



Office of Head Start Monitoring Protocol

Management Systems and Program Governance Guides

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Interviews

Governing Body—Interview

Program Governance Key Indicator #1—Structure and Participation

- ▶ 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.

Program Governance Key Indicator #2—Roles, Responsibilities and Training

- ▶ 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.
- ▶ 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.

- ▶ 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
- ▶ 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

Program Governance Key Indicator #3—Reporting to Governing Body and Policy Council

- ▶ 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 (i.e., reports used for the ongoing monitoring of service areas)
- 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.



Policy Council—Interview

Program Governance Key Indicator #1—Structure and Participation

- ▶ 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

Program Governance Key Indicator #2—Roles, Responsibilities and Training

- ▶ 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.
- ▶ 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



Program Governance Key Indicator #3—Reporting to Governing Body and Policy Council

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Annual reports:

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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.



Head Start/Early Head Start Director—Interview

Management Systems Key Indicator #1—Program Planning

- ▶ 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:
- How the program uses the results of planning activities to design change and implement services provided to children and families:
- How are stakeholders engaged in the planning process (e.g., governing bodies, staff, parents)

- ▶ 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.

Management Systems Key Indicator #2—Ongoing Monitoring

- ▶ 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

Management Systems Key Indicator #3—Human Resources

- ▶ 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?
- ▶ 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)?
- ▶ 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 applied.
- ▶ 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.
- ▶ 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.

Management Systems Key Indicator #4—Communication

- ▶ 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.

Management Systems Key Indicator #5—Record-Keeping and Reporting

- ▶ 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?



- ▶ 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.

Family & Community Engagement Key Indicator #5—Community Partnerships

- ▶ 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



Review Team Meeting—Interview

Management Systems Team Discussion

Each night, begin your team meeting with a discussion of one or two of the following systems. All reviewers should come to the meeting prepared to discuss the system(s) of the day. As the RTL, share what you heard the Head Start Director articulate about the system. Facilitate a conversation with the reviewers about how they have observed the system being implemented within their service area.

Discussions should focus on the key elements of each system (listed below). If the team identifies concerns in the service area, these should be discussed in the context of the program's systems. As a team, work together to identify WHY the concerns exist: which of the program's systems isn't working as it should?

Take notes each night so that by the end of the week you have a detailed summary of each of the program's systems (document information about the system as a whole, not just concerns).

When you have gathered enough information, answer the yes/no questions about the key elements of each system. Note, your answers to these questions may change throughout the week as you gather additional evidence.

Monday

Program Planning

- ▶ Provide a comprehensive summary of the Program Planning System that includes each of the Key Elements (listed in the yes/no questions below).
- ▶ Does the program use information strategically to develop goals, objectives and plans for program management and service delivery?
- ▶ Does the program use the results of planning activities to design change and implement services provided to children and families?
- ▶ Does the program engage stakeholders in the planning process (governing bodies, staff, and parents)?

Tuesday

Human Resources

- ▶ Provide a comprehensive summary of the program's Human Resources System that includes each of the Key Elements (listed in the yes/no questions below).
- ▶ Does the program's organizational structure support the program's goals and objectives?
- ▶ Does the program's organizational structure address the major functions and responsibilities assigned to each staff position?
- ▶ Does the program provide adequate mechanisms for staff supervision and support?



Ongoing Monitoring

- ▶ Provide a comprehensive summary of the program's Ongoing Monitoring System that includes each of the Key Elements (listed in the yes/no questions below).
- ▶ Are tools and procedures used effectively and consistently by program staff?
- ▶ Is the frequency of monitoring adequate to ensure compliance with the regulations?
- ▶ Are staff who are responsible for and/or participate in ongoing monitoring activities performing their specific role(s)?
- ▶ Does the program analyze information gathered through ongoing monitoring?
- ▶ Does the program use their analysis of data to inform monitoring?
- ▶ If applicable, is there a process in place to ensure the ongoing monitoring of delegate agencies is implemented?

Wednesday

Communication

- ▶ Provide a comprehensive summary of the program's Communication System that includes each of the Key Elements (listed in the yes/no questions below).
- ▶ Does the program provide timely and accurate information to parents, policy groups, staff, and the general community?
- ▶ Do mechanisms exist for regular communication among all program staff to facilitate quality outcomes for children and families?

Record Keeping

- ▶ Provide a comprehensive summary of the program's Record Keeping System that includes each of the Key Elements (listed in the yes/no questions below).
- ▶ Does the program keep records up-to-date?
- ▶ Is the program's record keeping system reliable, and are there routine mechanisms for collecting data?
- ▶ Does the program's record keeping system ensure the accessibility of information to all appropriate parties?
- ▶ Does the program's record keeping system yield effective reports to inform planning, ongoing monitoring, reporting, and overall communication?
- ▶ Does the program ensure records are secure and confidentiality of children, families, and staff is maintained?



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.



Document Reviews

Governing Body—Document Review (Program Governance)

Program Governance Key Indicator #1—Structure and Participation

- ▶ 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.

Program Governance Key Indicator #2—Roles, Responsibilities and Training

- ▶ 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.

- ▶ 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
- ▶ 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



- ▶ 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

Program Governance Key Indicator #3—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 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.

Policy Council—Document Review (Program Governance)

Program Governance Key Indicator #1—Structure and Participation

- ▶ 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.

Program Governance Key Indicator #2—Roles, Responsibilities and Training

- ▶ 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.

- ▶ 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

Program Governance Key Indicator #3—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 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.

Criminal Record Checks—Document Review (Management Systems)

Management Systems Key Indicator #3—Human Resources

- ▶ 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.

Health Exams—Document Review (Management Systems)

Management Systems Key Indicator #3—Human Resources

- ▶ 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.



Summary

Program Governance Summary

Management Systems Key Indicator #6—Strengths and Summary Analysis

- ▶ 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.