2) 92.32(e)

Targeted Questions—FIS 6.1

Regional Office Correspondence (FIFO)—Document

► Did the grantee receive funding during this grant period or any of the two previous grant periods for the purchase, construction or major renovation of a facility?

FIS 6.1

► Does the grantee own any of the facilities used for Head Start purposes?

FIS 6.1

► If the grantee has received funding during this grant period for the purchase, construction or major renovation of a facility, please enter the number (of facilities),total dollar amount of Federal interest, nature of the project and address of the facility for each funded purpose.

FIS 6.1

► Were any concerns expressed by the Regional Office in connection with the grantee's construction, purchase or major renovation of any facility?

FIS 6.1

Fiscal Officer—Interview

► Has the grantee received a notice of default on any mortgage or security agreement on a property with Federal interest?

FIS 6.1

► Can the grantee document that the Regional Office was informed of all instances of default related to properties with a Federal interest?

FIS 6.1

Grant Documentation—Document

► What is the number of grantee-owned facilities charged to Head Start or claimed as non-Federal share?

FIS 6.1

Facilities—Transaction

► Which of these best describes the arrangement of this modular facility?

- The modular is permanently affixed to land owned by the grantee.
- The modular is situated on land owned by a third party.
- The modular is located on grantee--owned land but is not permanently affixed.

FIS 6.1

► Which of the statements below best describes the facility?

- The facility is grantee-owned and was not acquired, constructed or renovated using Head Start funds.
- The facility is a modular facility owned by the grantee and was acquired, constructed or renovated using Head Start funds.
- The facility is a non-modular facility owned by the grantee and was acquired, constructed or renovated using Head Start funds.

FIS 6.1

► Can the grantee provide a written Subordination Agreement signed by an ACF official subordinating the Federal interest to the rights of the lender?

FIS 6.1

► Was this loan entered into or refinanced since the last triennial review?

FIS 6.1

► Did the review of the loan agreement find the lender was required to give written and telephonic notice to ACF in the event of a default in payment by the grantee, provide that the lender would not foreclose on the property until at least 60 days after the required notice was sent, and that ACF had the right to cure the default or name another payee?

FIS 6.1

► Can the grantee show ACF approval of a Facilities application under Part 1309?
FIS 6.1

► Provide the following information regarding annual depreciation on the building based on the grantee's financial records and/or audited financial statements:

1. Cost of the building (excluding land)

2. Costs paid from other than Federal Head Start funds

3. Percentage of costs paid from other than Federal Head Start funds

4. Percentage of the building occupied by Head Start

5. Annual depreciation (or use allowance) per financial records and/or audited financial statements

6. Portion of depreciation (or use allowance) attributed to grantee's cost in the facility

7. Land amortization (applies only to grantee-owned land occupied by a facility paid for with Federal funds; amortization is limited to land value divided by useful life of the building)

8. Total depreciation (or use allowance) and land amortization

9. Total annual charge to Head Start (both Federal share and non-Federal share), including "rent," depreciation, use allowance, and mortgage payments

FIS 6.1

► Can the grantee show title insurance for the full appraised value as approved by ACF or the amount of the purchase price, whichever is greater, and contains an endorsement identifying ACF as a loss payee to be reimbursed if the title fails?

FIS 6.1

► Can the grantee show it provided certified copies of the deed, lease, loan instrument, mortgage, and any other legal documents related to the acquisition or major renovation of the facility or the discharge of any debt secured by the facility to the Regional Office after their execution?

FIS 6.1

► Can the grantee produce a current Certificate of Insurance showing a physical-destruction insurance policy that insures the full replacement value of the facility from risk of partial and total physical destruction?

FIS 6.1

► If the facility is located in a flood zone, can the grantee produce a current Certificate of Insurance showing flood insurance covering the full replacement value of the facility?

FIS 6.1

► Is the building subject to a mortgage?

FIS 6.1

► Can the grantee show it recorded a Notice of Federal Interest in the appropriate official records for the jurisdiction in which a facility is located?

FIS 6.1

► For modular units not permanently affixed to land owned by the grantee or affixed to land not owned by the grantee, has the grantee posted the following notice on the modular unit: "On (date), the Department of Health and Human Services (DHHS) awarded (grant number) to (Name of

grantee). The grant provided Federal funds for conduct of a Head Start program, including purchase of this modular unit. The grant incorporated conditions which included restrictions on the use and disposition of this property, and provided for a continuing Federal interest in the property. Specifically, the property may not be used for any purpose other than the purpose for which the facility was funded, without the express written approval of the responsible DHHS official, or sold or transferred to another party without the written permission of the responsible DHHS official. These conditions are in accordance with the statutory provisions set forth in 42 U.S.C. 9839; the regulatory provisions set forth in 45 CFR part 1309, 45 CFR part 74 and 45 CFR part 92; and Administration for Children and Families' grants policy."

FIS 6.1

► For non-modular facilities, is the facility located on land owned by the grantee?

FIS 6.1

► Can the grantee show a land lease or other document ensuring the right of the grantee to have undisturbed use and possession of the facility?

FIS 6.1

► Is the lease filed in the official records of the jurisdiction in which the facility is located?

FIS 6.1

► Does the land lease (or affidavit or other document) include the address and legal description of the property (1309.21(d)(4)(i)), acknowledge that the grant incorporated conditions that included restrictions on the use of the property and provide for a Federal interest in the property (1309.21(d)(4)(ii), and state the property may not be used for any purpose inconsistent with that authorized by the Head Start Act and applicable regulations (1309.21(d)(4)(iii))?

FIS 6.1

► Were non-Head Start funds used in the acquisition, construction or permanent improvement of the facility?

FIS 6.1

► Is the title in the name of the grantee?

FIS 6.1

Leased Facilities—Transaction

► Is there a less-than-arms-length relationship between the lessor and the lessee (e.g., the grantee agency "leasing to the Head Start program", or a property-holding company related to the grantee) or is the lessor listed as a related party on the IRS Form 990 (non-profit only)?

FIS 6.1

► This question is asked to determine whether the lease is considered a capital lease - equivalent to purchase and requiring prior approval under Part 1309.

Does the lease agreement meet any of the following criteria:

• Provide for transfer of the facility to the grantee at the end of the lease term
• Provide the grantee with the option to purchase the facility for less than fair-market value

- Specify that the duration of the lease is equal to 75 percent or more of the estimated economic life of the facility. (Unless specific information is readily available, assume the economic life of the facility is 40 years.)

    FIS 6.1

▶ This question is asked to determine whether the property was subject to a major renovation, which requires prior approval under Part 1309.

Was this facility subject to renovation paid from Head Start funds involving one or more of the following?

- The renovation involved a structural change to the foundation, roof, floor, or exterior or load-bearing walls of a facility or extension of an existing facility to increase its floor area.
- The renovation involved extensive alteration of an existing facility, such as to significantly change its function and purpose, even if such renovation did not include any structural change to the facility.
- The renovation cost is in excess of $250,092 ($200,000 adjusted for inflation since 2003) or 25 percent of the total annual direct costs approved for the grantee by ACF for the budget period in which the application was made.

    FIS 6.1

▶ What is the cost of the building (including any improvements and excluding the cost of land)?

    FIS 6.1

▶ What is the annual depreciation on the building (based on the useful life used for financial-statement or tax purposes) or use allowance (2 percent of the cost of the facility)?

    FIS 6.1

▶ What is the annual charge to the Head Start award [and/or non-Federal share claimed] for the facility?

    FIS 6.1

▶ Did the grantee limit the charge (including claims for non-Federal share) to depreciation or use allowance?

    FIS 6.1

▶ For less-than-arms-length arrangements where charges exceed depreciation or use allowance, can the grantee show that the Regional Office approved an application for the purchase of this facility under Part 1309?

    FIS 6.1

▶ For capital leases, leased property subject to major renovation using Head Start funds, or less-than-arms-length arrangements were charges exceed depreciation or use allowance, is the lease filed in the official records of the jurisdiction in which the facility is located?

    FIS 6.1

▶ For capital leases, leased property subject to major renovation using Head Start funds, or less-than-arms-length arrangements were charges exceed depreciation or use allowance, does the lease (or affidavit or other document filed as Notice of Federal Interest) include the address and legal

description of the property (1309.21(d)(4)(i)), acknowledge that the grant incorporated conditions that included restrictions on the use of the property and provide for a Federal interest in the property (1309.21(d)(4)(iii); and state that the property may not be used for any purpose inconsistent with that authorized by the Head Start Act and applicable regulations (1309.21(d)(4)(iii))?

FIS 6.1

► For major renovation to property not owned by the grantee, does the grantee's lease or other arrangement for occupancy provide the funding agency with the required right to designate a new lessee in the event of default, withdrawal, or termination; protect the Federal interest in the facility; and ensure the grantee's undisturbed use and possession of the facility?

FIS 6.1

► Does the lease (or affidavit or other document filed as Notice of Federal Interest) acknowledge that the grant incorporated conditions that included restrictions on the use of the property, provide for a Federal interest in the property (as described in 1309.21(d)(3)(ii)), and state that the property may not be used for any purpose inconsistent with that authorized by the Head Start Act and applicable regulations (as described in 1309.21(d)(3)(iii))?

FIS 6.1

Loan Review—Transaction

► Did the loan agreement exclude any claims against assets acquired or improved by Head Start funds?

FIS 6.1

► If the loan agreement did not exclude assets having a federal interest from use as collateral, did the grantee receive written approval from the Grants Management Officer (or designee) to encumber the Federal interest?

FIS 6.1

Fiscal Integrity Observation

► Conduct a follow-up (document review, interview, etc.) if concerns were identified by the Regional Office related to the grantee's construction, purchase or major renovation of any facility. Record your answer in detail and provide details on any documents that were provided in response to your question.

FIS 6.1

Targeted Questions—FIS 6.2

Equipment—Transaction

► Is the equipment supported by an entry in the grantee's equipment records including all required information (a description of the property; serial number or other identification number; source of the property; title holder; acquisition date; cost of the property; percentage of Federal participation in the cost of the property; location, use and condition of the property; and ultimate disposition data, including the date of disposal and sales price of the property)?

FIS 6.2

► Can the grantee document that the equipment was part of a physical inventory conducted at least once in the past 2 years?

FIS 6.2

► Can the grantee document that it requested disposition instructions from the Regional Office?

FIS 6.2

► Did the grantee comply with any disposition instructions received from the Regional Office and reimburse HHS for its share in the net proceeds (unless directed otherwise by the Regional Office)?

FIS 6.2

Blank Page

ERSEA Introduction

Eligibility, Recruitment, Selection, Enrollment and Attendance (ERSEA) defines how Head Start programs recruit, select, and enroll children and families. Programs are responsible for assessing their communities and recruiting children and families who are most in need, including families below the poverty line, children with disabilities, families that are homeless, and pregnant women. Programs must have established procedures for verifying eligibility and selecting the children and families to be enrolled in their Head Start programs. Attendance must be monitored and appropriate follow-up conducted with families when attendance issues arise. By monitoring ERSEA, the Office of Head Start (the OHS) is better able to ensure that our country's neediest families and children are recruited and enrolled in an Early Childhood Education program.

Key Indicators of Program Performance

1. Recruitment and Selection

   The program implements practices to ensure eligible children and pregnant women are recruited and given priority for enrollment.

2. Eligibility

   The program verifies eligibility and enrolls children and pregnant women according to Federal regulations.

3. Enrollment

   The program has practices in place to ensure maintenance of funded enrollment and at least 10% of enrollment of children with disabilities.

4. Attendance and Participation

   The program monitors daily attendance for center-based programs and ensures that no child's enrollment, in any program option, is contingent on payment of a fee.

ERSEA

Key Indicator #1—Recruitment and Enrollment
The program implements practices to ensure eligible children and pregnant women are recruited and given priority for enrollment.

Compliance Measures	Federal Regulations
1.1 The program develops and implements a process that is designed to actively recruit families with Head Start- and/or Early Head Start-eligible children, including children with disabilities and pregnant women (if applicable), informing them of available services and encouraging them to apply for admission.	1305.5(a) 1308.5(f) 645A(c)(1)
1.2 Prior to the agency selecting and enrolling children from families whose income falls above 100 percent of the poverty line, the program has established and implemented outreach and enrollment policies and procedures to ensure that it is meeting the needs of the following children: • Children from families with an income below the poverty line • Children from families who are receiving public assistance • Children who are homeless • Children who are in foster care	645(a)(1)(B)(iii)(II)(aa-bb)
1.3 Migrant programs give priority to children from families whose pursuit of agricultural work requires them to relocate most frequently within the previous 2-year period. *Note: Applies to migrant programs only.*	1305.6(b)

Targeted Questions—ERSEA 1.1

ERSEA Coordinator—Interview

► Does the program have an effective system for recruitment that includes the following:

- Defines the recruitment area, establishes recruitment goals, and develops recruitment plans using program data (e.g., Community Assessment, Self-Assessment)
- Conducts outreach within the community
- Ensures recruitment efforts and materials include efforts to reach families with children with severe disabilities
- Ensures EHS program recruitment efforts and materials include efforts to reach pregnant women

ERSEA 1.1

Targeted Questions—ERSEA 1.2

ERSEA Coordinator—Interview

► With the ERSEA Coordinator, review the program's policies and procedures to determine whether the program has selection criteria and practices that ensure the program is prioritizing children for enrollment based on:

- Child age
- Family income/categorical eligibility
- Availability of kindergarten or first grade for the child
- Locally determined priorities

If the ERSEA Coordinator indicates that the program does not have selection criteria, ask the coordinator to explain how children are selected for enrollment.

