



Office of Head Start Monitoring Protocol

Program Governance and Management Systems Guides

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* Please note the Review Team Meeting Guide can be found on ECLKC in a separate document.



Interview

Governing Body—Interview

Program Governance Compliance Framework #1—Structure

- ▶ Interview the governing body to ensure that it has the correct composition to provide effective oversight of the Head Start program.

During your interview, talk with the governing body about its membership, how it recruits new members, and how it uses the skills of the required members to provide oversight to various parts of the program (such as: Fiscal, ECD, legal, community engagement, and parent input).

Note: Does not apply to American Indian or Alaskan Native Grantees

GOV 1.1

- ▶ Interview the Tribal Council to ensure that it has the correct composition or that it is in consultation with others who have the required background and expertise.

Ask questions about how the Tribal Council uses the skills and expertise of its members or consultants to provide oversight of and guidance to the Head Start program. The Tribal Council is the local government for AIAN Head Start programs, and you should familiarize yourself with the culture of the Council prior to conducting the interview.

Note: Applies only to AIAN programs

GOV 1.1

Program Governance Compliance Framework #2—Policies and Training

- ▶ Interview the governing body to ensure that all members are free from financial or other conflicts of interest.

Describe how the governing body ensures that there are no conflicts of interest. Did any members receive any type of compensation? Were family of members employed by the agency?

GOV 2.2



Program Governance Compliance Framework #3—Roles and Responsibilities

- ▶ Interview the governing body on the training and technical assistance (T/TA) it has received.

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

Focus on how the governing body uses the training. Your goal is to find out whether the governing body has received enough training to perform its role.

Familiarize yourself with the Governing Body Roles and Responsibilities prior to conducting this review. This part of the interview connects to additional information that you will learn about how the PC performs its role in this framework.

GOV 3.1

- ▶ Determine if the governing body exercised responsibility with respect to each of the following:
 - ▶ - Selecting delegate agencies, as appropriate
 - ▶ - Establishing procedures and criteria for recruiting, selecting, and enrolling children
 - ▶ - Developing procedures for selecting Policy Council members
 - ▶ - Reviewing applications for funding and amendments to applications for funding

Have members provide examples as to how these responsibilities have been exercised.

GOV 3.2

- ▶ Interview the governing body members on their roles and responsibilities. Your goal is to get examples of how and when they engage in legal and financial decisions, learn how they oversee the fiduciary health and well-being of the program, and determine whether they are effective in ensuring the fiscal integrity of the agency.

Note examples of how and when they engage in legal and financial decisions, how they oversee the fiduciary health and well-being of the program, and if they are effective in ensuring the fiscal integrity of the agency.

During you interview, determine how the governing body assumes responsibility for all required items.

GOV 3.3



- ▶ Interview the governing body to determine how actively engaged the members are in the oversight of program operations.

Collect evidence of how they use information from reports such as the annual Self-Assessments and program audits to approve decisions about the program's structure, changes, or improvements needed and program operations.

Focus your interview on how the governing body uses the information that it reviews. For example, how are members engaged in processes such as hiring or development of corrective action plans, and how does the approval process work?

Determine how engaged the governing body is in each of the required processes.

Use the information that you know from your RPA (preplanning) document to prepare for this interview. This document will contain information for past review reports, PIR data, audits, and information from the grantee's Self-Assessment.

GOV 3.4

Program Governance Compliance Framework #4—Reporting to Governing Body and Policy Council

- ▶ You have determined how the program uses most reports. Use this part of your interview to determine the timeliness of reports.

Determine how often the following reports are received by the governing bodies and discuss with them the quality and usefulness of any reports you have not discussed earlier. (Check the timeframes in which they should be received).

- ▶ Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- ▶ The financial audit
- ▶ The annual Self-Assessment, including any findings related to such assessment
- ▶ The community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency, including any applicable updates

- ▶ Communication and guidance from the Secretary
- ▶ Program Information Reports
- ▶ Financial statements
- ▶ Program information summaries
- ▶ Reports of meals and snacks provided through programs of the Department of Agriculture

If the reports are of poor quality and cannot be used by the governing bodies, capture that in your notes.

