

FY2018 Focus Area Two Monitoring Protocol



Purpose

Focus Area Two is an opportunity for grantees to demonstrate their effectiveness in implementing a high-quality program to promote positive outcomes and school readiness for children and their families. This focus area is designed to broaden our understanding of each grantee's performance and to determine if programs are meeting the requirements of the Head Start Program Performance Standards (HSPPS), Uniform Guidance, and Head Start Act.



Approach

The Focus Area Two review begins with a reviewer conducting preplanning calls (off-site telephone discussions) with the fiscal and program specialists, reviewing existing program information, and discussing with the grantee the following:

- Key changes that affect program design and services, such as leadership changes, staff turnover, curricula changes or shifts in the demographics, and characteristics or needs of the populations served.
- What the program has learned about its own performance and progress toward school readiness and other program goals.

Next, reviewers will conduct an onsite progress and compliance review that typically lasts one week. Each onsite review will contain a fiscal reviewer and two Head Start program reviewers. The review team size may vary based on program size.



Methodology

Document Review

The reviewers will learn about grantee performance prior to the onsite review by first reviewing documents such as the grant application, self-assessment summary results, annual reports to the public, reports on program goals, enrollment reports, progress and performance reports, and annual updates to the community assessment.

Onsite Review

The onsite review includes discussions, classroom explorations, and data tours. Discussions will occur with program management, staff, parents, the governing body, the policy council, and teachers (at the end of each classroom exploration). *Data tours* are a new feature of the onsite review. Conducted with management staff, center leaders, and directors, data tours are an opportunity for the grantee staff to show the data they collect, analyze, use, and share to make informed program decisions.

Roadmap to the FY2018 Focus Area Two Monitoring Protocol

This protocol will guide the discussions between the grantee and reviewers during the Focus Area Two review. It includes the topic areas, specific performance measures, and the Federal regulations. The protocol is divided into the following six sections:

- Program design and management
- Monitoring and implementing quality education and child development services
- Monitoring and implementing quality health program services
- Monitoring and implementing quality family and community engagement services
- Monitoring and implementing fiscal infrastructure
- Monitoring Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA): eligibility and attendance

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 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 topic areas the reviewers will explore and the various methodologies reviewers will use to learn about grantee performance (e.g., data tour, exploration of classrooms, discussions with managers, teachers, parents, and governing bodies). The statements and questions listed in this section are designed to stimulate a meaningful discussion that provides grantees with 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* section as a guide, the reviewers and grantee may engage in discussions 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

The grantee will demonstrate how the program provides management, ongoing monitoring, and continuous improvement for achieving program goals, ensuring child safety, and ensuring the delivery of effective, high-quality program services.

Approach

The grantee will have the opportunity to share information about their progress in implementing the HSPPS. This section includes a discussion between grantee management staff and the review team of the systems and data the grantee uses to manage and monitor progress and continuous improvement. It also includes a conversation with the governing body.

Federal Regulations

1301.2 Governing body use of information and data

1301.3 Policy council use of information and data

1302.101(a)-(b) Management system implementation and coordinated approaches

1302.102(b) Monitoring program performance

1302.102(c) Using data for ongoing improvement

1302.102(d) Reporting

642(c)(1)(E) Governing body responsibilities

642(c)(2)(D) Policy council responsibilities

642(d)(2) Program governance administration

What We Want to Learn

1. The grantee will describe the program, fiscal, and human resource management structure that provides effective management and oversight of all program areas. 1302.101(a)(1)
2. The grantee will show how the program oversees and evaluates progress toward meeting program goals.
 - Discuss the grantee's self-assessment data and how the program uses that data to evaluate progress toward program goals and school readiness. 1302.102(b)(2)(i)
 - Tour the data that managers use to identify program strengths and needs, develop and implement plans, collect and use self-assessment data, and continually evaluate compliance with program performance standards and progress toward achieving goals. 1302.102(c)(1) (*See individual content areas for content specific data tour*)
 - Discuss how the program's recordkeeping system facilitates effective oversight of program operations. 1302.101(a)(4)
 - Discuss the systems in place for monitoring program improvement and the prevention of recurrences of previously identified quality and compliance issues. 1302.102(b)(1)
 - Discuss the strategies managers use to supervise and support individual staff professional development and continuous program quality improvement. 1302.101(a)(2)

