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INFORMATION MEMORANDUM

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

SUBJECT: Safety of Children

INFORMATION:

The Office of Head Start (OHS) has become aware of a number of recent events related to the health and safety of Head Start children. These include children being left unattended in vehicles, a lack of supervision leading to injury on playgrounds, reports of bus drivers driving while under the influence, children wandering away from Head Start centers undetected, and unacceptable methods of child guidance. OHS considers these types of events to be very serious and indicative of systemic failures in a Head Start grantee's program operations.

The purpose of this Information Memorandum is to address the obligations of Head Start agencies to ensure adherence to all of the standards of conduct which include but are not limited to providing appropriate supervision of all enrolled children, ensuring staff and volunteers do everything they can to prevent injury and minimize the risk of harm to Head Start children, and using positive methods of child guidance.

All Head Start agencies are expected to comply with those Head Start regulations that mandate staff supervise the outdoor and indoor play areas so that children's safety can be easily monitored and ensured (45 CFR 1304.52(g)(5)) and that agencies establish and implement standards of conduct under which no child will be left alone or unsupervised (45 CFR 1304.52 (i)(1)(iii)). In addition, grantees are reminded that most state licensing regulations require children to be supervised at all times. These requirements are intended to protect children from harm and reduce the risk of injury. Protecting Head Start children from injury requires staff to limit children's access to hazards, either by eliminating them or by using barriers to prevent access to them. Furthermore, all Head Start agencies should work to anticipate potential injury-causing events and environments and should, therefore, have proactive plans and strategies to reduce the risk of injury to children.

It is further the responsibility of all Head Start agencies to have no tolerance for negligence that could lead to injury or the risk of injury. Head Start agencies must ensure they have established and implemented systems to prevent harm to children. Such systems should involve both specific actions and mechanisms for communication. In addition, these systems should have parallel back-ups to minimize any chance of breakdowns leading to preventable injury. The following are examples of specific actions that Head Start agencies could put in place as part of a sound injury prevention system:

- The bus driver and bus monitor should, independently of each other, take attendance as children board and disembark from the bus so that all children are accounted for at all times. A supervisor should review bus attendance sheets on a regular basis.
- The teacher and teacher's assistant should, aloud, count heads and agree that all children are accounted for prior to transitioning to a new area of the center.
- Programs should establish policies that ensure outdoor play areas are enclosed by fences or that staff are assigned to stay close so that children can be seen and prevented from getting into unsafe areas at all times.
- Programs should have systems in place to assess employees' continuing fitness and suitability for their positions.

This list is not exhaustive and represents examples of safety systems grantees may implement. There are many other strategies that may be effective. Each grantee must evaluate its own needs and risks and adopt appropriate strategies.

All Head Start/Early Head Start agencies are also required to comply with Head Start regulations that mandate their use of positive methods of child guidance and not engage in corporal punishment, emotional or physical abuse (45CFR 1304.52(i)(1)(iv)). In addition, grantees are reminded of the Mandated Reporting requirement as follows:

Mandated Reporting

All 50 States, the District of Columbia, and Puerto Rico require the reporting of suspected child abuse and neglect. Specific state laws governing mandated reporting can be found at http://www.childwelfare.gov/systemwide/laws_policies/state/. Head Start agency staff are mandated reporters who are legally obligated to report any potential child abuse or neglect to the appropriate child protection agency for their jurisdiction. This obligation includes potential abuse or neglect that occurs when a child is in the care of the Head Start agency as well as suspected abuse or neglect occurring outside the program.

Head Start agencies may find it useful to provide employees and volunteers in Head Start centers with an instruction sheet about child abuse reporting that contains a summary of the state child abuse reporting statute. In addition, a Head Start agency should notify its Regional Office whenever an incident occurs or a situation comes to light that gives rise to a mandated report. Remember, it is not the Head Start agency's responsibility to investigate, but rather to report potential instances of abuse or neglect.

Please direct any questions on this important matter to your OHS Regional Office.

/ Patricia E. Brown /

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