GOV 4.1



Head Start/Early Head Start Director—Interview/Debrief

Management Systems Compliance Framework #1—Program Planning

- ▶ Ask about the program’s planning process. What information is used; how it is used; who is involved; and how are goals developed? Find out the current stage of the planning process, whether the long- and short-term goals are being met as expected, and if not, what adjustments are being made in the planning process to do so.

Use this information to round out what you have heard from the team or give the members more information.

SYS 1.1

- ▶ With the Director, review the program's Self-Assessment. Discuss how the program uses the Self-Assessment as a part of the planning process. Ask how frequently it is conducted and what is included. Use this debriefing to inform or confirm what you learned or want to learn from the governing body and Policy Council. Determine whether those bodies truly have a role in designing the program or developing and evaluating the long-term and short-term goals of the grantee. Find out what the program does when it finds that it needs to make improvements and who is involved in those decisions.

Use this information to strengthen what you know about planning: 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.

Ask for a copy of the program's Self-Assessment to use as a basis for a discussion with the review team.

SYS 1.2

Management Systems Compliance Framework #2—Ongoing Monitoring, Record-Keeping, and Reporting

- ▶ In your debriefing sessions with the Director, ask about the ongoing monitoring process. Find out how ongoing monitoring supports program operations, is used to meet program goals and objectives, and what mechanisms the program uses to ensure the monitoring process is effective, timely, and informative.

SYS 2.1



- ▶ If there are any concerns with record-keeping and reporting, address the issues with the Director. Ask questions about the record-keeping and reporting system to help you pinpoint the causes of the issues. Ask questions about the frequency of reporting or the verification of accuracy and completeness of reports by the grantee staff.

SYS 2.2

- ▶ Ask about the program's Annual Report to the Public. Ask the 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 attempts to prepare children for kindergarten. Discuss with the Director how the annual report is made public to the community.

SYS 2.3

Management Systems Compliance Framework #3—Human Resources

- ▶ Refer to the program's organizational chart. Talk with the Director about how the program decided on its organizational structure. Ask about the organizational design and how that structure supports the program in accomplishing its goals and objectives. If there are issues that are found during the Review, talk with the Director to determine how structural weaknesses, such as vacancies, could be having an impact on services. Ask about processes in place to correct issues with organizational structure. For example, what is the program doing to ensure services are provided until a vacancy is filled?

SYS 3.1

- ▶ If there were any violations of the program's standards of conduct, talk to the Director about such violations and determine how appropriate penalties are or were enforced.

SYS 3.2

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

SYS 3.3



- ▶ If any staff members did not complete criminal record checks before hire, talk to the Director about what policies are in place, why checks were not completed, and what, if any, further steps will be taken to correct this issue.

SYS 3.4

Management Systems Compliance Framework #4—Communication

- ▶ Ask about the program's systems of communication. Get a feel for how the Director communicates with staff, how staff communicate with each other, and how parents are brought into the communication loop. Ask what systems are in place to ensure effective communication and what action is taken to improve communication when weaknesses are identified.

SYS 4.1

Family & Community Engagement Compliance Framework #5—Community Partnerships

- ▶ Interview the Program Director to determine whether the program has developed all the necessary partnerships with Local Education Agencies (LEAs).

Ask the Director to describe how the program's Interagency Agreements ensure that services are provided to children in each center. How is this done when centers span different geographic regions? Have all necessary agreements been completed?

FCE 5.3



Policy Council—Interview

Program Governance Compliance Framework #1—Structure

- ▶ Interview the Policy Council (PC) to determine whether it has the correct composition to provide effective oversight of the Head Start program.

During your interview, determine whether the PC has the correct composition, whether there is an appropriate election process, and whether the PC is effectively engaged in the design of the Head Start program and its objectives.

Determine whether the PC utilizes its membership to effectively exercise responsibility over both program design and operation and planning goals and objectives.