ERSEA 1.2

► Review the program's documentation related to the selection of children for enrollment, including wait lists and documentation of children who are currently enrolled. Ask the coordinator to walk you through the process of how the program ensures that children who are income- and categorically eligible are enrolled prior to children who are above 100 percent of the poverty guidelines. Describe this process.

ERSEA 1.2

Targeted Questions—ERSEA 1.3

ERSEA Coordinator—Interview

► Ask the ERSEA Coordinator to describe the program's selection process and how it ensures that priority is given to children from families whose pursuit of agricultural work required them to relocate most frequently within the previous 2 years.

Note: Applies to migrant programs only.

ERSEA 1.3

ERSEA

Key Indicator #2—Eligibility
The program verifies eligibility and enrolls children and pregnant women according to Federal regulations.

Compliance Measures	Federal Regulations
2.1 Program staff verified each child's eligibility and included in each file a statement signed by a program employee identifying the child's eligibility category and the documents examined to determine eligibility. *Note: Signed statements may list one of the following acceptable forms of proof of eligibility: individual Income Tax Form 1040; W-2 forms, pay stubs, pay envelopes, or employers' written statements; documentation showing current status as recipients of public assistance; and declarations of zero income. Also, note that homeless children and foster children are categorically eligible.*	1305.4(c-e)
2.2 The program enrolls children who are categorically eligible (who fall within the defined income-eligibility requirements). Defined Eligibility Requirements: • Child's family income is below the poverty line • Child's family is receiving public assistance (SSI and TANF) • Child's family is homeless • Child is a foster child Additional income-eligibility requirements include the following: • Ten percent of children enrolled in the program may be over the income threshold • An additional 35 percent of children who are not categorically eligible may be from families whose income is between 100 and 130 percent of poverty *Note: Being a recipient of Food Stamps does not in and of itself make a child eligible for the Head Start program.* *Note: Does not apply to American Indian or Alaska Native grantees.*	645(a)(1)(B)(iii)(I-II)
2.3 American Indian/Alaska Native programs ensure that the children who meet the following requirements are enrolled before enrolling more than 10 percent over-income children: • Serving all income-eligible children who wish to enroll living on the reservation • Serving all income-eligible children who wish to enroll native to the reservation but living in non-reservation areas • Enrolling all non-American Indian income eligible children whose families wish to enroll if the non-reservation area is not served by another Head Start program *Note: Applies only to AIAN programs*	1305.4(b)(3)(i-iv)

Targeted Questions—ERSEA 2.1

Child File

► Is there a signed statement in the file verifying the child's eligibility?

ERSEA 2.1

► Did the signed statement indicate which documents, in accordance with 1305.4(d), were examined to determine whether the child was eligible to participate in the program?

ERSEA 2.1

► Did the signed statement indicate the eligibility status of the child?

ERSEA 2.1

Targeted Questions—ERSEA 2.2

Child File

► In which eligibility category did the program enroll the child?

- Income Eligible
- Categorically Eligible
- Income Eligible and Categorically Eligible
- Between 100-130% of poverty
- Over-Income (Counted as 10% max/ 49% max for AIAN)
- No eligible category determination made by program

ERSEA 2.2

Targeted Questions—ERSEA 2.3

ERSEA Coordinator—Interview

► Interview the ERSEA Coordinator about the program's enrollment process. Ask him or her to describe the program's enrollment process in detail and provide you with information on how enrollment decisions are made.

Prior to the program enrolling children whose families exceed the low-income guidelines, the AI/AN program must ensure that:

- All children from Indian and non-Indian families living on the reservation that meet the low-income guidelines and who wish to be enrolled in Head Start are served.
- All children from income-eligible Indian families native to the reservation but living in non-reservation areas approved as part of the Tribe's service area, who wish to be enrolled in Head Start are served by the program.

Note: Applies only to AIAN programs
ERSEA 2.3

ERSEA

Key Indicator #3—Enrollment
The program has practices in place to ensure maintenance of funded enrollment and at least 10% of enrollment of children with disabilities.

Compliance Measures	Federal Regulations
3.1 Actual program enrollment is composed at least 10 percent of children with disabilities. *Note: Programs are expected to reach the 10 percent requirement at any point during the program year.* *For reviews occurring between October and January, the program must have reached 10% at any time during the previous program year.* *For reviews occurring between February and September the program must have reached 10% at any time during the current program year.*	1308.5(c)(1-4) 640(d)(1)
3.2 The program enrolled 100% of its funded enrollment and maintained an active and ranked waiting list at all times, with ongoing activities and community outreach to identify underserved populations to ensure that eligible children enter the program as vacancies occur.	1305.6(d) 642(g)
3.3 The program has documentation to support monthly enrollment data submitted to the Office of Head Start.	641A(h)(2)(A-B)

Targeted Questions—ERSEA 3.1

ERSEA Coordinator—Interview

► With the ERSEA Coordinator, review the program's enrollment documentation and ERSEA tracking system to determine the percentage of children enrolled in the program (actual enrollment) with disabilities.

- If the program has a waiver for the 10% disabilities requirement, document the date the waiver was granted and the period for which the waiver was granted.
- If the on-site monitoring review occurs between October and January of the current program year, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the previous program year was at least 10% children with disabilities.
- If the on-site monitoring review occurs between February and September of the current program year, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the current program year is at least 10 % children with disabilities.
- If the program is a migrant program, ask the ERSEA Coordinator to provide enrollment documentation confirming the actual program enrollment for the previous program year was at least 10% children with disabilities.

ERSEA 3.1

Targeted Questions—ERSEA 3.2

ERSEA Coordinator —Interview

► With the ERSEA Coordinator, review the program's waiting list and selection criteria. Determine whether the program maintains an active waiting list at all times on which children are ranked according to the program's selection criteria and whether the program uses the waiting list to fill vacancies as they occur.

Ask the ERSEA Coordinator to describe how the program:

- Develops a waiting list and how it ranks the children who are listed on the waiting list using the selection criteria
- Maintains a waiting list throughout the year, including how vacancies are identified and children are selected to fill vacancies within 30 days
- Conducts ongoing activities and community outreach efforts to identify underserved populations to ensure that eligible children enter the program as vacancies occur

PS 1305.7(b) allows programs to elect not to fill vacancies within 60 calendar days of the end of their program years. If the on-site monitoring review takes place within 60 calendar days of the end of the program year, document the date the program year ends.

Note: If a program is under enrolled, it is not required to maintain a waiting list; however, this does not preclude the program from having selection criteria and a process for the creation of a wait list.
ERSEA 3.2

Targeted Questions—ERSEA 3.3

ERSEA Documents—Document

► Perform a document review of the program's enrollment reports for the last 12 months of operation to determine whether they:

- Were submitted to the ACF Regional Office within 14 days following the end of the previous month
- Accurately match enrollment data maintained by the grantee

Determine whether actual enrollment was less than funded enrollment, how long the shortfall existed, and whether the program submitted in its report to ACF the reason for any existing enrollment shortfall. Document the date the shortfall occurred, the reasons submitted to ACF, and any additional correspondence with ACF.

If there are inaccuracies in reporting, or reasons for under-enrollment have not been submitted to ACF, interview the ERSEA Coordinator to determine why.

ERSEA 3.3

ERSEA

Key Indicator #4—Attendance and Participation

The program monitors daily attendance for center-based programs and ensures that no child's enrollment, in any program option, is contingent on payment of a fee.

Compliance Measures	Federal Regulations
4.1 When monthly average daily attendance in center-based programs falls below 85 percent (except in the case of illness or well-documented absences), the causes of absenteeism are analyzed, and the program initiates appropriate family support as needed. *Note: Applies only to programs with a center-based program option*	1305.8(a-b)
4.2 The program ensures that no child's enrollment or participation in the Head Start program is contingent on payment of a fee. *Note: State subsidies should not be used as a contingency for enrollment or attendance in the Head Start portion of the program.*	1305.9

Targeted Questions—ERSEA 4.1

ERSEA Coordinator—Interview

► With the ERSEA Coordinator, review the program's daily attendance records to determine whether, for children with four or more consecutive unexcused absences, the program made efforts to initiate appropriate family support.

ERSEA 4.1

► With the ERSEA Coordinator, review the program's monthly attendance reports for center-based and FCC classrooms to determine whether the program tracks and records instances when attendance falls below 85% and examines patterns of absences, reasons for absences, and the number of absences that occurred on consecutive days.

For instances when the monthly average attendance fell below 85%, ask the ERSEA Coordinator to describe how the program analyzes the patterns and causes of absenteeism and develops plans for addressing attendance issues.

ERSEA 4.1

Targeted Questions—ERSEA 4.2

Parent—Interview

► Ask parents to state whether the program charges fees in exchange for enrollment or participation in Head Start. Examples may include paying late fees, registration fees, money for field trips, etc.. If parents are required to pay fees, determine the extent to which this affected their ability to participate in the program.

If parents are required to pay fees, verify with the Fiscal Reviewer that these fees are required. Work with the Fiscal Reviewer to collect documentation of the required payments and include them as part of your evidence.

ERSEA 4.2

Child Health & Safety Introduction

Child Health and Safety (CHS) is designed to ensure that all Head Start programs are providing children and families with health and developmental services, implementing and promoting healthy practices and providing safe and supportive environments in which children can learn and grow. The CHS protocol is used to ensure that the program supports children's health development by determining each child's health status, screening children and making referrals as needed. The program's healthy practices and routines, including nutrition and dental services are reviewed through the CHS Protocol. Additionally, the CHS Protocol is used to review the safety of physical environments and transportation services provided by the program. By monitoring CHS, the OHS can be sure that Head Start programs are holistically supporting children's health and development and providing safe learning environments for all children.

Key Indicators of Program Performance

1. Access to Health and Dental Care

   The program establishes each child's health status and provides follow up and referral as required.

2. Screening and Referrals

   The program supports children's healthy development by screening children and making referrals as needed.

3. Safe Physical Environments

   The program ensures physical environments are safe for children, parents, and staff.

4. Healthy Practices and Routines

   The program establishes and maintains healthy practices and routines.

5. Appropriate Group Sizes

   The program ensures children's safety and optimal learning environments by providing appropriate group sizes.

6. Transportation and Supervision

   The program ensures children's safety through effective supervision and safe transportation.

Child Health & Safety

Key Indicator #1—Access to Health and Dental Care
The program establishes each child's health status and provides follow up and referral as required.

Compliance Measures	Federal Regulations
1.1 The program engages parents in obtaining from a health care professional a determination of whether each child is up-to-date on a schedule of primary and preventive health care (including dental) and assists parents in bringing their children up-to-date when necessary and keeping their children up to date as required.	1304.20(a)(1)(ii) 1304.20(a)(1)(ii)(A-B) 1304.20(a)(2)
1.2 The program ensures that each child with a known, observable, or suspected health, dental, or developmental problem receives follow-up and further testing, examination, and treatment from a licensed or certified health care professional. The program also develops and implements a follow-up plan.	1304.20(a)(1)(iii-iv) 1304.20(c)(3)(ii)
1.3 The program involves parents, consulting with them immediately when child health or developmental problems are suspected or identified and informing them immediately in the case of an emergency involving their children.	1304.20(e)(1) 1304.22(a)(4) 1306.35(c)
1.4 The program informs parents of health and developmental procedures, obtains their authorization prior to performing these procedures, maintains written documentation of consent, and explains results.	1304.20(e)(2)
1.5 The program has established procedures for tracking the provision of health services.	1304.20(a)(1)(ii)(C)
1.6 The Early Head Start program helps pregnant women access through referrals early and regular comprehensive pre-natal and post-partum care including, early and continuing risk assessment, health promotion and treatment, and mental health interventions and follow-up, as appropriate. *Note: Applies only to programs serving pregnant women and new mothers*	1304.40(c)(1)(i-iii)
1.7 The program ensures that a health staff member visits each newborn within two weeks after birth to ensure both the mother's and the child's well-being. *Note: Applies only to programs serving pregnant women and new mothers*	1304.40(i)(6)

Targeted Questions—CHS 1.1

Child File

► Has a determination been made by a health care professional as to whether or not the child was up-to-date on a schedule of age-appropriate preventive and primary health care (including EPSDT)?

