ALIGNED MONITORING SYSTEM 2.0

FY 2018

Focus Area One Monitoring Protocol

FY18 **TRAINING SERIES**

HEAD START

Understanding the Approach to Program Services

HEAD START

FY2018 Focus Area One Monitoring Protocol

Purpose

Focus Area One is an opportunity for grantees to discuss their program design, management, and governance structure. This focus area is designed to develop an understanding of each grantee's foundation for program services. Grantees will describe approaches to staffing structure, program design, health services, family services, fiscal infrastructure, and program governance.

Approach

The Focus Area One review is an off-site activity. The review begins with the reviewer conducting a document review using data and reports from the Head Start Enterprise System (HSES) and other sources to understand the needs of children and families and to learn about the grantee's program design. Prior to the call with the grantee, the reviewer also will talk with the grantee's regional program and fiscal specialists.

Following the document review, the reviewer will conduct a series of off-site telephone interviews with the grantee that occur during a 1-week period. These discussions will provide an understanding of the program's design and plans for implementing and ensuring comprehensive, high-quality services that meet the needs of children and families.

Methodology

Document Review. The reviewer will focus on the following listed documents, located in the HSES or other available sources.
- Grant application/goals
- Program Information Report data
- Community assessment summary
- Past monitoring data
- Self-assessment data
- Annual report
- Audits

Off-site Discussions
The reviewer will work with the grantee to identify the appropriate individuals to participate in the off-site discussions (e.g., governing body, policy council, managers, direct service staff, etc.).

Understanding the Approach to Program Services

Roadmap to the FY2018 Focus Area One Monitoring Protocol

This protocol will guide the discussions between the grantee and the reviewer during the Focus Area One review. It includes the topic areas for discussion, specific performance areas for assessment, and the Federal regulations associated with each area of performance. The protocol is divided into the following five topic areas:

- Program design and management
- Designing quality education and child development program services
- Designing quality health program services
- Designing quality family and community engagement program services
- Developing effective Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) strategies and fiscal infrastructure

Federal Regulations

Each section of the protocol includes a list of the Federal regulations grounding the discussions. This list ensures transparency regarding the regulations used when assessing grantee performance. Grantees should note that they remain accountable for all of the Head Start Program Performance Standards (HSPPS) and other Federal, State, and local regulations guiding program operations, management, and oversight.

What We Want to Learn

This section of the protocol outlines the topics for discussions between the reviewer and grantee. We designed the statements and questions listed in this section to stimulate a meaningful discussion that provides grantees an opportunity to describe the intentionality behind their program design, decisions and operations, the challenges they have experienced, strengths, and their strategies for continuous program improvement.

The questions and statements in the *What We Want to Learn* section are not intended to be exhaustive or to limit discussion. Using the *What We Want to Learn* sections as a guide, the reviewer and grantee may engage in discussion beyond the questions included in the protocol.

Performance Measures in the Monitoring Protocol

The performance measures identify the areas of performance that are the primary focus of the monitoring protocol. Each performance measure indicates the Federal regulations associated with that measure.

Program Design and Management

Overview

Purpose

Each grantee must design a program that meets community needs and ensures a program, fiscal, and human resources structure that provides effective management and oversight of all program areas. This section focuses on the intentionality of the grantee's program design and their ability to address the characteristics, strengths, and needs of children and families they serve. The purpose of this section is to gain a foundational knowledge of the grantee's program design and structure.

Approach

The reviewer will review documents to learn about the grantee's operational structure, program governance, and the community's needs. The grantee will have the opportunity to share what they have learned about the children and families in their community and how the program design is responsive to those needs and promotes school readiness. This section contains three areas for discussion: *the grantee's understanding of the needs within the community; the grantee's approach to providing effective management and oversight; and how the policy council and governing body fulfill their roles and responsibilities.*

Federal Regulations

1301.2(a)-(b) Governing body
1301.3(b)-(c) Policy council and policy committees
1301.5 Training
1302.11(a)-(b) Determining community strengths, needs, and resources
1302.20(a)-(b) Determining program structure: choosing a program option and delivering comprehensive services
1302.101(a) Management system
1302.102(a) Establishing program goals
1302.102(b) Monitoring program performance
1302.102(c) Using data for continuous improvement
1302.102(d) Reporting

What We Want to Learn

1. The grantee will describe how the community strengths and needs informed the program structure and design, including: 1302.11(a)-(b); 1302.20(a)-(b)
    *   How the grantee took into account various characteristics such as ethnicity, language, disabilities, mental health, children in foster care, homelessness, and working families when designing the program.
    *   How the selected program option(s) and program location meet the needs of children and families.
    *   How the program's staffing ratio meets the needs of children and families.
    *   How changes in the community have affected the type or location of services offered.