GOV 1.2

Program Governance Compliance Framework #2—Policies and Training

- ▶ Interview the Policy Council members about receiving reasonable reimbursement of their expenses for participation. Describe how members are informed about reimbursements for reasonable expenses incurred in connection with their participation in group responsibilities and whether there were members who were unable to participate because they were not offered reimbursement.

GOV 2.1

- ▶ Interview the Policy Council (PC) to ensure that all members are free from financial or other conflicts of interest.

Describe how the PC ensures that there are no conflicts of interest. Did any members receive any type of compensation? Were family of members employed by the agency?

GOV 2.2



Program Governance Compliance Framework #3—Roles and Responsibilities

- ▶ Interview the Policy Council (PC) on the training and technical assistance (T/TA) they have received.

Determine whether they receive training that is specific to their roles as PC members and whether they can articulate how that training has helped them make decisions about the Head Start program. In your interview, ensure that your focus is more about how the PC uses the training and not on the dates of specific trainings. Your goal is to find out whether the PC has received enough training to perform its role.

Familiarize yourself with the Policy Council Roles and Responsibilities prior to conducting this review. This part of the interview connects to additional information that you will learn about how the PC performs its role in this framework.

GOV 3.1

- ▶ Interview the Policy Council (PC) to determine how actively engaged it is in the oversight of program operations.

Collect evidence of how members review information from reports such as the annual Self-Assessments and program audits to approve decisions about program structure, changes or improvements needed, and program operations.

Focus your interview on how the PC is engaged in the approval and submission of each of the required processes. For example, how are members engaged in processes such as hiring and development of corrective action plans, and how does the approval process work?

Determine how engaged the PC is in each of its required processes.

Use the information that you know from your RPA (preplanning) document to prepare for this interview. This document will contain information for past review reports, PIR data, audits, and information from the program's Self-Assessment.

GOV 3.5



Program Governance Compliance Framework #4—Reporting to Governing Body and Policy Council

- ▶ You have determined how the grantee uses most reports. Use this part of your interview to determine the timeliness of reports.

Determine how often the following reports are received by the governing bodies and discuss with them the quality and usefulness of any reports you have not discussed earlier. (Check the timeframes in which they should be received).

- ▶ Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- ▶ The financial audit
- ▶ The annual Self-Assessment, including any findings related to such assessment
- ▶ The community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency, including any applicable updates
- ▶ Communication and guidance from the Secretary
- ▶ Program Information Reports
- ▶ Financial statements
- ▶ Program information summaries
- ▶ Reports of meals and snacks provided through programs of the Department of Agriculture

If the reports are of poor quality and cannot be used by the governing bodies, capture that in your notes.

GOV 4.1



Document Reviews

Criminal Record Checks—Document

Management Systems Compliance Framework #3—Human Resources

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

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

Determine if the program has completed criminal record checks 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 with the information documented in the criminal record check-tracking data, or if the team's Staff File reviews have resulted in a high number of staff with late or no criminal record checks, 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 criminal record checks and the number of staff with criminal record checks completed after their hire date. Indicate the source of evidence: the program's record check-tracking data, staff files, or both.

SYS 3.4



Governing Body—Documents

Program Governance Compliance Framework #1—Structure

- ▶ Based on the information gathered during your governing body interview, check the appropriate documents to gather evidence as needed. Ask the program to provide you with documentation to ensure that the required members exist and are an active part of the program’s oversight. Use documentation to ensure that the governing body has the required membership or uses consultants to fill each of the required roles.

GOV 1.1

Program Governance Compliance Framework #3—Roles and Responsibilities

- ▶ Ask the program to provide you with documentation of governing body training.
Ask for meeting minutes that describe the training as well as sign-in sheets to determine who attended.
Determine whether your document review confirms what you heard during the interview. If you have additional questions, have the Director identify the appropriate staff person to interview to clear up any discrepancies, and add an additional interview to your evidence.