CHS 1.1

► Did the health care professional determine the child was up-to-date on a schedule of age-appropriate preventive and primary health care (including EPSDT)?

CHS 1.1

► Has the program assisted parents in making arrangements to bring their children up-to-date on a schedule of primary and preventive health care?

CHS 1.1

► On what date was a determination made as to whether the child was up-to-date on a schedule of age-appropriate preventive and primary health care (including EPSDT)?

CHS 1.1

Health Services Coordinator—Interview

► During your interview with the Health Coordinator, determine how the program ensures that children are kept up-to-date on a schedule of age-appropriate preventive and primary health care (including state EPSDT requirements). Is there a process used by the grantee throughout the year? What tasks are involved in this process? How frequently are the tasks carried out? Who is responsible for carrying them out?

For all children who are not up-to-date on the recommended schedule of preventive and primary health care, how does the program assist parents in making arrangements to bring their children up-to-date?

CHS 1.1

► This program has not been open for 90 days (or 30 days for programs operating shorter durations). Based on your file review and the information you gather from this interview question, assess whether the program has a system in place to ensure that health care determinations are made on time.

Interview the Health Coordinator to identify the program's process for ensuring determinations are made as to whether children are up-to-date on a schedule of age-appropriate preventive and primary health care (including state EPSDT requirements) within 90 days of program entry. Ask the Health Coordinator:

- What is the process the program uses to ensure all children have a determination (as to whether they are up-to-date on preventive and primary health care) within 90 days of entry into the program?
- What tasks are involved in this process? How frequently are the tasks carried out? Who is responsible for carrying them out?

- If the program determines that a child is not up-to-date, what steps does the grantee take? Who is responsible for taking these steps?

Note: Applies only to programs that have been in operation for less than 90 days at the time of the on-site review (or 30 days for programs operating shorter durations).
CHS 1.1

Targeted Questions—CHS 1.2

Child File

► Does the child have a known, observable, or suspected health, dental, or developmental problem?
CHS 1.2

► Did the child receive further diagnostic testing, examination, and treatment by an appropriate licensed or certified professional?
CHS 1.2

► Did the child receive follow-up treatment as recommended by the licensed or certified professional? If not, did the program develop or is the program in the process of developing a follow-up plan for the child?
CHS 1.2

Targeted Questions—CHS 1.3

Teacher, FCC Provider—Interview

► Ask how and when staff notify and consult with the parents of children when health and developmental problems are suspected or identified. What are the program's related policies and procedures?

Ask how and when parents are contacted in the case of emergencies involving their children. What are the program's related policies and procedures?
CHS 1.3

Parent-Interview

► Ask the parents you are interviewing whether their child had a suspected or identified health or developmental concern. If so, were they promptly notified by the program? What information did the program provide to them about the health or developmental concern?

Ask the parents you are interviewing whether their children experienced an emergency (e.g., a visit to the emergency room) during program hours. If so, were they notified of the emergency in a prompt and timely manner and who from the program notified them?
CHS 1.3

Health Services Coordinator—Interview

► With the Health Coordinator, review the program's policies and procedures regarding notifying parents in the event of an emergency. Ensure that the policies are adequate and that following the procedures would allow all parents to be contacted in a prompt and timely manner.

Ask the Health Coordinator to pull examples of documentation noting emergencies involving children. Look for how and when parents were notified of the emergencies.

Ask the Health Coordinator to describe the process used by staff to notify parents when they suspect children have health or developmental problems.

CHS 1.3

Home Visitor—Interview

► Ask the home visitor(s) how they discuss with parents the health and developmental concerns they have about children. Ask for some examples of these discussions.

CHS 1.3

FCC Provider—Interview

► Ask the FCC provider to describe the contingency plans for emergencies or unplanned interruptions in service and how parents were involved in developing the plans.

CHS 1.3

FCC Documents—Document

► Perform a document review to determine whether FCC Providers have contingency plans for emergencies or unplanned interruptions in service.

CHS 1.3

Targeted Questions—CHS 1.4

Child File

► Did the child receive health procedures or developmental screenings administered through the program or by contract or agreement?

CHS 1.4

► Did the file contain evidence of parent/guardian consent for health procedures and developmental screenings administered or scheduled through the program?

CHS 1.4

► Was parent/guardian consent obtained prior to any health procedures and developmental screenings being performed?

CHS 1.4

Targeted Questions—CHS 1.5

Tracking System—Document

► Review the program's health tracking system to ensure that it includes all of the necessary information for tracking the health care services provided (i.e., dates, types of screenings, assessments, referrals, results, and outcomes) and that the system is regularly updated. When reviewing the tracking system, determine whether it includes information on all required health services (medical, dental, mental health, and nutrition).

When reviewing the tracking system, confirm that the information in the system is accurate by comparing the data with the information contained in the child files.

CHS 1.5

Targeted Questions—CHS 1.6

Pregnant Women/New Mothers—Interview

► Ask the pregnant women and new mothers how the program has helped them access comprehensive pre-natal and post-partum care that includes:

- Early and continuing risk assessments
- Health promotion and treatment
- Mental health interventions and follow-ups (when needed)

Note: Applies only to program serving pregnant women and new mothers
CHS 1.6

Targeted Questions—CHS 1.7

Health Services Coordinator—Interview

► Ask the Health Coordinator to describe the process the program uses to ensure that newborns and their mothers are visited within two weeks after birth health staff. Who from the program visits the newborn and mother?

Review files of new mothers who have given birth with the Health Coordinator. Look for documentation in the files indicating when visits occurred. Document any visits that occurred more than two weeks after delivery or did not occur at all. If visits occurred later than two weeks after birth or did not occur at all, document the reason they were late or did not occur, including whether the mother refused or delayed the visit.

Note: Applies only to programs serving pregnant women and new mothers.
CHS 1.7

Child Health & Safety

Key Indicator #2—Screening and Referrals

The program supports children's healthy development by screening children and making referrals as needed.

Compliance Measures	Federal Regulations
2.1 The program, in collaboration with each child's parent, performs or obtains the required linguistically and age-appropriate screenings to identify concerns regarding children within 45 calendar days (30 days for programs operating shorter durations) of their entry into the program, obtains guidance on how to use the screening results, and uses multiple sources of information to make appropriate referrals. *Note: 1304.20(a)(2) applies only to grantees or delegates operating programs of shorter durations (less than 90 days) and should be cited in conjunction with 1304.20(b)(1) for such programs.*	1304.20(b)(1-3) 1304.20(a)(2)
2.2 A coordinated screening, assessment, and referral process for all children identifies children suspected of having a disability as soon as the need becomes evident and, in partnership with the LEA (serving children 3-5 years old) and/or Part C agency (serving infants and toddlers), results in timely referrals for further evaluation.	1308.6(a)(1-3) 1308.6(e)(1) 1304.20(f)(2)(ii)
2.3 The program, in partnership with the LEA or Part C agency, works to inform and engage parents in all plans for screenings and referrals for evaluation, including ensuring confidentiality of information and encouraging parent involvement in the IEP and IFSP process.	1304.20(e)(4) 1308.6(c) 1308.19(j)

Targeted Questions—CHS 2.1

Child File

► Were all sensory screenings (vision and hearing) completed?

CHS 2.1

► What was the latest date on which either of the sensory screenings (vision or hearing) was completed?

CHS 2.1

► Did the program make an attempt to complete the sensory screenings for the child within 45 days (30 days for programs operating shorter durations) of the child's date of entry?

CHS 2.1

► Were all screenings for developmental concerns (including motor, language, cognitive, and perceptual skills) completed?

CHS 2.1

► What was the latest date on which any of the screenings for developmental concerns was completed?

CHS 2.1

► Did the program make an attempt to complete the developmental screenings for the child within 45(30 days for programs operating shorter durations) days of the child's date of entry?

CHS 2.1

► Were all screenings for social, emotional, and behavioral concerns completed?

CHS 2.1

► What was the latest date on which any of the screenings for social, emotional, or behavioral concerns was completed?

CHS 2.1

► Did the program make an attempt to complete the social, emotional, and behavioral screenings for the child within 45 days (30 days for programs operating shorter durations) of the child's date of entry?

CHS 2.1

► List the screenings that were completed more than 45 days after the child's entry into the program (30 days for programs operating shorter durations). Indicate the date of each screening and how many days after the 45 (30) day timeframe each screening was completed.

CHS 2.1

Health Services Coordinator—Interview

► Ask the Health Coordinator about the program's screening procedures.

- Have him or her describe with whom the program consults regarding the interpretation of screening findings.
- How does the program's screening process include collecting information from multiple sources?
- How does the program ensure that the screenings conducted are linguistically and age-appropriate and sensitive to each child's cultural background to the greatest extent possible?

CHS 2.1

► This program has not been open for 45 days (or 30 days for programs operating shorter durations). Based on your file review and the information you gather from this interview question, assess whether the program has a system in place to ensure that screenings are completed in a timely manner.

Interview the Health Coordinator to determine whether the program has a process for ensuring that all children receive the required screenings within 45 calendar days of their entry into the program.

- What process does the program use to ensure all children enrolled receive the required screenings within 45 days of entry?
- What tasks are involved in this process? How frequently are the tasks carried out? Who is responsible for carrying them out?
- If the program determines that a child has not received all required screenings, what steps does it take? Who is responsible for taking these steps?

Note: Applies only to programs that have been in operation for less than 45 days at the time of the on-site review

CHS 2.1

Health Policies and Procedures—Document

► Perform a document review of the program's health screening procedures.

Do the screening procedures provide evidence that the program has a screening process that is linguistically and age-appropriate and is sensitive to each child's cultural background to the greatest extent possible? Do the procedures used ensure that information is collected from multiple sources (family members, teachers, and relevant staff)? Do the procedures describe the grantee's process for using guidance from mental health or child development professionals on how to use the findings to address identified needs?

CHS 2.1

Targeted Questions—CHS 2.2

Child File

► Does the child have a suspected or identified disability (Includes children with current IEPs or IFSPs as well as children with screening results that indicate a possible disability or need for an evaluation.)?

CHS 2.2

► Did the Disabilities Coordinator make a prompt referral to the LEA or Part C Agency?

CHS 2.2

Disabilities Coordinator—Interview

► Ask the Disabilities Coordinator about his or her general involvement in the screening, assessment, and referral process for all children. Ask him or her to:

- Describe his or her involvement in the screening process
- Describe his or her involvement in the ongoing developmental assessment process
- Describe his or her involvement in the referral process. What is your process for ensuring that referrals to the LEA or Part C agency are timely?

CHS 2.2

► If the Disabilities Coordinator made referrals to the LEA or Part C agency for specialized evaluation, ask him or her to explain how he or she ascertains the status of the referral.

CHS 2.2

Targeted Questions—CHS 2.3

Parent—Interview

► Interview parents about their involvement in the screening, referral, and evaluation process for their children. The program is required to inform them of all of the following:

- The different types of screenings (should be provided prior to the child receiving the screening)
- Results of screenings

- The purpose of further evaluation (should be provided prior to the child receiving the evaluation)
- Results of the evaluation

If their children were in need of IEPs or IFSPs, ask the parents how the program included them in the process of developing the IEPs or IFSPs.

CHS 2.3

Child Health & Safety

Key Indicator #3—Safe Physical Environments

The program ensures physical environments are safe for children, parents, and staff.

Compliance Measures	Federal Regulations
3.1 Facilities used for center-based program options, home-based group socialization activities, or Family Child Care comply with State and local licensing requirements.	1306.30(c) 1306.35(d)
3.2 The program ensures that sufficient equipment, toys, materials, and furniture are provided, and are age-appropriate, safe, and supportive of the abilities and developmental level of each child.	1304.53(b)(1) 1304.53(b)(1)(iii)
3.3 Precautions are taken to ensure the safety of children.	1304.22(a)(3) 1304.53(a)(10)(iv-vii) 1306.35(b)(2)(ii-vi) 1306.35(b)(2)(ix)
3.4 The program ensures that medication is properly stored and is not accessible to children.	1304.22(c)(1)
3.5 The program ensures that no hazards are present around children.	1304.53(a)(8) 1304.53(a)(10)(i) 1304.53(a)(10)(x-xii) 1304.53(a)(10)(xiv) 1304.53(a)(10)(xvi) 1306.35(b)(2)(i) 1306.35(b)(2)(vii-viii)
3.6 The program ensures that sleeping arrangements for infants do not use soft bedding materials. *Note: Applies only to programs serving infants and toddlers*	1304.53(b)(3)
3.7 All infant and toddler toys are made of non-toxic materials and sanitized regularly. *Note: Applies only to programs serving infants and toddlers*	1304.53(b)(2)
3.8 The program has adequate usable indoor and outdoor space.	1304.53(a)(5) 1306.35(a)(3)
3.9 Outdoor play areas at center-based programs are arranged to prevent children from getting into unsafe and/or unsupervised areas. The program also ensures that children en route to play areas are not exposed to vehicular traffic without supervision. *Note: Applies only to programs with a center-based program option*	1304.53(a)(9)
3.10 The program ensures that facilities, materials, and equipment are well maintained, clean, and in good repair.	1304.53(a)(7) 1304.53(a)(10)(viii)
3.11 The program's facilities are adequate for children with disabilities, ensuring safety, comfort, and opportunities for participation.	1304.53(a)(10)(xvii)

Targeted Questions—CHS 3.1

Licensing Documents—Document

▶ Do state or local licensing requirements apply to any of this program's facilities?