Program Design and Management

What We Want to Learn *(continued)*

2. Explore the grantee's approach to providing effective management and oversight of all program areas and fiduciary responsibilities, discussing:
   - How the program, in collaboration with the governing body and the policy council, develops goals for the provision of program services. 1302.102(a)
   - The process for monitoring program performance and using program data to evaluate progress and risk, and inform continuous improvement in all program service areas. 1302.102(b)-(c)
   - How the program plans to supervise staff and provide feedback to inform professional development opportunities and continuous program improvement. 1302.101(a)(2)
   - The process for using child-level assessment data and other program data to direct ongoing program improvement. 1302.102(c)(2)(ii)
   - What program leadership communicates to the program staff, policy council, and governing body, about program progress. 1302.102(b)-(d)
   - How the grantee ensures budget and staffing patterns support provision of a full range of services. 1302.101(a)(3)

3. Discuss how the grantee maintains a formal structure for program governance that includes a governing body, a policy council (or policy committee for delegates), and parent committees, including:
   - The composition of the governing body and policy council and the grantee's strategy for leveraging their expertise. 1301.2(a)-(b); 1301.3(b)-(c)
   - How the governing body and policy councils are equipped to meet their roles and responsibilities and to provide effective oversight. 1301.5

Performance Measures

1. *The grantee understands the community strengths, needs, and resources, and chooses their program option(s), structure, and design to meet the needs of children and families. 1302.11(a)-(b); 1302.20(a)-(b)*

2. *The grantee collaborates with the governing body and policy council to develop goals for the provision of program services. 1302.102(a)*

3. *Program leadership demonstrates an understanding of how to collect, use, and share data for ongoing monitoring and continuous improvement.1302.101(a)(2); 1302.102(b)-(d)*

4. *The grantee has a strategy for leveraging the expertise of the governing body and policy council, and meets the composition and duty requirements as outlined in the Head Start Act. 1301.2(a)-(b); 1301.3(b)-(c)*

5. *The governing body and policy council are equipped to meet their roles and responsibilities. 1301.5*

6. *The grantee has an approach for ensuring a program, fiscal, and human resource management structure that provides effective management and oversight to ensure high-quality service delivery. 1302.101(a)(1)*

Designing Quality Education and Child Development Program Services

Overview

Purpose

This section focuses on the grantee's approach to providing high-quality early education and child development services that promote the cognitive, social, and emotional growth of children, including those with disabilities, for later success in school.

Approach

The grantee will have the opportunity to describe their strategy for designing and implementing effective teaching practices and implementing safe, well-organized learning environments (and group socialization opportunities in home-based programs) that meet each child's needs. This section contains three areas for discussion: *how the grantee implements and supports teaching practices; how the grantee uses data to individualize for children; and how the home-based program option meets the needs of children and families.*

Federal Regulations

642(f)(3) Curriculum
1302.31(a)-(e) Teaching and the learning environment
1302.45(a)(1)-(2) Child mental health/social and emotional well being
1302.35(b)-(c) Education in home-based programs
1302.61(a) Additional services for children with disabilities
1302.91(d)-(e) Staff qualifications and competency requirements
1302.92(a)-(b) Training and professional development
1302.101(a)(2) Management system

The Head Start Early Learning Outcomes Framework

CENTRAL DOMAINS				
APPROACHES TO LEARNING	SOCIAL AND EMOTIONAL DEVELOPMENT	LANGUAGE AND LITERACY	COGNITION	PERCEPTUAL, MOTOR, AND PHYSICAL DEVELOPMENT
▲ INFANT/ TODDLER DOMAINS	Approaches to Learning	Social and Emotional Development	Language and Communication	Cognition	Perceptual, Motor, and Physical Development
● PRESCHOOLER DOMAINS	Approaches to Learning	Social and Emotional Development	Language and Communication	Mathematics Development	Perceptual, Motor, and Physical Development
			Literacy	Scientific Reasoning	

What We Want to Learn

1. The grantee will describe how teaching practices and learning environments promote progress toward development. The grantee will discuss:

    - Why the grantee chose their curriculum – how it is responsive to the needs of the community it serves and how it will help the program meet its goals. 642(f)(3)
    - Plans for providing nurturing and responsive environments and interactions that foster trust, support, emotional security, language development, and critical thinking. 1302.31(b)(1)(i)
    - Strategies for ensuring teaching practices focus on achieving progress in all of the areas outlined in the Head Start Early Learning Outcomes Framework (HSELOF). 1302.31(b)(1)(iv)
    - Teaching practices that promote high-quality learning experiences through curriculum, activities, schedules, and lesson plans. 1302.31(b)(1)(ii)
    - Strategies for promoting learning through approaches to rest, meals, routines, and physical development. 1302.31(e)
    - For dual language learners, the program's teaching practices to support bilingualism and biliteracy. 1302.31(b)(2)
    - How the grantee designed the materials and indoor and outdoor spaces for learning to support the implementation of the curriculum and promote children's interest in development and learning. 1302.31(d)
    - Allocation of funding for the curricula, training, and classroom materials. 1302.101(a)(3)

Designing Quality Education and Child Development Program Services

What We Want to Learn (continued)

2. The grantee will describe the program's strategy for integrating child assessment data in individual and group planning. The grantee will discuss:
   - The strategies for analyzing individual and ongoing child-level assessment data and evaluating children's progress. 1302.31(b)(1)(iii)
   - The approach to individualization for children including those with disabilities. 1302.31(b)(1)(iii); 1302.61(a)

3. The grantee will describe how the program supports effective teaching practices and learning environments. The grantee will discuss:
   - The qualifications required for managers and staff, and if staff currently meets those requirements. 1302.91(d)(2), 1032.91(e)
   - The methods for training education staff and how the program focuses on effective curriculum implementation and knowledge of the content in HSELOF. 1302.92(b)(5)
   - How the grantee supervises teachers' implementation of the curriculum to understand the effectiveness of its teaching practices. 1302.101(a)(2)
   - How the grantee provides support for effective classroom management and teaching practices to support challenging behaviors, and social, emotional, and other mental health concerns. 1302.45(a)(1)
   - The method for securing mental health consultation services. 1302.45(a)(2)

4. For grantees with home-based programs, the grantee will describe how the home-based program design meets the needs of children and families. The discussion will include how the grantee:
   - Plans home visits, including planning home visits to occur with sufficient time, appropriate staff, and parents' presence. 1032.35(b)
   - Addresses needs of families, including language needs. 1302.35(c)
   - Uses assessment information to individualize learning experiences. 1302.35(b)
   - Ensures home visit activities are age- and developmentally appropriate and promote the home as a learning environment that is safe, nurturing, responsive, and language- and communication-rich. 1302.35(c)
   - Uses the home-based program to promote secure parent-child relationships. 1302.35(c)

Performance Measures

1. *Using a developmentally appropriate, research-based curriculum aligned with the HSELOF, the grantee has designed teaching practices and learning environments that promote progress toward children's development and growth. 1302.31(b)(1)(i); 1302.31(b)(1)(ii); 1302.31(b)(1)(iv); 1302.31(d); 1302.31(e); 642(f)(3)*

2. *The grantee's teaching practices include a strategy for integrating child assessment data into individual and group planning to promote each child's development and growth. 1302.31(b)(1)(iii); 1302.61(a); 1302.31(b)(2)*

3. *The grantee has a system for supporting effective teaching practices and learning environments, including hiring, training, developing, and supporting staff. 1302.45(a)(1)-(2); 1302.91(d)(2); 1032.91(e); 1302.92(b)(5); 1302.101(a)(2)*

4. *The grantee can describe their approach for providing home-based program services through home visits and group socialization activities that promote secure parent-child relationships and help parents provide high-quality early learning experiences for their children. 1302.35(b)-(c)*

Designing Quality Health Program Services

Overview

Purpose

This section focuses on how the grantee provides high-quality health, oral health, mental health, and nutrition services that are developmentally, culturally, and linguistically appropriate and are supportive of each child's growth and school readiness. This section also focuses on the grantee's approach for maintaining a system of health and safety practices that ensures children's safety at all times.

Approach

The reviewer will conduct an off-site interview with the management staff responsible for ensuring the delivery of high-quality health, oral health, mental health, and nutrition services to support children's growth and school readiness. The reviewer also will ask how the grantee ensures health and safety practices that ensure children's safety. This section contains two primary areas of discussion: child health and environmental safety practices.