Program Design and Management

What We Want to Learn (continued)

3. The governing body will demonstrate how they use data to administer and oversee the program to ensure quality services for children and families and progress toward school readiness.
 - Discuss how the governing body uses ongoing monitoring, fiscal, school readiness, and other data such as audits, self-assessment, and monitoring monthly reports to participate fully in the oversight, planning, and evaluation of the program. 1301.2(b)(2); 1302.102(b)-(d); 642(c)(1)(E); 642(d)(2)
 - Ask governing body members to discuss their system for ongoing financial oversight including approval of major expenditures, approval of the operating budget, selection of the auditor, and monitoring the program's actions to correct any audit findings. 642(c)(1)(E)(iv)(VII)-(VIII)
4. The policy council will describe how it uses program data to support ongoing program improvement. 1301.3(c)(2); 642(c)(2)(D); 1302.102

Performance Measures

Reviewer note: Use the information gathered throughout the protocol to assess these performance measures.

1. The grantee ensures a program, fiscal, and human resource management structure that provides effective management and oversight of all program areas. 1302.101(a)(1)
2. The grantee demonstrates an understanding of how to collect, use, and share data for ongoing monitoring and continuous improvement. 1302.102; 1302.101(a)(4)
3. The grantee develops and maintains an effective system of ongoing supervision that supports individual staff professional development and continuous program quality improvement. 1302.101(a)(2)
4. The governing body uses data and leverages its subject matter expertise effectively for program oversight, ongoing monitoring, and continuous improvement. 1301.2(b)(2); 642(c)(1)(E); 642(d)(2)
5. The policy council uses data and leverages its knowledge of the community effectively for program oversight, ongoing monitoring, and continuous improvement. 1301.3(c)(2); 642(c)(2)(D)

Monitoring and Implementing Quality Education and Child Development Services

Overview

Purpose

The grantee will demonstrate how their program provides high-quality early education and child development services to a diverse group of families and children, including children with disabilities and dual language learners, to promote children’s growth across the areas of development described in the Head Start Early Learning Outcomes Framework (HSELOF). The grantee will share their intentionality in selecting a curriculum (or curricula) that meets the needs of the population served and aligns with the HSELOF. The grantee also will demonstrate the oversight and support the program provides to ensure teaching staff design and implement lesson plans and use effective teaching practices that align with the curriculum.

Approach

Management staff will describe their rationale for selecting the curriculum and how it meets the needs of the children. Managers also will share the data they use to monitor the quality of classroom environments, teacher interactions, and professional development. Supervisors will share similar data for the classrooms they supervise and support. Reviewers will observe teachers to determine if they have designed lesson plans that align with the curriculum, and if they are implementing effective teaching practices, responsive care, organized learning environments, and learning experiences relevant to all children (including the full participation of children with disabilities and children who are dual language learners when applicable). A grantee-selected guide—typically a manager, program director, or center director who understands the curriculum implementation and staffing ratios—has the opportunity to elaborate on information discussed during the data tour. In addition, prior to classroom explorations, the grantee guide will share information about the classrooms reviewers visit (e.g., the assessment data used to individualize lesson plans and the unique needs of children in the classrooms observed). The grantee guide, along with the center director or supervisor, will accompany the reviewers on all of the classroom explorations. Parents will discuss their experiences as their children’s primary teachers and their engagement in their child’s education.

Federal Regulations

- 642(f)(3) Curriculum
- 1302.14(b) Children eligible for services under IDEA
- 1302.31(a)-(e) Teaching and the learning environment
- 1302.34 Parent and family engagement in education and child development services
- 1302.35(a)-(c);(e) Education in home-based programs
- 1302.45(a)(1);(b)(2) Support with managing challenging behaviors and other social, emotional, and mental health concerns
- 1302.61(a) Additional services for children with disabilities
- 1302.62 Additional services for parents of children eligible for services under the Individuals with Disabilities Education Act (IDEA)
- 1302.91(e)-(f) Staff qualifications and competency requirements
- 1302.92(a)-(b) Training and professional development
- 1302.101(a)-(b) Management system implementation and coordinated approaches
- 1302.102(b) Monitoring program performance
- 1302.102(c) Using data for ongoing improvement
- 1302.102(d) Reporting
- 1304.11(b) Steps toward achieving school readiness goals