CHS 3.1

▶ Review the licenses for all of the Head Start/Early Head Start facilities. Ask the program for a list of all facilities used and compare the list with the licensing documents.

Ensure that the program has a current license for all of its Head Start/Early Head Start facilities that are used for center-based, combination program option classroom activities, home-based group socialization activities, and Family Child Care. Make sure to indicate in your notes the number and types of settings without required licenses, as well as the names of the center(s), if applicable.

CHS 3.1

Targeted Questions—CHS 3.2

Safety Observation—Center-Based Classroom and FCC

▶ Are toys, materials, and furniture age-appropriate, safe, and supportive of the abilities and developmental level of each child served, with adaptations, if necessary, for children with disabilities?

CHS 3.2

▶ Does the program provide sufficient equipment, toys, materials, and furniture (including diapers and wipes) to meet the needs and facilitate the participation of children and adults?

CHS 3.2

Parent—Interview

▶ Interview parents to determine whether the program requires them to provide items such as equipment, toys, materials (including diapers and wipes), and furniture. Have parents experienced instances when the program has asked them to provide items or supplies? If yes, please ask parents to describe the types of items and supplies.

CHS 3.2

Targeted Questions—CHS 3.3

Safety Observations—FCC

▶ Are functioning smoke and carbon monoxide detectors installed and properly located?

CHS 3.3

▶ If the Family Child Care home has a basement, and local health officials recommend radon detectors, are radon detectors installed?

CHS 3.3

► Is there a system of supervision in place that ensures the safety of children not within view for any period?

CHS 3.3

► Does the provider ensure the safety of children when a body of water, road, or other potential hazard is present, or when children are being transported?

CHS 3.3

► Is there a fence to prevent children's unsupervised access to water hazards, such as swimming pools or other bodies of water?

CHS 3.3

► Did the provider secure health certificates for pets to document they have up-to-date immunizations and are free from conditions that may pose a threat to children's health?

CHS 3.3

► Does the provider ensure that pets are managed appropriately to ensure children's safety at all times?

CHS 3.3

Safety Observation—Center-Based Classroom

► Are emergency evacuation routes and other safety procedures (e.g., for fire- or weather-related emergencies) posted in the classroom?

CHS 3.3

► Is lighting sufficient and adequate for classroom activities?

CHS 3.3

► Is adequate emergency lighting available in case of a power failure?

CHS 3.3

► Is a fire extinguisher available that is easily accessible and is there a service date on the fire extinguisher showing that it has been updated at least annually?

CHS 3.3

► Are an appropriate number of smoke detectors installed and is there documentation showing that the smoke detectors are tested regularly?

CHS 3.3

► Are exits clearly visible and evacuation routes clearly marked and posted so that the path to safety outside is unmistakable?

CHS 3.3

Targeted Questions—CHS 3.4

Safety Observation—Center-Based Classroom and FCC

► Are medications labeled and stored under lock and key and refrigerated if necessary?

CHS 3.4

Health Services Coordinator—Interview

► With the Health Coordinator, review the program's current policies and procedures regarding the labeling and storage of medications. Determine whether the written procedures include procedures for the labeling and storage of medications for children, staff and volunteers, under lock and key, and refrigerating if necessary.

CHS 3.4

Targeted Questions—CHS 3.5

Safety Observation—FCC

► Are children safe from the potential hazards posed by appliances (stove, refrigerator, microwave, etc.), such as appliances with frayed wires, hot stoves, and refrigerator coils?

CHS 3.5

► Are the premises free from pests?

CHS 3.5

► If needed, are chemicals for controlling pests used while children are not on premises?

CHS 3.5

► Are firearms or other weapons inaccessible or kept in areas not occupied by children?

CHS 3.5

► Does the provider ensure that alcohol and drugs are not consumed while children are present?

CHS 3.5

► Does the provider ensure that alcohol and drugs are inaccessible to children at all times?

CHS 3.5

Safety Observation—Center-Based Classroom

► Are electrical outlets that are accessible to children designed to prevent shock through the use of covers, installation of child-protection outlets, or the use of safety plugs?

CHS 3.5

► Are windows and glass doors constructed, adapted, and adjusted to prevent injury to children?

CHS 3.5

► Are toilets and hand washing facilities adequate, clean, in good repair, and easily reached by children?

CHS 3.5

► Are toileting and diapering areas separated from areas used for cooking, eating, and children's activities?

CHS 3.5

► Are garbage and trash stored in a safe and sanitary manner?

CHS 3.5

Safety Observation--Center

► Is there a safe and effective heating and cooling system that is insulated to protect children and staff from potential injuries?

CHS 3.5

► Does the design of the playground and selection and layout of playground equipment and/or surfaces minimize the possibility of injury to children?

CHS 3.5

► Is all sewage and liquid waste disposed of properly?

CHS 3.5

► Is the center free of air pollutants, including smoke, lead, pesticides, and herbicides, as well as soil and water pollutants?

CHS 3.5

► If there is spraying of pesticides or herbicides, does the program ensure that no children are present during the spraying and that children do not return to the affected area until it is safe?

CHS 3.5

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

CHS 3.5

Targeted Questions—CHS 3.6

Safety Observation—Center-Based Classroom and FCC

► Does the program ensure that sleeping arrangements for infants (e.g., cribs, playpens, bassinettes) are free of soft bedding materials (e.g., soft mattress, pillows, stuffed animals, fluffy blankets, comforters)?

Note: Applies only to programs serving infants and toddlers
CHS 3.6

Targeted Questions—CHS 3.7

Safety Observation—Center-Based Classroom and FCC

▶ Do all toys appear to be cleaned and sanitized?

Note: Applies only to programs serving infants and toddlers
CHS 3.7

▶ If available, review the toy-sanitizing schedule for the classroom. Is the schedule sufficient to ensure toys are sanitized regularly?

Note: Applies only to programs serving infants and toddlers
CHS 3.7

Targeted Questions—CHS 3.8

Safety Observation—Center-Based Classroom and FCC

▶ Does the classroom provide at least 35 square feet of usable indoor space per child (excluding bathrooms, halls, kitchens, staff rooms, and storage space)?

CHS 3.8

▶ Does the Family Child Care home have sufficient indoor and outdoor space that is usable by and available to children?

CHS 3.8

Safety Observation—Center

▶ Does the center provide at least 75 square feet of usable outdoor space per child for each group using the playground?

CHS 3.8

Targeted Questions—CHS 3.9

Safety Observation—Center and FCC

▶ Are outdoor play areas arranged to prevent children from leaving the premises and getting into unsafe and unsupervised areas?

CHS 3.9

▶ Did you observe any instances when children left an outdoor play area and were able to access unsafe or unsupervised areas or when children were exposed to vehicular traffic without supervision en route to play areas at one or more centers?

CHS 3.9

Targeted Questions—CHS 3.10

Safety Observation—Center

► Were the sites' facilities, materials, and equipment well maintained and in good repair?

CHS 3.10

► Are indoor and outdoor premises cleaned daily and kept free of undesirable and hazardous materials and conditions?

CHS 3.10

Targeted Questions—CHS 3.11

Safety Observation—Center-Based Classroom and FCC

► Were provisions made to ensure the safety, comfort and participation of children with disabilities?

CHS 3.11

Child Health & Safety

Key Indicator #4—Healthy Practices and Routines
The program establishes and maintains healthy practices and routines.

Compliance Measures	Federal Regulations
4.1 Staff, volunteers, and children wash their hands with soap and running water.	1304.22(e)(1)(i-iv)
4.2 Spilled bodily fluids are cleaned up and disinfected immediately according to professionally established guidelines. Tools and equipment used to clean spills are disinfected promptly, and blood-contaminated materials are disposed of in a plastic bag with a secure tie.	1304.22(e)(3-4)
4.3 The program adopts sanitation and hygiene practices for diapering that adequately protect children's and staff's health and safety.	1304.22(e)(5)
4.4 The program obtains information from parents about their children's health and safety needs, identifies and plans for accommodations, and ensures that appropriate staff are informed and trained in accordance with the program's confidentiality policy.	1304.22(b)(3)
4.5 The program's nutrition program is designed and implemented to meet the nutritional needs and feeding requirements of each child (including children with special medical or disability needs).	1304.23(b)(1)
4.6 Meal and snack periods are appropriately scheduled and adjusted to meet the individual needs of children and to feed infants and toddlers "on demand." *Note: Applies only to programs with a center-based or family child care option*	1304.23(b)(1)(vii)
4.7 The program ensures that facilities are available for proper refrigerated storage and handling of breast milk and formula. *Note: Applies only to programs serving infants and toddlers*	1304.23(e)(2)
4.8 Effective dental hygiene is promoted among children.	1304.23(b)(3)

Targeted Questions—CHS 4.1

Safety Observation—Center-Based Classroom and FCC

► If you observed any situation where handwashing was necessary (e.g., after diapering or toilet use, before food preparation, whenever hands are contaminated with blood or other bodily fluids, and after handling pets or other animals), did volunteers, staff, and children wash their hands with soap and running water?

CHS 4.1

Teacher, FCC Provider—Interview

► Ask teaching staff to describe proper handwashing techniques. When should handwashing occur during the program day among both staff and children?

CHS 4.1

Targeted Questions—CHS 4.2

Safety Observation—Center-Based Classroom and FCC

► If you observed staff coming in contact with spills of bodily fluids (e.g., urine, feces, blood, saliva, nasal discharge, eye discharge, or any fluid discharge), were nonporous (e.g., latex) gloves worn by staff? Also, was the spill cleaned up immediately and all exposed areas cleaned and sanitized?

CHS 4.2

Targeted Questions—CHS 4.3

Safety Observation—Center-Based Classroom and FCC

► If you observed diapering during your observation, did staff practice proper sanitation and hygiene procedures for diapering?

CHS 4.3

Health Services Coordinator—Interview

► Review the program's policies and procedures regarding diaper changing with the Health Coordinator. Determine whether the sanitization and hygiene procedures for diapering protect the health and safety of children (e.g., changing areas are sanitized, soiled diapers are properly disposed of, both staff's and children's hands are washed).

CHS 4.3

Teacher, Home Visitor and FCC Provider—Interview

► Ask staff to describe their diaper-changing procedures. Determine whether the sanitization and hygiene procedures for diapering protect the health and safety of children (e.g., changing areas are sanitized, soiled diapers are properly disposed of, both staff's and children's hands are washed).

CHS 4.3

Targeted Questions—CHS 4.4

Parent—Interview

► Ask parents whether the program has asked them to provide information about their children's health and safety needs. If so, ask them to describe their experience sharing this information with the program. What type of information did they share?

CHS 4.4

Teacher, Home Visitor and FCC Provider—Interview

► Determine how the program ensures that teaching staff are informed (and trained as needed) on identifying and planning for needed accommodations. Ask for specific examples of accommodations that have been made.

Find out how the program shares information with staff about children in their settings and whether the provided information allows them to accommodate the children's individual needs.

CHS 4.4

Health Coordinator—Interview

► Determine how the program ensures that staff are informed (and trained as needed) on identifying and planning for needed accommodations. Ask for examples of how the program shared information with staff and parents and how the information helps staff accommodate individual needs. Ask the Health Coordinator to provide examples of some of the accommodations that were needed.

CHS 4.4

Targeted Questions—CHS 4.5

Nutrition Coordinator—Interview

► Determine how the program:

- Meets the nutritional needs and feeding requirements of all children (including current USDA recommendations)
- Addresses special dietary needs/requirements
- Accommodates the feeding and nutritional needs of children with disabilities
- Considers cultural and ethnic preferences when creating menus
- Serves a variety of food that broadens the children's food experience

Note: Applies only to programs with a center-based or family child care option
CHS 4.5

Targeted Questions—CHS 4.6

Nutrition Coordinator—Interview

► Determine how the program schedules meal and snack times and whether they are designed to support individual needs of children, including adjusting schedules where necessary (e.g., for a child who arrives late). How does the program ensure that infants are fed on demand to the extent possible or at appropriate intervals?