Federal Regulations

1302.40 Health Services Advisory Committee (HSAC)

1302.41 Collaboration and communication with parents

1302.42(a)-(d) Child health status and care

1302.43 Oral health practices

1302.44(a) Child nutrition

1302.45(b)(1) Mental health consultants

1302.47(b)(1)-(4) Safety practices: system of management

Sec. 648A(g)(3)* Staff recruitment and selection procedures: criminal record checks

1302.90(c) Standards of conduct

1302.101(a) Management system

*Fiscal Year 2018 monitoring will focus on Head Start Act requirements for criminal record checks to allow time for grantees to align their procedures with new background check requirements under 1302.90(b) of the HSPPS.

What We Want to Learn

Child Health Services

1. The grantee will describe the approach to ensuring delivery of high-quality health services. The description will include how the grantee:
   - Understands, tracks, and shares information on children's health status and needs, including preventive health care, oral health, mental health, and nutrition (include timeliness in conducting screenings). 1302.42(a)-(c); 1302.43; 1302.44(a)
   - Leverages expertise of the HSAC including Head Start parents, health professionals, and in the community to learn about and support each child's health and mental health needs. 1302.40(b); 1302.45(b)(1)
   - Learns from families and staff about children's health and well-being. 1302.41
   - Assists families with referrals, follow-up, and access to care and treatment. 1302.42(a)(2); 1302.42(c)(1); 1302.42(d)

Designing Quality Health Program Services

What We Want to Learn (continued)

Health and Safety Practices

2. The grantee will describe the system for ensuring all facilities, equipment, and materials are safe for children. The discussion will focus on areas such as but not limited to the following:
   - The grantee's approach to ensuring routine safety in the learning environment (indoor and outdoor facilities, equipment, and materials). 1302.47(b)(1)-(2)
   - How the grantee designs an ongoing system of preventive maintenance to ensure safe learning environments and transportation for children. 1302.47(b)(1)(ix)
   - How the grantee allocates funding for staffing and resources to ensure the safety of facilities, equipment, and materials. 1302.101(a)(3)

3. The grantee will describe how managers ensure staff understands, recognizes, and effectively maintains safe environments for children. The discussion may include areas such as the following:
   - The grantee's approach to ensuring all staff has background checks, including the timeliness of the background checks. 648A(g)(3)
   - The plans for monitoring staff practices for maintaining children's health and safety, including the system for providing performance feedback (on safety) to program staff (e.g., who monitors, how often, what is monitored, and how feedback is shared). 1302.101(a)(2)
   - The grantee's strategy for training staff on safety practices and procedures. 1302.47(b)(4)
   - How the grantee plans to ensure that all staff abides by the program's standard of conduct. 1302.90(c)

Performance Measures

1. *The grantee has an effective strategy for collecting, tracking, addressing, and sharing information regarding each child's health status and health needs (including health, mental health, oral health, and nutritional needs). 1302.40; 1302.41; 1302.42(a)-(d); 1302.43; 1302.44(a); 1302.45(b)(1)*

2. *The grantee has described a system of management to ensure all facilities, equipment, and materials are safe for children (collaborate with the fiscal reviewer). 1302.47(b)*

3. *The grantee has in place a process for ensuring staff members receive background checks and feedback and training to support them in maintaining healthy and safe environments for children. 1302.47(b)(4); 1302.90(c); 1302.101(a)(2); 648A(g)(3)*

Designing Quality Family and Community Engagement Program Services

Overview

Purpose

The grantee must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children's learning and development. Programs are encouraged to develop innovative two-generation approaches that address prevalent needs of families across their program and that leverage community partnerships or other funding sources.

Approach

During the off-site interview, the grantee will provide information about their strategy for integrating high-quality family engagement services into all areas of programming that are responsive to the needs of families. The grantee will have the opportunity to discuss the expected outcomes for families and how the program design supports achieving those outcomes. *This section contains three areas for discussion: the grantee's integration of family services; the program's foundation for family engagement; and the grantee's strategies for measuring the outcomes for family engagement.*

Federal Regulations

1302.50 Family engagement approach
1302.51(a) Parent activities to promote child learning and development
1302.52(a)-(c) Family partnership services
1302.53(a)(1) Community partnerships
1302.91(e)(7) Staff qualifications and competency
1302.92(a)-(b) Training and professional development
1302.101(a) Management system
1302.102(a)-(c) Achieving program goals

What We Want to Learn

1. The grantee will discuss the integration of family and community engagement services into all systems and program services. 1302.50(a); 1302.50(b)(4)
   - Describe how the program offers opportunities for families to engage fully in program services such as:
     - Education
     - Health, mental health, disabilities
     - Program governance
     - Volunteering and opportunities for employment