Monitoring and Implementing Quality Education and Child Development Services

What We Want to Learn

Data Tour

- The grantee will demonstrate how the program uses data to ensure oversight and ongoing program improvement and to improve service delivery, child outcomes, and school readiness. The grantee will share:**
 - How the program monitors the effectiveness of teaching practices including curriculum implementation. 1302.102(b)
 - How the program uses aggregated child-level assessment data to identify training needs and professional development opportunities. 1302.102(c)-(d); 1304.11(b)(2)(i)
 - How the program uses information from ongoing monitoring data for continuous improvement including strengthening, adjusting, and adapting services, strategies, and goals to inform program decisions including changing or targeting scope of services. 1302.102(c)-(d)
 - Data supporting progress in achieving school readiness goals. 1302.102(c)
- The grantee will demonstrate how staff individualizes services for each child, integrating child assessment data into individual and group planning. Part of this demonstration should include:**
 - How the grantee analyzes and uses individual and aggregated child assessment data and input from parents and staff to:
1302.31(b)(1)(ii); 1302.31(b)(1)(iii); 1304.11(b)
 - Individualize learning experiences, lesson plans, teaching strategies, and services to best support each child.
 - Determine individual and group progress toward school readiness.
 - How parents learn about their child's development and progress and about the purpose and results of screenings and assessments. 1302.34(b)(6)
- The grantee will demonstrate how families of children with disabilities are engaged in their children's learning and development and are supported in becoming advocates for services that meet their children's needs. (1302.62)**
 - The grantee will describe how they collaborate with parents to help them become advocates for services that meet their children's needs including how the grantee:
 - Helps parents of children with disabilities in obtaining services.
 - Helps parents understand the referral, evaluation, and services timelines required under IDEA.
 - Supports parents' participation in the Individual Family Service Plan or Individualized Education Plan development process.
 - Helps parents understand the purpose of evaluations and ensuring their child's needs are addressed.
 - Assists parents in learning more about their children's disabilities and supporting the child's development.
 - The grantee will demonstrate that at least 10 percent of the program's total funded enrollment is filled by children eligible for services under IDEA, or that the grantee has received a waiver.

Monitoring and Implementing Quality Education and Child Development Services

What We Want to Learn (continued)

Teacher/Provider Discussion

4. **At the end of each learning environment observation, the reviewers will have a brief discussion with the lead teacher/provider to understand:**
 - How teachers implement the curriculum in the classroom. 1302.31(b)(1)
 - How teachers design individual and group lesson plans based on the curriculum. 1302.31(b)(1)(ii)
 - How the grantee provides feedback to staff to inform their ongoing development and improvement in their teaching practices. 1302.101(a)(2); 1302.101(b)
 - How teachers receive support in effective classroom management, (include strategies for supporting children with challenging behaviors and other social, emotional, and mental health concerns). 1302.45(a)(1); 1302.45(b)(2)
 - The type of training staff receives to help them plan individual and group lessons, activities, and schedules that align with the HSELOF and the curricula. 1302.31(c); 1302.92(b)
 - How teachers, home visitors, and parents are involved in sharing and using information on individual children to ensure children and families receive the necessary support to ensure progress toward school readiness. 1302.50(b)(6)
 - How the program ensures meeting the individualized needs of children with disabilities and providing all children access to and participation in the full range of services. 1302.61(a)

Home-based Program Exploration

5. The grantee will demonstrate how the home-based program service provides home visits and group socializations activities that:
 - Promote secure parent-child relationships. 1302.35(a)
 - Help parents provide high-quality early learning experiences. 1302.35(a)-(b)
 - Align with the HSELOF (home visits). 1302.35(c)
 - Include research-based strategies and activities for children who are dual language learners that recognize bilingualism and biliteracy as strengths. 1302.35(c)(4)
 - Provide age-appropriate activities for participating children that align intentionally to school readiness goals and the HSELOF (socializations). 1302.35(e)(2)