CHS 4.6

Targeted Questions—CHS 4.7

Safety Observation—Center-Based Classroom and FCC

► Are facilities available for the proper storage and handling of breast milk and formula?

Note: Applies only to programs serving infants and toddlers
CHS 4.7

Targeted Questions—CHS 4.8

Health Services Coordinator—Interview

► Review the program's policies and procedures regarding dental hygiene for all children with the Health Coordinator. Determine whether children are provided opportunities to brush their teeth or have their gums wiped at least once daily. Determine whether the children one year or older have their teeth brushed or gums wiped in conjunction with meals or feedings.

CHS 4.8

Teacher, FCC Provider—Interview

► Ask staff to explain the dental routines they use with children. Determine whether children are provided opportunities to brush their teeth or have their gums wiped at least once daily. Determine whether the children 1 year or older have their teeth brushed or gums wiped in conjunction with meals or feedings.

CHS 4.8

Child Health & Safety

Key Indicator #5—Appropriate Group Sizes
The program ensures children's safety and optimal learning environments by providing appropriate group sizes

Compliance Measures	Federal Regulations
5.1 The program ensures appropriate class and group sizes based on the predominant age of the children. *Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes are more stringent than the Head Start requirement, the State, local, or Tribal regulations must apply.* *Note: Applies to center-based programs serving preschool-age children* *Note: Applies to Family Child Care program option*	1306.20(g)(1-2) 1306.32(a)(2-6)
5.2 The program ensures that no more than eight children are placed in an infant and toddler space, and no more than four children are assigned to each teacher. *Note: If State, local, or Tribal regulations specify staff-to-child ratios and group sizes are more stringent than the Head Start requirement, the State, local, or Tribal regulations must apply.* *Note: Applies only to center-based programs serving infants and toddlers*	1304.52(g)(4)

Targeted Questions—CHS 5.1

Safety Observation—Preschool Center-Based Classroom

► What is the predominant age of children in the class?

CHS 5.1

► How many children are present in the classroom?

CHS 5.1

Safety Observation—FCC

► What age does the FCC provider serve?

CHS 5.1

► How many children are present in the group?

CHS 5.1

► Is there an assistant present?

CHS 5.1

► How many children under two years of age are present?

CHS 5.1

► How many children under 18 months of age are present?

CHS 5.1

Targeted Questions—CHS 5.2

Safety Observation—Infant/Toddler Center-based Classroom

► How many infants/toddlers are present in the group?

CHS 5.2

► How many teachers are present in the group?

CHS 5.2

Child Health & Safety

Key Indicator #6—Transportation and Supervision

The program ensures children's safety through effective supervision and safe transportation.

Compliance Measures	Federal Regulations
6.1 The program's vehicles are properly equipped. *Note: Applies only to programs providing Transportation services*	1310.10(d)(1-4) 1310.12(b)(1-2)
6.2 At least one bus monitor is aboard the vehicle at all times. *Note: An approval letter from ACF is required for an exception to this regulation.* *Note: Applies only to programs providing Transportation services*	1310.15(c)
6.3 Children are released only to a parent, legal guardian, or other individual as designated in writing by the parent or legal guardian. The agency maintains lists of these persons, including alternates in case of emergency, and up-to-date child rosters at all times to ensure that no child is left behind either at the classroom or on the vehicle at the end of the route.	1310.10(g)
6.4 Each bus monitor, before duty, has been trained on child boarding-and-exiting procedures, use of child restraint systems, required paperwork, emergency response and evacuation procedures, use of special equipment, child pick-up and release procedures, and pre- and post-trip vehicle checks. *Note: This requirement does not apply to programs with a waiver approved by the Administration for Children and Families (ACF) of this requirement. An approval letter from ACF is required for exception to this regulation.* *Note: Applies only to programs providing Transportation services*	1310.17(f)(2)
6.5 The program ensures that persons employed to drive vehicles receive the required behind-the-wheel and classroom training before transporting children. *Note: This Compliance Measure applies to both hired and contracted bus drivers.* *Note: Applies only to programs providing Transportation services*	1310.17(b)(1-7)
6.6 The specific types of transportation assistance offered are made clear to all prospective families in the program's recruitment announcements. The agency also provides reasonable assistance to families to arrange transportation to and from its activities, if transportation services are not provided for all or a portion of the children.	1310.10(b)

Targeted Questions—CHS 6.1

Bus Inspection

► Is the bus equipped with a two-way communication system?

CHS 6.1

► Is the bus equipped with safety equipment for use in an emergency, including a charged fire extinguisher that is properly mounted near the driver's seat and a sign indicating its location?

CHS 6.1

► Is the bus equipped with a first aid kit and a sign indicating its location?

CHS 6.1

► Is the bus equipped with a seat belt cutter for use in an emergency evacuation and a sign indicating its location?

CHS 6.1

► Is the bus equipped for use of height- and weight-appropriate child restraint systems?

CHS 6.1

► Is the bus equipped with a reverse beeper?

CHS 6.1

Targeted Questions—CHS 6.2

Transportation Services Coordinator—Interview

► Ask the Coordinator to describe the process for assigning bus monitors.

- How many bus monitors are assigned to each route? What information is considered when making assignments?
- How do bus monitors support the safe transportation for children with special needs? Are there times when more than one bus monitor is required? If yes, describe under what circumstances this might occur.

Note: Applies only to programs providing Transportation services
CHS 6.2

Targeted Questions—CHS 6.3

Bus Driver—Interview

► Ask the bus driver(s) to describe the process in place to ensure that children are released only to parents or legal guardians, and if children are released to another individual, the parent or guardian has provided permission in writing. Ask them how they ensure the contact information and roster they have are current.

Ask the bus driver(s) to describe the process in place to ensure children are not left behind in a classroom or on a vehicle. Inquire whether a child has ever been left behind. If yes, document the details and follow-up actions that were taken.

CHS 6.3

Transportation Services Coordinator—Interview

► With the Transportation Coordinator, review the program's procedures regarding the release of children and emergency contact with parents and guardians. Where is this information kept? What process is in place to keep this information and the roster up-to-date?

Ask the Transportation Coordinator to discuss the procedures in place to ensure children are not left behind in a classroom or on a vehicle. Inquire whether a child has ever been left behind. If yes, document the details and follow-up actions that were taken.

CHS 6.3

Teacher—Interview

► Ask teacher(s) to describe the process in place to ensure that children are released only to parents or legal guardians, and if children are released to another individual, the parent or guardian has provided permission in writing. Ask them how they ensure the contact information they have is current.

Ask teacher(s) to describe the process in place to ensure children are not left behind in a classroom or on a vehicle. Inquire whether a child has ever been left behind. If yes, document the details and follow-up actions that were taken.
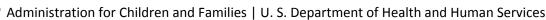
CHS 6.3

Targeted Questions—CHS 6.4

Transportation Services Coordinator—Interview

► Review the program's documentation of training for bus monitors, including topics and date(s) training was received, with the Transportation Coordinator. Training topics should include:

- Child boarding-and-exiting procedures
- Use of child restraint systems (Note, lap belts are not appropriate)
- Required paperwork
- Emergency and evacuation procedures
- Use of special equipment
- Child pick-up and release procedures
- Pre- and post-trip vehicle checks

Confirm that bus monitors are not scheduled for duty until required training is completed. If this is not the case, ask the Transportation Coordinator to describe why this occurred and document the date(s) of the training and the date(s) bus monitors were scheduled.

CHS 6.4

Targeted Questions—CHS 6.5

Transportation Services Coordinator—Interview

► Ask the Transportation Coordinator to describe the training plan for staff employed to drive vehicles. Determine whether the training includes a combination of classroom and behind-the-wheel instruction sufficient to enable each driver to do all of the following:

- Operate the vehicle in a safe and efficient manner
- Safely run a fixed route, including loading and unloading children, stopping at railroad crossings, and performing other specialized driving maneuvers
- Administer basic first aid in case of injury
- Handle emergency situations, including vehicle evacuation procedures
- Operate any special equipment, such as wheelchair lifts, assistive devices, or special occupant restraints
- Conduct routine maintenance and safety checks of the vehicle
- Maintain accurate records as necessary

With the Transportation Coordinator, review the program's documentation of training of staff employed to drive vehicles, including the training topics and the date(s) training was received.

Ask the Transportation Coordinator when staff are scheduled to transport children relative to their training date(s). Confirm that staff are not scheduled to transport children until the required training is completed. If this is not the case, ask the Transportation Coordinator to describe why this occurred. Document the dates bus drivers began transporting children and the dates of their training.

CHS 6.5

Targeted Questions—CHS 6.6

Parent—Interview

► Interview parents to determine how the program provides reasonable assistance to families to ensure children have transportation to and from program activities.

If parents mention any transportation challenges, ask them to describe the challenges and how the program worked or did not work with the family to overcome any transportation-related challenges to their children's attendance at program activities.

CHS 6.6

FCE Coordinator—Interview

► Ask the FCE Coordinator to describe the processes the program has in place to ensure that children have transportation to attend program activities.

Ask the FCE Coordinator for the program's recruitment materials that describe the types of transportation assistance available to families. If necessary, are these materials translated into the preferred languages of prospective families to enable them to clearly understand the information?

CHS 6.6

Blank Page

Family & Community Engagement Introduction

Family and Community Engagement (FCE) analyzes a Head Start program's family and community partnerships by examining the ways families are engaged in goal-setting, accessing services that meet their needs, and leadership opportunities that advance the overall design and implementation of the program. Head Start programs are responsible for facilitating and seeking the engagement of parents of participating children in activities designed to help parents become full partners in the education of their children, especially through family literacy services and parenting skills training that support the parent-child relationship. Programs are also responsible for engaging the community through local volunteerism and other activities that support the sustainability and reach of the Head Start program. By monitoring FCE, the Office of Head Start (the OHS) is better able to ensure that programs achieve the goals of engaging families and communities to support families and boost children's school readiness.

Key Indicators of Program Performance

1. Partnerships with Families

    The program builds ongoing, respectful, and goal-oriented partnerships with families.

2. Parent-Child Relationships

    The program promotes positive parent-child relationships.

3. Parents as Their Child's Educators

    The program supports parents as their children's life-long educators.

4. Parents in Transitions

    The program engages families in the transition process.

5. Community Partnerships

    The program establishes community partnerships that support services to children and families.

Family & Community Engagement

Key Indicator #1—Partnerships with Families
The program builds ongoing, respectful, and goal-oriented partnerships with families.

Compliance Measures	*Federal Regulations*
1.1 The program is open to parents during all program hours, welcoming them as visitors and encouraging them to observe their children as often as possible. Participation in program activities is voluntary and not required as a condition of a child's enrollment.	1304.40(d)(2)
1.2 Program staff demonstrate respect for each family's cultural, ethnic, and linguistic diversity, in all meetings and interactions.	1304.40(a)(5)
1.3 Program staff engage in a process of strengths-based collaborative partnership-building with all parents to establish mutual trust and identify family goals, strengths, and necessary services and other supports. The process begins as early after enrollment as possible, and must take into consideration each family's readiness and willingness to participate.	1304.40(a)(1)
1.4 The program works collaboratively with families to provide, directly or through referrals, resources and services that are responsive to families' needs, goals, and interests and conducts follow-up to determine the effectiveness of services received.	1304.40(b)(1) 1304.40(b)(2)

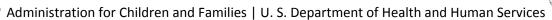### Targeted Questions—FCE 1.1

FCC Provider, Teacher—Interview

► Determine how the program welcomes parents at all times and encourages them to observe their children as often as possible in the program setting. Ask them whether there are any program activities that are not voluntary and where parent participation is required as a condition of a child's enrollment.

FCE 1.1

Parent—Interview

► Determine how the program welcomes them at all times, whether they are encouraged to observe their children as often as possible, and whether there is a requirement that they participate in program activities as a condition of their children's enrollment.

FCE 1.1

Targeted Questions—FCE 1.2

Parent—Interview

► Determine how the program demonstrates respect for each family's diversity, including linguistic, cultural, and ethnic backgrounds and ensures that language does not create any barriers to parents' and families' full participation in program activities.

For parents whose primary language is not English, ask them how the program makes sure that there is a regular staff or contact person available who speaks their language.

FCE 1.2

FCE Staff—Interview

► Determine how they learn about each family's diversity and cultural, linguistic, and ethnic backgrounds. Ask them to provide examples of how they use this information to build relationships with families and demonstrate respect for their cultural, linguistic, and ethnic backgrounds.

FCE 1.2

Targeted Questions—FCE 1.3

FCE Coordinator—Interview

► Ask the FCE Coordinator to describe the process used by the program to engage parents in a strengths-based collaborative partnership-building process. Ask the coordinator how staff perform the following:

- Seek to establish mutual trust with parents
- Help parents identify family goals, strengths, and necessary services and other supports
- Begin the family partnership process as early after enrollment as possible

Document information on whether the partnership process takes place throughout the year and how the program tracks/documents staff attempts and family participation.