Designing Quality Family and Community Engagement Program Services

What We Want to Learn (continued)

2. The grantee will discuss the program's foundation for parent, family, and community engagement, including:
   - The grantee's approach to ensuring family services staff meet qualifications. 1302.91(e)(7)
   - The grantee's strategy for supporting and supervising staff for continuous improvement. 1302.101(a)(2)
   - The methods for training all staff in family engagement and support services. 1302.92(b)(3)
   - How the grantee ensures adequate funding to implement family engagement and support services. 1302.101(a)(3)

3. The grantee will describe the strategies for parent and family engagement in the program environment, family partnerships, teaching and learning, and community partnerships, discussing:
   - Developing welcoming program environments that incorporate the unique cultural, ethnic, and linguistic backgrounds of families in the program. 1302.50(b)(2)
   - Enacting the family partnership process including developing family partnership agreements and activities based on parents' interest and needs. 1302.52(a)
   - Fostering parental confidence and skills in promoting children's learning and development. 1302.51(a)
   - Establishing ongoing collaborative relationships and partnerships with community organizations that are responsive to family's strengths, needs and goals. 1302.53(a)(1)

4. The grantee will discuss family engagement outcomes strategies, including :
   - Describing which family outcomes as described in the Head Start Parent Family and Community Engagement Framework are a priority for the grantee and how they determined those priorities. 1302.52(b)
   - Discussing the grantee's plans or approaches to address those family outcomes areas. 1302.50(b)(3); 1302.52(c)
   - Describing how the grantee is measuring the program impact in this area and how well the approach is working. 1302.102(a)-(c)

Performance Measures

1. *The grantee integrates family engagement and support services into all areas of programming. 1302.50(a)*

2. *The grantee ensures family service staff has the qualifications, skills, and support to address the needs of the children and families enrolled in the program. 1302.91(e)(7); 1302.92(b)(3); 1302.101(a)(2)*

3. *The grantee has an approach for cultivating a family engagement and services approach that includes creating a welcoming environment for parents, customizing family partnerships, enhancing parenting skill, and developing community partnerships that are responsive to the needs of families. 1302.50(b)(2); 1302.50(b)(4); 1302.51(a); 1302.52(a); 1302.53(a)(1)*

4. *The grantee has a strategy to collect data from family engagement and support efforts to identify needs, interests, strengths, and goals to help families achieve individualized family engagement outcomes. 1302.50(b)(3); 1302.52(b)-(c)*

Developing Effective ERSEA Strategies and Fiscal Infrastructure

Overview

Purpose

In this section, the grantee will describe how the program's recruitment and selection strategies are responsive to the needs of the community's eligible children and families, and the strategy for maintaining their funded enrollment level. The grantee also will provide information about the program's fiscal capacity and financial infrastructure.

Approach

The reviewer will discuss the grantee's strategy for recruiting and selecting eligible children and families. The fiscal representative will discuss how the program supports the accomplishment of program goals and effectively oversees program funds and property through a sound financial management system and responsive budget.

Federal Regulations

1302.12(i) Verifying eligibility

1302.13 Recruitment of children

1302.14(a)-(b) Selection process and children eligible for services under the Individuals with Disabilities Education Act (IDEA)

1302.15(a) Funded enrollment

1302.91(c) Staff qualifications and competency requirements

1302.101(a)(1) Program, fiscal, and human resource management structure

1302.101(a)(3) Management system implementation: budget

1302.101 (a)(4) Management system implementation: record keeping

1303.4 Non-Federal match

1303.5 Administrative cost

1303.30 Grantee responsibility and accountability

75.301 Performance measurement

75.302 Financial management and standards for financial management systems

75.308 Revision of budget and program plans.

75.303 Internal controls

75.342 Monitoring and reporting program performance

75.352 Requirements for pass-through entities

75.405 Cost allocation

75.414 Indirect cost

642(c)(1)(B) Governing body composition

642(c)(1)(E)(iv)(VII)(aa)-(bb) Governing body responsibilities

642(c)(2)(D)(iii)-(iv) Policy council responsibilities

Developing Effective ERSEA Strategies and Fiscal Infrastructure

What We Want to Learn

Eligibility, Recruitment, Selection, Enrollment, and Attendance

1. The grantee will describe the program's recruitment strategy. The discussion may include topics such as the following:
    - How the grantee's recruitment strategy reflects the grantee's understanding of the characteristics and needs of the community's eligible children and families. 1302.13
    - The grantee's strategy for recruiting children with disabilities and other vulnerable children, including homeless children and children in foster care. 1302.13
    - Whether the program has allocated sufficient resources (e.g., staffing, materials, and budget) to the recruitment and selection process. 1302.101(a)(3)