Monitoring and Implementing Quality Education and Child Development Services

Performance Measures

1. *The grantee uses data (e.g., data related to curriculum implementation, screenings and assessments, teaching practices, etc.) to ensure oversight and ongoing program improvement, effective service delivery, and child outcomes and school readiness. 1302.102(b)-(d)*
2. *The grantee fully engages children with disabilities in all aspects of the program, engages families of children with disabilities in their children's learning and development, and supports families in becoming advocates for services that meet their children's needs. 1302.61(a); 1302.62*
3. *Using a developmentally appropriate research-based curriculum that align with the HSELOF, the grantee has designed teaching practices and learning environments and has achieved progress in individual children's development and growth. 642(f)(3); 1302.31(a); 1302.31(b)(1)(i); 1302.31(b)(1)(ii); 1302.31(b)(1)(iii); 1302.31(b)(1)(iv); 1302.31(c)-(e); 1302.31(b)(2)*
4. *The grantee has demonstrated achievement of individual children's school readiness goals through effectively analyzing and using child-level assessment data to monitor children's individual progress and individualize services for children. 1304.11(b)(2)(ii)*
5. *The grantee has demonstrated achievement of program-level school readiness goals through effectively aggregating, analyzing, and using child-level assessment data to monitor program progress and inform program improvements. 1304.11(b)(2)(i)*
6. *The grantee ensures staff has the qualifications and skills, supervision and feedback, training, professional development, and support needed to provide quality education services that promote continuity of care for each child, promote progress toward program goals, and promote continuous program improvement. 1302.91(e)-(f); 1302.45(a)(1); 1302.45(b)(2); 1302.92(a)-(b); 1302.101(a)(2)*
7. *The grantee has demonstrated their home-based program provides home visits and group socialization activities, promotes secure parent-child relationships, and helps parents provide high-quality early learning experiences for their children. 1302.35(a)-(c) and (e)*

Monitoring and Implementing Quality Health Program Services

Overview

Purpose

Grantees will share how the program supports, implements, and monitors high-quality health program services that are developmentally, culturally, and linguistically appropriate to support children's growth and school readiness.

Approach

Management staff will share the data they use to monitor the quality of health services and to ensure health, mental health, and dental needs are met in a timely manner. Reviewers will ask managers, parents, and staff to demonstrate how the grantee monitors and maintains healthy and safe facilities and ensures environments for children and families are well maintained and support the desired outcomes for children. Additionally, staff will demonstrate the effectiveness of health and safety practices and discuss how these practices ultimately keep children and families healthy and safe.

Federal Regulations

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 Child mental health and social and emotional well-being
1302.46 Family support services for health, nutrition, and mental health
1302.47(b) Safety practices
1302.80 Enrolled pregnant women
1302.81 Prenatal and postpartum information, education, and services
1302.82 Family partnership services for enrolled pregnant women
1302.90(c) Standards of conduct
1302.101(a)-(b) Management system implementation and coordinated approaches
1302.102(b) Monitoring program performance
1302.102(c) Using data for ongoing improvement
1302.102(d) Reporting
Sec. 648A(g)(3) Staff recruitment and selection procedures: criminal record checks

What We Want to Learn

Data Tour

Child Health Status and Care

1. The grantee will demonstrate how the program effectively monitors and maintains timely information on children's health status and care including ongoing source of health care, preventive care, and follow-up. The discussion will include the following:
 - How the grantee uses their recordkeeping system to collect and track child health data. 1302.42(a)-(d); 1302.101(a)(4)
 - How the grantee identifies and addresses patterns or trends concerning late or missing child health information. 1302.101(a)(4)

Monitoring and Implementing Quality Health Program Services**What We Want to Learn (continued)***Data Tour (continued)***Child Health Status and Care (continued)***(Question 1 continued from previous page)*

1. The grantee will demonstrate how the program effectively monitors and maintains timely information on children's health status and care including ongoing source of health care, preventive care, and follow-up. The discussion will include the following:
 - How the grantee educates, supports, and collaborates with parents to ensure their child's health and well-being. 1302.41; 1302.46
 - How the grantee completes health determinations (i.e., onsite health professionals, community collaborations, etc.). 1302.42(b)
 - How the program implements and monitors its system for promoting effective oral health hygiene and nutrition services. 1302.43; 1302.44(a)
2. The grantee will show how the program uses its data—including both internal and external data (e.g., licensing)—to provide feedback to staff, inform stakeholders (e.g., governing body, policy council) of progress and issues, and inform continuous quality improvement in the program's health services.
 - The grantee will discuss how the program has used the information about patterns or trends in children's health needs, including their medical, oral health, mental health, and nutritional needs, as well as the need for ongoing and follow-up care. 1302.102(b)-(d)