Note: A Family Partnership Agreement is not merely a form; it is the process through which programs support families in Head Start. Thus, it is an interactive experience that happens over time and can include many different types of interactions. This process is not a one-time "event," such as a formal meeting; it should begin as early in the year as possible, considering the family's willingness and readiness to participate.

FCE 1.3

Parent—Interview

► Ask parents to describe the opportunities the program provides to parents and families regarding the following:

- Identification of their strengths and needs
- Creation and implementation of individualized goals for their families
- Identification of services and supports needed to meet goals

Ask them when they were offered this opportunity in order to determine whether the program initiated the process of family goal-setting soon after enrollment. Determine whether the program has made a one-time effort to help the family set goals or whether the efforts have been ongoing.

FCE 1.3

Targeted Questions—FCE 1.4

FCE Coordinator—Interview

► Determine the process used by the program to assist parents, either directly or through referrals, in obtaining resources and services that are responsive to families' identified needs, goals, or interests and how it ensures these resources have met the families' needs.

Ask the coordinator to describe the process in place for follow-up to determine whether referrals and/or resources provided were effective.

FCE 1.4

FCE Staff—Interview

► Ask FCE staff to provide examples of how they have helped parents identify and access resources to support families' needs, goals, and interests.

FCE 1.4

► How do program staff follow up to make sure that the resources or services provided were effective? How do they handle situations when services may not have been effective?

FCE 1.4

Parent—Interview

► Determine how the program has assisted parents, either directly or through referrals, in obtaining resources and services to meet their needs, goals, and interests.

FCE 1.4

► Ask parents about their satisfaction with the resources and services provided through referrals outside of the program and how the program follows up with them to ensure their expectations are met. Note any instances in which the program has not effectively followed up.

FCE 1.4

► Determine how satisfied parents are with the resources and services provided by the program in response to families' needs, goals, and interests.

FCE 1.4

Family Services—Document

► With the program staff, review the documents used to track family services. Determine whether there is evidence of:

• The program working collaboratively with the parents to identify and continually access services and resources
• The program following up with the families to determine whether the kind, quality, and timeliness of services received through referrals, when necessary, met the families' expectations and circumstances.

FCE 1.4

Family & Community Engagement

Key Indicator #2—Parent-Child Relationships
The program promotes positive parent-child relationships.

Compliance Measures	Federal Regulations
2.1 The program provides opportunities for parents to enhance their parenting skills, knowledge, and understanding of the educational and developmental needs and activities of their children and share concerns about their children with program staff.	1304.40(e)(2-3)
2.2 Program staff share observations with parents regarding their children's behavior and development and encourage parents to share concerns and observations about their children's mental health, identify appropriate responses to their children's behavior, and discuss how to strengthen and nurture supportive environments and relationships in the home and at the program.	1304.24(a)(1)(i-iv)
2.3 The program makes provisions for mental health program services that include on-site mental health consultation involving the mental health professional, program staff, and parents on how to promote children's mental wellness, including group and individual staff and parent education on mental health issues.	1304.24(a)(3)(ii)

Targeted Questions—FCE 2.1

Parent—Interview

► Determine how the program ensures that parents have an opportunity to enhance their parenting skills and understand their children's educational and overall developmental needs and activities. Ask the following questions:

- What types of information have they received about their children's developmental strengths or opportunities?
- Do they have an opportunity to partner with staff in developing goals for their children?
- How does the program share information about their children's progress?
- Are they provided opportunities to share concerns about their children's development?
- What information has the program shared about how they, as parents, can help promote their children's success as they get ready to enter school?

FCE 2.1

FCE Staff—Interview

► Determine how the program ensures that parents have an opportunity to enhance their parenting skills and foster the growth and development of their children. Ask the staff to describe how the program provides opportunities for developing parenting skills and knowledge in the following areas:

- Expectant parenting and pre-natal health (as applicable)
- Strategies to support their children's development, including development of individual child goals and strategies for preparing their children for school

- Ensuring the health and safety of their children
- Providing input and sharing concerns regarding their children

FCE 2.1

Teacher, FCC Provider, Home Visitor—Interview

► Determine how the program ensures that parents have an opportunity to enhance their parenting skills and foster the growth and development of their children. Ask the staff to describe how the program provides opportunities for developing parenting skills and knowledge in the following areas:

- Expectant parenting and prenatal health (as applicable)
- Strategies to support their children's development, including the development of individual child goals and strategies for preparing their children for school
- Ensuring the health and safety of their children
- Providing input and sharing concerns regarding their children

FCE 2.1

Targeted Questions—FCE 2.2

Parent—Interview

► Determine how parents are encouraged to share their concerns and are supported in understanding appropriate responses to their children's behaviors to support their children's mental health. Ask parents for examples of:

- How program staff share observations of their children's behavior
- How they are encouraged to share observations about their children's behavior
- Strategies program staff have shared to help them develop nurturing, supportive relationships and environments for their children, both in the home and in the program

FCE 2.2

Mental Health Services Coordinator—Interview

► Ask the Mental Health Services Coordinator about the types of training and materials that are shared with parents. Collect information about how the mental health professional and/or staff share observations with parents, discuss concerns, and provide information for parents related to mental health and children's behaviors.

FCE 2.2

Teacher, FCC Provider, Home Visitor—Interview

► Determine how ECD Staff actively share information and observations of children's behavior with parents. Ask ECD staff to describe how mental health observations, information, and concerns are shared with parents and how parents have an opportunity to share their own observations and concerns.

FCE 2.2

Targeted Questions—FCE 2.3

Parent—Interview

► Ask parents to describe how program staff share information and educational resources regarding children's mental health and wellness. Determine whether they have access to the Mental Health Consultant.

Educational resources on mental health should be provided to groups and individuals as needed. Focus on the type and quality of services and information provided to individual or groups of parents.

FCE 2.3

Mental Health Services Coordinator—Interview

► Determine what types of educational resources related to mental health issues are provided to staff and parents by the program. Ask how the mental health professional is involved and whether consultation is provided on-site.

FCE 2.3

Family & Community Engagement

Key Indicator #3—Parents as Their Child's Educators

The program supports parents as their children's life-long educators.

Compliance Measures	Federal Regulations
3.1 Program teaching staff plan, schedule, and facilitate no fewer than two staff-parent conferences and no fewer than two home visits per program year to discuss each child's development and progress. *Note: Applies only to programs with a center-based program option*	1304.40(i)(2) 1304.40(e)(5)
3.2 The program encourages parents to be full partners in the education of their children.	642(b)(3)(A) 642(f)(10)
3.3 Programs provide opportunities for children and families to participate in literacy services by increasing family access to materials, services, and activities critical to family literacy development. *Note: The term "family literacy services" means services that are of sufficient intensity in terms of hours, and of sufficient duration to make sustainable changes in a family and that integrate all of the following activities: (A) Interactive literacy activities between parents and their children (B) Training for parents regarding how to be the primary teachers for their children and full partners in the education of their children (C) Parent literacy training that leads to economic self-sufficiency and financial literacy (D) An age-appropriate education to prepare children for success in school and life experiences*	1304.40(e)(4)(i)
3.4 The program builds parents' confidence to advocate for their children by informing parents of their rights under IDEA and assisting them in identifying and accessing resources needed to address their children's special needs. *Note: Applies only to programs serving preschool-age children*	1308.21(a)(6) 1308.21(a)(10)

Targeted Questions—FCE 3.1

FCE Coordinator—Interview

► Determine how the program provides home visits and parent-teacher conferences. Ask the coordinator to describe how home visits and parent-teachers conferences are conducted. Ask how the program ensures that all parents receive the required home visits and parent-teacher conferences.

Note: Applies only to programs with a center-based program option
FCE 3.1

ECD Coordinator—Interview

► Determine how the program provides home visits and parent-teacher conferences. Ask the coordinator to describe how home visits and parent-teacher conferences are conducted. Ask how the program ensures that all parents receive the required home visits and parent-teacher conferences.

Note: Applies only to programs with a center-based program option
FCE 3.1

Parent—Interview

► Ask parents about parent-teacher conferences and teacher home visits, focusing on the scheduling of services and the information shared with families.

Note: Applies only to programs with a center-based program option
FCE 3.1

Targeted Questions—FCE 3.2

Teacher, Home Visitor, FCC Provider, FCE Staff—Interview

► Determine how ECD and FCE staff encourage parents to be full partners in the education of their children. Ask them to describe and provide examples of how they do the following:

- Explain and share information obtained through screenings and assessments with parents
- Share specific learning strategies with parents to promote their children's learning during routines and play time
- Invite families to partner in planning activities in the program or home to promote their children's development and learning

FCE 3.2

► If the program serves children who are dual language learners, either currently or in the past, ask the staff to describe the following:

- How they identify children who are dual language learners
- How they inform the children's parents about the ECD services available to dual language learners
- How they share information with parents about children's educational progress in the five essential domains, in addition to the acquisition of English.

FCE 3.2

Parent—Interview

► Ask parents to share their experience in working with program staff for each of the following:

- Discussion of results of screenings and assessments with staff
- Discussion of learning strategies with staff to promote their children's learning during routines and play time
- Working with staff in planning activities in the program or home to promote their children's development and learning

FCE 3.2

► Ask the parents of dual language learners to share their experience in working with program staff to understand the educational services the program provides and their children's educational progress in the five essential domains, in addition to the acquisition of English.

FCE 3.2

► Determine how the program ensures that parents have an opportunity to enhance their parenting skills and understand their children's educational and overall developmental needs and activities. Ask the following questions:

- What types of information have they received about their children's developmental strengths or opportunities?
- Do they have an opportunity to partner with staff in developing goals for their children?
- How does the program share information about their children's progress?
- Are they provided opportunities to share concerns about their children's development?
- What information has the program shared about how they, as parents, can help promote their children's success as they get ready to enter school?

FCE 3.2

Targeted Questions—FCE 3.3

Parent—Interview

► Ask parents for examples of family literacy activities that are provided by the program and how the program helps them access literacy materials, services, and activities that engage the entire family. Listen for examples of the following:

- Supporting parents in their role as their children's first teacher by giving them strategies for interactive literacy activities at home and/or in the community
- Giving parents strategies they can use that support their children's language development

FCE 3.3

► Ask parents for examples of activities or strategies that the program uses to help support families' financial stability and financial literacy, including activities that support knowledge about budgeting, financial resources, tax assistance, and access to benefit programs such as:

- Tax credits, such as the EITC
- Debt reduction
- Benefits programs, such as TANF and SSI
- Financial education classes
- Individual development accounts (IDAs) supported by local programs that match families savings
- Help in setting up bank accounts for parents and children

FCE 3.3

FCE Staff—Interview

► Determine whether the program has provided opportunities, either directly or through referral, to both children and families to increase their access to materials, services, and activities essential to literacy development. Listen to determine whether the program used the following approaches:

- Interactive literacy activities between parents and their children

- Training for parents regarding how to be the primary teachers of their children and full partners in the education of their children
- Parent literacy training that leads to economic self-sufficiency and financial literacy

FCE 3.3

Targeted Questions—FCE 3.4

Disabilities Services Coordinator—Interview

► Determine how the program shares information with parents in a manner that supports them in becoming advocates for their children. Ask the coordinator to describe how the program:

- Informs parents of their rights under IDEA
- Engages parents in activities or communication aimed at building their self-confidence, skills, and knowledge in accessing resources
- Informs parents regarding advocacy strategies aimed at ensuring that the special needs of their children are met

Note: Applies only to programs serving preschool-age children
FCE 3.4

Parent—Interview

► Ask parents of children with disabilities to share examples of how the program has provided information to help them develop their knowledge about their children's disabilities. Listen for examples of how the program did the following:

- Informs them of their rights under IDEA
- Engages them in activities or communication aimed at building their self-confidence, skills, and knowledge in accessing resources
- Informs them as to how to advocate to ensure the special needs of their children are met

Note: Applies only to programs serving preschool-age children
FCE 3.4

Family & Community Engagement

Key Indicator #4—Parents in Transitions
The program engages families in the transition process.