2. The grantee will describe how they designed their selection criteria to identify and meet the needs of families most in need and the grantee's plan for maintaining full enrollment. This includes:
    - Explaining how the selection criteria prioritize the selection of children and families most in need. 1302.14(a)-(b)
    - Describing the grantee's verification process for determining eligibility. 1302.12(i)
    - Detailing the grantee's plan for meeting and maintaining full enrollment. 1302.15(a)
    - Describing any challenges the grantee may have encountered in reaching full enrollment, including what the grantee is doing to address the challenges. 1302.15(a)

Fiscal Infrastructure, Capacity, and Responsiveness

3. The grantee will describe the qualifications (experience and education) of the fiscal officer primarily responsible for the grant award(s).
    - Does the fiscal officer have a degree if hired after November 2016? 1302.91(c)

4. The grantee will identify the member or advisor to the governing body with a background and expertise in fiscal management or accounting, and how the grantee utilizes his or her expertise. 642(c)(1)(B)

5. The grantee will describe the budget development process, including:
    - Who is involved. 642(c)(1)(E)(iv)(VII)(aa)-(bb) (governing body) and 642(c)(2)(D)(iii)-(iv) (policy council)
    - How the budget aligns with program design and goals. 1302.101(a)(3)
    - How the grantee ensures continuous alignment between the budget and the program design, scope, and objectives by revising the budget and obtaining appropriate approvals as needed. 75.308

6. The grantee will discuss how the grantee uses budget data to ensure the achievement of quality services, program goals, and outcomes including identifying: 75.301, 75.342(a)
    - How the grantee monitors the budget to ensure effective control over and accountability for funds 75.302(b)(4)
    - The data the grantee relies on to monitor the budget, compare actual expenditures to plans, and guide decision making. 75.302(b)(3) and (b)(5)

Developing Effective ERSEA Strategies and Fiscal Infrastructure

What We Want to Learn (continued)

Fiscal Infrastructure, Capacity, and Responsiveness (continued)

7. The grantee will describe how the grantee's financial management system will ensure the grantee remains in compliance with applicable Federal statutes, regulations, and grant terms and conditions. This will include: 1302.101(a)(1) and 1303-Subpart A
   - Describing the grantee's automated accounting and record keeping system and how they use their system. 75.302 (b); 1302.101(a)(4)
   - Discussing internal controls. 75.303 (non-Federal match); 1303.4 (cost allocation); 75.405, (indirect costs); 75.414, (administrative cost); 1303.5; 75.352
   - If applicable, explaining how the grantee oversees the financial performance of delegate agencies. 1303.30

Performance Measures

1. *The grantee demonstrates they tailor their recruitment strategies to reach out actively to children and families in the community most in need of services. 1302.13*

2. *The grantee develops and implements selection criteria that prioritizes selection of participants based on need and recognizes the need to ensure at least 10 percent of funded enrollment is filled by children eligible for services under IDEA. 1302.14(a)-(b)*

3. *The grantee has a plan for meeting full enrollment and addressing challenges to meeting full enrollment. 1302.15(a)*

4. *The grantee has a verification process for determining eligibility. 1302.12(i)*

5. *The grantee's fiscal officer and the fiscal member or the advisor to the governing body has the qualifications needed to provide oversight of the grant. 642(c)(1)(B), 1302.91(c)*

6. *The grantee has a budget development and revision process that includes stakeholders and appropriate approvals, and ensures continuous alignment with program design, goals, and objectives. 1302.101(a)(3); 642(c)(1)(E)(iv)(VII)(aa)-(bb); 642(c)(2)(D)(iii)-(iv); 75.308*

7. *The grantee uses budget data to ensure the achievement of quality services, program goals, and outcomes. 75.301; 75.302(b)(3)-(5); 75.342(a)*

8. *The grantee designed the financial management system to allow them to remain in compliance with applicable Federal statutes, regulations, and grant terms and conditions. 1302.101(a)(1) and 1303-Subpart A 75.302 (b); 75.352; 75.303; 75.405; 75.414; 1303.4; 1303.5; 1303.30; 1302.101 (a)(4)*