Safety Practices

3. The grantee will share with the reviewers how the program ensures children are safe at all times by monitoring and maintaining the safety of all facilities, family child care settings, classrooms, equipment, and materials, as well as monitoring for safe and hygienic staff practices. 1302.47(b) In this discussion, the grantee will be asked to demonstrate how the program:
 - Analyzes and uses data from internal and external (such as licensing data) sources to understand program performance and ensure continuous improvement.
 - Has made progress in replacement, renovation, and repair of any facilities identified by the grantee with concerns.
 - Trains, supports, and monitors staff to ensure staff practice active supervision and abide by Head Start's standards of conduct.
 - Ensures completion of background checks on all staff in accordance with requirements. *(The grantee will demonstrate its system for tracking the completion of background checks prior to hire and will provide a copy of its background check tracking document. The reviewer will validate a small number of staff files).* Sec. 648A(g)(3)
4. The grantee will demonstrate how they know resources have been budgeted to support quality health program services and safe and healthy learning environments. 1302.101(a)(3)

Monitoring and Implementing Quality Health Program Services

What We Want to Learn (continued)

Parent and Staff Discussion

The reviewers will have discussions at different points in the review process with families, family services staff, and teachers to understand:

5. How the program supports a program-wide culture that promotes children's mental health, social, and emotional well-being. This includes:
 - Effectively utilizing mental health consultation to support education staff and other staff in meeting children's mental health and social and emotional needs. 1302.45(a)-(b)
6. The systems for working with enrolled pregnant women. This includes discussing how the program provides prenatal and postnatal education to pregnant women and their families, connects women to comprehensive services, develops family partnerships for pregnant women, and conducts newborn visits. 1302.80; 1302.81; 1302.82

Facilities Explorations

The onsite review includes an exploration of the program's facilities. The facilities exploration section is located in the fiscal section of the protocol.

Performance Measures

1. The grantee effectively collects, tracks, addresses, and shares information regarding each child's health status and health needs, including health, mental health, oral health, and nutritional needs. 1302.41; 1302.42(a)-(d); 1302.45(b)(1); 1302.46
2. The grantee maintains and monitors for effective oral health practices and nutrition services that meet the nutritional needs of and accommodates the feeding requirements of each child. 1302.43; 1302.44(a)
3. The grantee effectively utilizes mental health consultation to support staff, including home visitors, in identifying and meeting children's mental health and social and emotional needs. 1302.45
4. For programs serving pregnant women, the grantee provides and monitors for quality services that facilitate enrolled pregnant women's access to health care and provide information to support prenatal post-partum maternal and infant health and emotional well-being. 1302.80; 1302.81; 1302.82
5. The grantee has implemented a process for monitoring and maintaining healthy and safe environments, including providing meaningful feedback to staff and ensuring continuous improvements in health and safety practices as well as ensuring all staff has complete background checks. 1302.47(b); 1302.90(c); 1302.101(a)(2); Sec. 648A(g)(3)

Monitoring and Implementing Quality Family and Community Engagement Services

Overview

Purpose

The grantee will demonstrate how the program integrates family engagement and support strategies into all systems and provides program services to support family well-being and promote school readiness. The grantee will discuss how it uses data at the individual and program levels to promote progress toward family outcomes.

Approach

Management and family services staff will demonstrate how they use data to make overall improvement in family engagement and support services. Parents will discuss their experience with the program's family engagement and support services. (*Note: Services for families are embedded in each program area. Reviewers will use information learned from each program area to understand how the grantee integrates family engagement into all areas of programming.*)

Federal Regulations

- 1302.50 Family engagement approach
- 1302.52 Family partnership services
- 1302.90(d)(1) Communication with dual language learners and their families
- 1302.91(e)(7) Staff qualifications and competency requirements
- 1302.92(a)-(b) Training and professional development
- 1302.101(a)-(b) Management system implementation and coordinated approaches
- 1302.102(b) Monitoring program performance
- 1302.102(c) Using data for ongoing improvement
- 1302.102(d) Reporting

What We Want to Learn

Data Tour

1. **The grantee will demonstrate how they use data related to family engagement and support services to strengthen parent and family outcomes. The grantee should share:**
 - Family partnership services and outcomes data. 1302.52(b)-(c)
 - Data that demonstrate improvements in family engagement and support services. 1302.102(b)-(d)
 - How the program implements procedures for teachers, home visitors, and family support staff to ensure a coordinated family engagement strategy. 1302.50(b)(6)