Compliance Measures	Federal Regulations
4.1 The program has procedures to support successful transitions for enrolled children and families both into and out of Early Head Start and Head Start programs. The program engages parents in the transition process and encourages their continued involvement in their children's education and development. *Transition procedures must include:(i) Coordinating with the schools or other agencies to ensure that individual Early Head Start or Head Start children's relevant records are transferred to the school or next placement in which a child will enroll or from earlier placements to Early Head Start or Head Start; (ii) Outreach to encourage communication between Early Head Start or Head Start staff and their counterparts in the schools and other child care settings including principals, teachers, social workers and health staff to facilitate continuity of programming; (iii) Initiating meetings involving Head Start teachers and parents and kindergarten or elementary school teachers to discuss the developmental progress and abilities of individual children; and (iv) Initiating joint transition-related training for Early Head Start or Head Start staff and school or other child development staff.*	1304.40(h)(1) 1304.40(h)(3) 1304.41(c)(1)
4.2 The program initiates transition planning for each Early Head Start-enrolled child at least 6 months prior to the child's third birthday to ensure the most appropriate placement. *Note: Applies only to programs serving infants and toddlers*	1304.41(c)(2)

Targeted Questions—FCE 4.1

Parent—Interview

► Discuss the support the program provides when children are transitioning out of the program or from one program option to another (e.g., parents of children who are transitioning into EHS or Head Start or another new education setting). Ask parents to describe the transition process and how the program provided the following:

- Information, training, and connections to future early care and educational settings to help facilitate the transition process for both the parents and children
- Assistance in communicating with teachers and other school personnel so that they can participate in decisions related to their children's education
- Assistance with understanding their rights under Federal and State laws to prepare them to exercise their rights and responsibilities concerning the education of their children

FCE 4.1

FCE Staff—Interview

► Ask FCE staff about how they support and engage families in the transition process, and ask them to answer the following:

- What procedures do they use to support successful transitions? What agreements do they have with community partners to assist in transitions (e.g., LEAs and local school districts)?
- What types of education and training are provided to parents to prepare them to exercise their rights and responsibilities concerning the education of their children in the school setting?
- How do FCE staff assist parents in communicating with teachers and other school personnel (or staff in new early care and education programs, such as a childcare center) so that parents can participate in decisions related to their children's education?

FCE 4.1

Targeted Questions—FCE 4.2

Teacher, Home Visitor, FCC Provider, FCE Staff- Interview

► Determine how the program takes into account each of the following in transition planning for children enrolled in EHS:

- Begins at least 6 months prior to the child's third birthday
- Assesses each child's health status and developmental level
- Determines the progress made by the child and family while in Early Head Start
- Determines the availability of Head Start and other child development or childcare services in the community
- Provides evidence that the program made a determination as to whether the child should remain in EHS for additional months until he or she can transition into Head Start or another program

Note: Applies only to programs serving infants and toddlers
FCE 4.2

Family & Community Engagement

Key Indicator #5—Community Partnerships

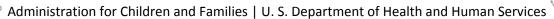*The program establishes community partnerships that support services to children and families.*

Compliance Measures	Federal Regulations
5.1 The program has established and maintains a Health Services Advisory Committee (HSAC).	1304.41(b)
5.2 The program has taken steps to establish ongoing collaborative relationships with community organizations that are responsive to community needs to promote the access of children and families to community services. *Note: Programs must take steps to establish ongoing collaborative relationships with the following community organizations:* *Health care providers, such as clinics and physicians, dentists, and other health professionals, Mental health providers, Nutrition service providers, Individuals and agencies providing services to children with disabilities and their families (see 45 CFR 1308.4 for specific service requirements), Family preservation and support services, Child Protective Services and any other agencies to which child abuse must be reported under State or Tribal law, Local elementary schools and other educational and cultural institutions, such as libraries and museums, for both children and families, Providers of childcare services, Any other organizations or businesses that may provide support and resources to families*	1304.41(a)(2)
5.3 The program coordinates with and has current Interagency Agreements in place with Local Education Agencies (LEAs) and other agencies (Part C) within the service area.	1304.41(a)(4) 1308.4(l)

Targeted Questions—FCE 5.1

Health Services Coordinator—Interview

► Determine whether the program has established and maintained a Health Services Advisory Committee (HSAC). Ask the coordinator to describe the members of the HSAC and their roles and responsibilities, including citing HSAC documents for examples of how members support the development of Health policies and procedures. Determine whether the HSAC membership includes:

- Head Start parents
- Professionals
- Other volunteers from the community

FCE 5.1

Targeted Questions—FCE 5.2

FCE Coordinator—Interview

► Determine whether the program has established ongoing collaborative relationships with community organizations.

Ask the FCE Coordinator about the community partners he or she works with. Determine whether the program has established relationships with all of the required service providers referenced in 1304.41(a)(2)(i-ix). Document the providers with whom the program has and has not developed partnerships.

Discuss with the FCE Coordinator the following:

- How these organizations are responsive to community needs
- How these relationships promote access to services by children and families served by the program
- How the program promotes ongoing relationships with these organizations

FCE 5.2

Targeted Questions—FCE 5.3

Interagency Agreements—Document

► Review the program's Interagency Agreements with all the LEAs and other agencies (including Part C agencies for programs serving infants and toddlers) within the grantee's service areas and determine whether they include the following:

- Referrals for evaluations, IEP/IFSP meetings, and placement decisions
- Transitions
- File and resource sharing (e.g., school readiness goals and assessment information)
- Current dates and signatures

FCE 5.3

Head Start/Early Head Start Director—Interview/Debrief

► Determine whether the program has developed all the necessary partnerships LEAs and Part C Agencies. Ask the Director for the number of Interagency Agreements needed to ensure that services are provided for all children with disabilities throughout the service area.

When multiple districts exist, ask the Director to describe the process for ensuring effective Interagency Agreements are developed and maintained.

If the program does not have formal agreements with some LEAs or Part C agencies, ask the Director the following:

- Why agreements have not been made, including a description of efforts to date
- If the Regional Office has been formally notified and their recommended next steps

FCE 5.3

Blank Page

Child Development and Education Introduction

Child Development and Education (CDE) captures information on a program's practices and systems to promote school readiness for all children enrolled in the program. Head Start programs are responsible for engaging in a process of creating school readiness goals that support all children's development in the five essential domains described in the Head Start Child Development and Early Learning Framework, and as appropriate, align school readiness goals with expectations of State Early Learning guidelines and local school districts.

Processes should be in place to collect, analyze, and aggregate school readiness data to track individual child progress, in addition to the progress of the program's overall school readiness goals. The curriculum implemented by the program should support the development of all children in each of the five essential domains and include strategies for individualizing for each child. By Monitoring Child Development and Education, the OHS is better able to ensure that Head Start programs are providing services necessary to promote the school readiness of all children.

Key Indicators of Program Performance

1. School Readiness

   The program has developed a system for establishing, tracking, using, and reporting school readiness goals.

2. Curriculum Selection and Implementation

   The program selects and implements a curriculum that supports the five essential domains of school readiness.

3. Individualizing

   The program individualizes early childhood development services for all children enrolled with the program.

4. Quality Teaching and Learning

   The program promotes quality teaching and learning for all program options.

Child Development and Education

Key Indicator #1—School Readiness

The program has developed a system for establishing, tracking, using, and reporting school readiness goals.

Compliance Measures	Federal Regulations
1.1 The program has engaged in a process to align its school readiness goals with the Head Start Child Development and Early Learning Framework, State Early Learning guidelines, and the requirements and expectations of the schools the children will attend to the extent that they apply to children participating in the Early Head Start or Head Start program and has consulted with the parents of children participating in the program.	1307.3(b)(1)(i-iii)
1.2 The program has a system and processes in place to do the following in order to track, use, and report progress on school readiness goals: **Aggregate and Analyze:** • Individual, ongoing child-level assessment data for all children birth to age 5 • For programs serving dual language learners (DLLs): Determines status and progress in acquiring the knowledge and skills described in the Head Start Child Development and Early Learning Framework (demonstrated in any language, including the child's home language) and toward learning English • Child-level data at least three times a year using data from one or more valid and reliable assessment tools **Use School Readiness Data:** • In combination with input from parents and families to determine each child's status and progress in the five essential domains • To individualize experiences, instructional strategies, and services to best support each child • In combination with other program data to determine progress towards meeting program goals • To assess the fidelity of implementation of the curriculum • To direct continuous improvement related to the effectiveness of curriculum, instruction, professional development, and program design or other program decisions based on the analysis of school readiness outcomes data **Report Results:** • To inform parents and the community of the program's progress in achieving school readiness goals *Note: Programs in operation less than 90 days are required to have a system to aggregate and analyze data at least twice during their program operation period.*	1307.3(b)(2)(i-ii)

Targeted Questions—CDE 1.1

ECD Coordinator—Interview

► Ask the ECD Coordinator to describe the process of alignment the program used to establish its school readiness goals and to describe the final results of the process.

Indicate whether the following elements were considered, to the extent that they apply to the children participating in the Early Head Start and/or Head Start program:

- Head Start Child Development and Early Learning Framework
- State Early Learning guidelines
- Requirements and expectations of the schools the children will attend

CDE 1.1

► Ask the ECD Coordinator to describe how parents are involved in the process of developing the program's school readiness goals.

CDE 1.1

► With the ECD Coordinator, review the program's school readiness goals and determine whether the goals include, at a minimum, the five essential developmental domains. Ask the coordinator to describe how the program ensured that the five essential domains were included in the goals. If one or more domains are missing, ask the ECD Coordinator to explain why.

Indicate whether each of the five essential domains is included in the program's school readiness goals:

- Language and Literacy Development
- Cognition and General Knowledge
- Approaches to Learning
- Physical Development and Health
- Social and Emotional Development

CDE 1.1

Targeted Questions—CDE 1.2

School Readiness Data System Assessment with ECD Coordinator and Director—Joint Interview

► Describe how the program analyzes individual, ongoing child-level assessment data for all children birth to age 5 in all program options (e.g., home-based, center-based, FCC, EHS, and HS).

CDE 1.2

► Describe how the program demonstrates that children who are dual language learners make progress in both acquiring the knowledge and skills described in the Head Start Child Development and Early Learning Framework and learning English.

CDE 1.2

► Describe the program's system to aggregate and analyze child-level assessment data at least three times during the program year (programs in operation less than 90 days have a system to aggregate and analyze child-level assessment data at least two times during the period of program operation).

Ask how the program analyzes this data across subgroups, as applicable (e.g., center-based vs. home-based). Note: programs will define their subgroups.

CDE 1.2

► Describe how the program uses data in combination with input from parents and families to determine each child's status and progress in the five essential domains.

CDE 1.2

► Describe how the program uses data to individualize experiences, instructional strategies and services to best support each child.

CDE 1.2

► Describe how the program uses aggregated data in combination with other program data (e.g., health tracking data, family service data) to determine progress towards meeting the overall school readiness goals of the program.

CDE 1.2

► Describe how the program directs continuous improvement related to the effectiveness of the following, based on the analysis of school readiness outcomes:

- Curriculum and instruction
- Professional development
- Program design
- Other program decisions

CDE 1.2

► Describe how the program informs parents and the community of the program's progress in achieving school readiness goals.

CDE 1.2

Teacher, Home Visitor, and FCC Provider – Interview

► Ask ECD staff to describe, citing specific examples, how they do the following:

- Use ongoing child-level assessment data to identify children's levels of development
- Provide experiences to support children's development
- Monitor children's progress throughout the program year

CDE 1.2

Child Development and Education

Key Indicator #2- Curriculum Selection and Implementation
The program selects and implements a curriculum that supports the five essential domains of school readiness.

Compliance Measures	Federal Regulations
2.1 The program selects and implements a curriculum that is evidence-based and is linked to ongoing assessment, with developmental and learning goals and measurable objectives.	642(f)(3)(C)
2.2 The program implements a curriculum that promotes young children's school readiness in the developmental areas presented in the Head Start Child Development and Early Learning Framework and, as appropriate, aligned with State early learning standards.	642(f)(3)(E)

Targeted Questions—CDE 2.1

ECD Coordinator—Interview

► List the curricula utilized by the program for each program option and age group.

  CDE 2.1

► Review the program's curriculum and related documentation with the ECD Coordinator. Ask the coordinator to describe the process of curriculum selection in order to develop an understanding of the program's evidence base that supports the curriculum choice. Determine whether the program considered the following:

- Program option
- Ages of children served
- Staff development and training
- Program's school readiness goals and measurement of progress
- Link to ongoing assessment--Include list of ongoing assessment tools in your evidence
- Inclusion of learning goals and measureable objectives

Based on your conversation with the ECD Coordinator, indicate whether the selected curriculum is:

- Evidence-based
- Linked to ongoing assessment
- Includes developmental and learning goals appropriate for the ages of children and program option
- Includes measureable objectives

  CDE 2.1

► If the program serves children who are dual language learners, ask the coordinator to describe how the use of the curricula supports the acquisition of knowledge and skills described in the Head Start Child Development and Early Learning Framework in addition to progress toward learning English.

  CDE 2.1

► Ask the coordinator to describe how the program determines whether the staff is implementing the curriculum as it is designed. If the program has modified the curriculum ask the coordinator to describe the types of modifications and the rationale for changes.