GOV 3.1

- ▶ If you were not able to assess the governing body’s role in the responsibilities listed through the governing body interview, ask the program to provide you with the governing body meeting minutes or other documents as needed.
 - ▶ Selecting delegate agencies, as appropriate
 - ▶ Establishing procedures and criteria for recruiting, selecting, and enrolling children
 - ▶ Developing procedures for selecting Policy Council members
 - ▶ Reviewing applications for funding and amendments to applications for funding

GOV 3.2



- ▶ If the governing body interview indicates concerns about the review-and-approval process, review the governing body documents as needed.

Determine if all of the following were reviewed and approved by the 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
- ▶ Monitoring of the agency's actions to correct any audit findings and of other action necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices

GOV 3.3

- ▶ Ask the program to provide documentation that it supports the governing body's active participation in reviewing and approving the following:
 - ▶ The annual Self-Assessment
 - ▶ 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
 - ▶ 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

This documentation may include governing body meeting minutes or other documents that show how the grantee uses the information in the documents that it reviews, how it is engaged in processes, and the process for approving information that informs program decisions.

GOV 3.4



Program Governance Compliance Framework #4 – Reporting to Governing Body and Policy Council

- ▶ 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 for documentation that will help you determine whether reports were provided in the required timeframes and how the governing body was able to use those reports for program design, oversight, or improvement.

GOV 4.1

Health Exams—Document

Management Systems Compliance Framework #3 – Human Resources

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

If you have concerns with the data in the tracking system, or if the team's Staff File reviews have resulted in a high number of staff 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 evidence: the program's tracking system, staff files, or both.

SYS 3.3



Policy Council—Document

Program Governance Compliance Framework #1—Structure

- ▶ Based on the information gathered during your Policy Council (PC) interview, ask the program to provide the documents that you need to determine whether the PC has the appropriate composition, whether members are elected, and whether the PC has a role in program design.

When possible ask for electronic documents or scanned copies of the documents and upload those into the evidence binder.

GOV 1.2

- ▶ Ask the program to provide you with documentation that describes the policy for PC reimbursement. Describe the reimbursement process and how PC members are informed of that process.

When possible ask for electronic documents or scanned copies of the documents and upload those into the evidence binder.

GOV 2.1

Program Governance Compliance Framework #3—Roles and Responsibilities

- ▶ Ask the program to provide you with documentation of Policy Council training.

Ask for PC meeting minutes that describe the training as well as sign-in sheets to determine who attended.

Determine whether your document review confirms what you heard during the interview. If you have additional questions, have the Director identify the appropriate staff person to interview to clear up any discrepancies.

GOV 3.1



- ▶ If the PC interview indicates concerns, ask the program to provide documentation that supports the Policy Council’s active participation in the following items (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 for programs under this subchapter prior to submission of applications described in this clause
 - ▶ Budget planning for program expenditures, including policies for reimbursement 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 paragraph (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 will be elected
 - ▶ Recommendations on the selection of delegate agencies and the service areas for such agencies

GOV 3.5

Program Governance Compliance Framework #4—Reporting to Governing Body and Policy Council

- ▶ 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 for documentation that will help you determine whether reports were provided in the required timeframes and how the Policy Council was able to use those reports for program design, oversight, or improvement.

GOV 4.1



Strengths and Summary

Program Strengths

Management Systems Compliance Framework #5—Program Systems Summaries and Strengths

- ▶ Discuss with the Review Team members the results of their service area and fiscal reviews. Discuss the program strengths. What has the program designed and/or implemented that has resulted in quality services to children and families? What systems are in place to sustain these services? How has the program demonstrated integrity and accountability in Program Governance and Fiscal?

The Systems Reviewer is responsible for capturing information about potential strengths from the program, Regional Office and Review Team by creating a finding under SYS 5.1. All reports should have a potential area of strength identified. Please note that verification of a strength does not require two modes of inquiry or evidence, and should not be in conflict with any potential areas of non-compliance or deficiencies.

SYS 5.1

Management Systems and Program Governance Summary

Management Systems Compliance Framework #5—Program Systems Summaries and Strengths

- ▶ Describe your overall impressions of the Program's Governance and Management Systems. Determine if the program has effective systems in place to provide quality services to children and families, and is in compliance with Head Start 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 5.3