CDE 2.1

Targeted Questions—CDE 2.2

Teacher, Home Visitor, FCC Provider—Interview

► Ask ECD staff to describe and cite specific examples of how they use the curriculum to support the development and continued progress of all children in the five essential domains:

- Language and Literacy Development
- Cognition and General Knowledge
- Approaches to Learning
- Physical Development and Health
- Social and Emotional Development

CDE 2.2

► If the program provides services to children who are dual language learners, ask how the use of the curriculum allows children to demonstrate their abilities, skills, and knowledge in any language, including their home languages, and how the use of the curriculum supports their acquisition of English.

CDE 2.2

CDE Observations

► Did the setting reflect the implementation of curriculum experiences that promote Language and Literacy?

CDE 2.2

► Did the setting reflect the implementation of curriculum experiences that promote Cognition and General Knowledge?

CDE 2.2

► Did the setting reflect the implementation of curriculum experiences that promote Approaches to Learning?

CDE 2.2

► Did the setting reflect the implementation of curriculum experiences that promote Physical Development and Health?

CDE 2.2

► Did the setting reflect the implementation of curriculum experiences that promote Social and Emotional Development?

CDE 2.2

Child Development and Education

Key Indicator #3—Individualizing

The program individualizes early childhood development services for all children enrolled with the program.

Compliance Measures	Federal Regulations
3.1 The program uses information from ongoing observations, and evaluations, as well as insight from parents to determine how best to respond to each child's individual characteristics, strengths, and needs. *Note: Screenings results used for referring children for future evaluation is captured in Child Health and Safety and does not apply to individualizing in CDE.*	1304.20(f)(1)
3.2 Services provided to children with identified disabilities are designed to support the outcomes contained in their IEPs or IFSPs.	1308.19(k) 1304.20(f)(2)(i) 1304.21(a)(1)(ii)
3.3 The program designates a staff member or consultant to coordinate services for children with disabilities, including collaborating with other program coordinators (i.e., Education, Mental Health, and Nutrition) and staff. *Note: Applies only to programs serving preschool-age children*	1308.6(d) 1308.18(a-b) 1308.20(a)
3.4 The program has secured the services of a mental health professional including on-site consultation for program staff and families that provides for timely identification and interventions to address children's mental health concerns.	1304.24(a)(3)(i) 1304.24(a)(2)
3.5 The program's approach to Child Development and Education (CDE) is developmentally and linguistically appropriate and demonstrates an understanding that children have individual rates of development, interests, temperaments, languages, cultural backgrounds, and learning styles.	1304.21(a)(1)(i)

Targeted Questions—CDE 3.1
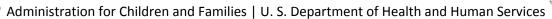
Teacher, Home Visitor, FCC Provider—Interview

► With the ECD Staff discuss the process for using information to plan goals and experiences that respond to each child's individual characteristics, strengths and needs.

Based on your conversation with the ECD Staff, indicate whether all of the following are included in individualizing for children:

- Ongoing observations (including ongoing assessments of progress)
- Medical and dental evaluations and treatments
- Insights from each child's family

If the ECD Staff indicate one or more of the sources are not used, ask them to explain why.

CDE 3.1

Targeted Questions—CDE 3.2

Teacher, Home Visitor, FCC Provider, Disabilities Coordinator—Interview

► Ask program staff to describe:

- How the program's approach to Child Development and Education (CDE) is inclusive of all children with disabilities
- How program staff modify the program and arrange for the provision of related services (as required in the IEP or IFSP) for all children with disabilities
- The resources available to them to support goals and services included in the IEP/IFSP
- How they collaborate with LEAs and Part C Agencies

CDE 3.2

Targeted Questions—CDE 3.3

Disabilities Services Coordinator—Interview

► Describe how the Disabilities Coordinator works in collaboration with other program coordinators and program staff to ensure required services are provided to children with disabilities.

Based on your notes, indicate whether the Disabilities Coordinator does the following:

- Coordinates with the ECD Coordinator to include information from ongoing developmental assessments for children with disabilities in diagnostic and program-planning activities
- Works with the Health Coordinator in the assessment process and follow-up process
- Works with the Mental Health Coordinator to help teachers identify children who show signs of problems
- Works with the Nutrition Coordinator and food-preparation staff to ensure that provisions to meet special needs are incorporated into the Nutrition program

If no, ask the Disabilities Coordinator to explain why.

CDE 3.3

Targeted Questions—CDE 3.4

Mental Health Services Coordinator—Interview

► Ask the Mental Health Coordinator to describe how the program uses the services of the mental health professional to identify and provide interventions to address mental health concerns and how frequently these consultations occur.

CDE 3.4

Mental Health Consultant—Interview

► Interview the Mental Health Consultant to determine the type of services he or she provides to the program. Ask the Consultant about the schedule of onsite mental health consultations. Describe how the consultant is involved in the design and implementation of program practices.

CDE 3.4

Mental Health Documents—Document

► If applicable, review the Consulting Agreement with the mental health professional to determine the types of services the professional is responsible for and the frequency with which he or she visits the program. If there are discrepancies between the content of the Consulting Agreement and the results of interviews, describe the discrepancies; and follow up as appropriate.

CDE 3.4

Targeted Questions—CDE 3.5

Teacher, Home Visitor and FCC Provider—Interview

► Discuss the program's approach to CDE and how the program supports each child's individual growth, development and progress. Ask the ECD Staff to describe the following:

- How they respond to individual interests, temperaments, languages, cultural backgrounds and learning styles
- How they accommodate for the needs of dual language learners, both orally and in writing
- How plans and outcomes are documented for all children

Ask them to share specific examples, and review curriculum-planning documents for children, as appropriate.

CDE 3.5

ECD Coordinator—Interview

► Discuss the program's overall approach to CDE and how the program supports each child's individual growth, development, and progress. Ask the coordinator to describe the following:

- How the approach is developmentally and linguistically appropriate for children enrolled in the program, including children who are dual language learners
- How the program ensures that children have opportunities to interact and demonstrate their abilities, skills, and knowledge in any language including their home language

CDE 3.5

Child Development and Education

Key Indicator #4—Quality Teaching and Learning

The program promotes quality teaching and learning for all program options.

Compliance Measures	Federal Regulations
4.1 The program hires teachers who have the required qualifications, training, and experience.	645A(h)(1) 648A(a)(3)(B)(i-iii)
4.2 The program ensures that Family Child Care Providers have the required qualifications, training, and experience. *Note: Applies only to programs with a Family Child Care program option*	1304.52(h)(1)
4.3 The program ensures that all full-time Head Start employees who provide direct education services to children have a professional development plan that is evaluated regularly to assess its impact on teacher and staff effectiveness.	648A(f)
4.4 The program ensures that home visitors have the required qualifications, training, and experience. *Note: Applies only to programs with a home-based program option*	1304.52(e)
4.5 When the majority of children speak the same language, at least one classroom staff member or home visitor interacting regularly with the children speaks their language.	1304.52(g)(2)
Teacher-Child Interactions	
4.6 Emotional Support™ • Positive Climate • Negative Climate • Teacher Sensitivity • Regard for Student Perspectives *Note: Applies only to programs with preschool classroom options*	CLASS™
4.7 Classroom Organization™ • Behavior Management • Productivity • Instructional Learning Formats *Note: Applies only to programs with preschool classroom options*	CLASS™
4.8 Instructional Support™ • Concept Development • Quality of Feedback • Language Modeling *Note: Applies only to programs with preschool classroom options*	CLASS™

Targeted Questions—CDE 4.1

Teacher—Preschool—Staff File

▶ Please enter the qualification of the preschool teacher:

- A baccalaureate or advanced degree in Early Childhood Education (ECE)
- A baccalaureate or advanced degree and coursework equivalent to a major relating to ECE, with experience teaching preschool-age children
- An associate's degree in ECE
- An associate's degree in a related field and coursework equivalent to a major relating to ECE, with experience teaching preschool-age children
- A baccalaureate degree and admission into the Teach For America program, passed a rigorous early childhood content exam such as Praxis II, taught preschool children in a Teach For America summer training institute, and is receiving ongoing professional development and support from Teach For America's professional staff
- Does not meet qualifications

CDE 4.1

Teacher—Infant/Toddler—Staff File

▶ Please enter the qualification of the infant-toddler teacher:

- A minimum of a current infant/toddler Child Development Associate (CDA) credential and have been trained (or have equivalent coursework) in early childhood development, including topics required under 1304.52(f)
- Does not meet qualifications

CDE 4.1

Staff File

▶ Is the professional development plan designed to ensure attainment of qualifications and is the staff person currently enrolled in a degree program?

Applies only to full-time preschool teachers who do not meet the required qualifications
CDE 4.1

Targeted Questions—CDE 4.2

FCC Provider—Staff File

▶ Please enter the qualification of the FCC provider:

- Previous ECE experience, current CDA
- Previous ECE experience, enrolled in CDA program (within six months of beginning service provision)
- Previous ECE experience and Associate's degree in child development or ECE (attained within two years of beginning service provision)
- Previous ECE experience and Bachelor's degree in child development or ECE (attained within two years of beginning service provision)

- Previous ECE experience and enrolled in an Associate's or Bachelor's degree program in child development or ECE (within 6 months of beginning service provision)
- Does not meet qualifications

CDE 4.2

Targeted Questions—CDE 4.3

Teacher, Home Visitor, Teacher Aide- Staff File

▶ Is there a professional development plan on file?

CDE 4.3

ECD Coordinator—Interview

▶ Ask the coordinator to describe:

- How the staff are involved in the development of their professional development plan
- How plans are evaluated to ensure that they have a positive impact on teacher and staff effectiveness
- How often professional development plans are evaluated
- How the program develops plans to ensure that teaching staff meet qualifications

CDE 4.3

Teacher—Interview

▶ Ask ECD staff about their professional development plans. Ask them to describe how their professional development plans are created, including:

- Who is involved in the process?
- What types of information are used to develop the plans?
- How often plans are evaluated and updated?

Ask staff to describe how their professional development plans impact their interactions with children and families, and, as applicable, supports them in meeting the qualifications required for their position.

CDE 4.3

Home Visitor—Interview

▶ Ask ECD staff about their professional development plans. Ask them to describe how their professional development plans are created, including:

- Who is involved in the process?
- What types of information are used to develop the plans?
- How often plans are evaluated and updated?

Ask staff to describe how their professional development plans impact their interactions with children and families, and, as applicable, supports them in meeting the qualifications required for their position.

CDE 4.3

Targeted Questions—CDE 4.4

ECD Coordinator—Interview

► Review the documents the program uses to track and monitor home-visiting staff qualifications, training, and performance with the ECD Coordinator. Ask the coordinator how the program confirms the knowledge and expertise of each home-visiting staff in the areas of:

- Child Development and Early Childhood Education
- Principles of child health, safety, and nutrition
- Adult learning principles
- Family dynamics
- Accessing community resources and referring families to appropriate agencies and services

While reviewing documents with the coordinator, determine the number of home visitors who have the required knowledge and expertise and the number who do not. Document any home visitors who do not have knowledge and experience in any of the above areas.

Next, discuss with the coordinator the process for evaluating the skills of home visitors. Does the process include assessing how the home visitors communicate with families and staff and how the home visitors motivate and engage families in program services?

Note: Applies only to programs with a home-based program option
CDE 4.4

Home Visitor—Interview

► Ask the home visitors for specific examples of how they have attained and maintained knowledge and experience in the following areas. Ask them to provide specific examples of how they have demonstrated these skills in their work with children and families:

- Child Development and Early Childhood Education
  - Engages families in supporting their children's growth and development

- Principles of child health, safety, and nutrition
- Adult learning principles
  - Respects and responds in ways appropriate to the culture, language, values, and family structure of each family served
  - Facilitates social networks and group activities that support families' strengths, interests, and needs

- Family dynamics
  - Engages in respectful, goal-oriented partnerships with families to promote parent-child relationships and family well-being
  - Enhances parent-child relationships and supports parents' roles as the first and lifelong educators of their children

- Accessing community resources and referring families to appropriate agencies and services
  - Supports families in using community resources that enhance family well-being and children's learning and development
  - Acts as a member of a comprehensive services team so that Family Services activities are coordinated and integrated throughout the program

Ask the home visitors to describe how they communicate with children and families, including the methods used and specific examples of this type of communication with children and families.

CDE 4.4

Targeted Questions—CDE 4.5

ECD Coordinator—Interview

► Ask the ECD Coordinator to describe the process to:

- Match the primary language of the child/children to the primary language of the teacher
- Ensure that staff can communicate with children and families who speak a language other than English

Review the documentation the program uses to track the languages of program staff, children and families with the coordinator. Determine the language spoken by the majority of children in each setting and determine if staff who speak this language are assigned to each setting.

CDE 4.5

Teacher, Home Visitor and FCC Provider—Interview

► Ask the ECD staff to describe how they communicate with children and families who speak a language other than English.

CDE 4.5