Information captured in other service area data tours:

- *How the grantee engages parents in their child's education*
- *How the grantee collaborates with families of children with disabilities*
- *How the grantee educates, supports, and collaborates with parents to ensure their child's health and well-being*

Monitoring and Implementing Quality Family and Community Engagement Services

What We Want to Learn (continued)

Data Tour (continued)

2. **The grantee will demonstrate how the program implements a systematic approach to staff supervision, training, and professional development including:**
 - How the grantee trains staff on best practices in the implementation of family engagement strategies and support. 1302.92(b)(3)
 - How the grantee uses data collected through their system of ongoing supervision to provide feedback to staff to support their professional development. 1302.101(a)(2)
 - How the grantee ensures that staff, consultants, or contractors are familiar with ethnic backgrounds and heritages, and are able to communicate effectively with families. 1302.90(d)(1)
 - How the grantee ensures family services staff meet qualifications. 1302.91(e)(7)

Learning Environment Exploration

3. **Observe how the program creates a welcoming program environment that:**
 - Incorporates the unique cultural, ethnic, and linguistic background of families. 1302.50(b)(2)
 - Offers opportunities for ongoing two-way communication between staff and parents. 1302.50(b)(2)
 - Promotes intentional strategies to engage parents in their children's learning and development and engages fathers. 1302.50(b)(1)
 - Provides parents with the opportunity to participate in the program. 1302.50(b)(4)
 - Provides family engagement and support services in the family's preferred language, using interpreters to the extent possible. 1302.50(b)(5)

Family Services Staff and Parents Discussions

4. **The reviewers will have discussions at different points in the review process with families and/or family services staff and teachers to understand:**
 - The success of fully engaging families in all program services. 1302.50(a)
 - The success in engaging all staff in the family support process. 1302.50(a)
 - The program's progress in meeting family services staff qualifications. 1302.91(e)(7)
 - Confirmation of adequate resources to support family engagement and support services fully. 1302.101(a)(3)
 - How the grantee maintains a welcoming environment for parents and whether parents feel welcomed. 1302.50(b)(2)
 - Parent's engagement as their children's primary teacher and nurturer and the support of that role. 1302.50(a)
 - Parent's engagement in health services and their ability to fully support their family's health and well-being. 1302.50(a)

***Monitoring and Implementing
Quality Family and Community Engagement Services***

Performance Measures

1. *The grantee integrates family engagement and support strategies into all systems and demonstrates progress in providing quality program services to support family well-being and promote school readiness. 1302.50(a); 1302.50(b)(6)*
2. *The grantee uses family engagement and support services data to strengthen parent and family outcomes. 1302.102(b)-(d)*
3. *The grantee implements a systematic approach to staff hiring, supervision, training, and professional development. 1302.90(d)(1); 1302.91(e)(7); 1302.92(b)(3); 1302.101(a)(2)*
4. *The grantee creates welcoming, culturally, and linguistically responsive program environments. 1302.50(b)*
5. *The grantee collaborates with parents to identify strengths and needs and make progress toward individual family outcomes. 1302.52(b)-(c)*

Monitoring and Implementing Fiscal Infrastructure

Purpose

The grantee will demonstrate the program's development of their annual operating budget and strategies for the budget's implementation, adjustments, and accountability. This section highlights the program's intentionality in its fiscal capacity and management; how the program shares information with the director, managers, governing body, and policy council; and how the program uses data to make sound fiscal decisions and ensure fiscal and legal accountability.

Federal Regulations

Financial Infrastructure

75.303(b)-(d) Internal controls
642(c)(1)(E)(i) Governing body
642(c)(1)(E)(iv)(VII)(bb) Annual approval of the operating budget of the agency
642(c)(2)(D)(iv) Budget planning for program expenditures
1302.101(a)(1) Management system

Fiscal Capacity

75.403(a)-(g) Factors affecting allowability of costs
75.405(a)-(b) Allocable costs
75.408 Limitation on allowance of costs
75.414 Indirect (F&A) cost
75.430 Compensation: personal services
75.431 Fringe benefits
1302.91(c) Staff qualifications and competency requirements
1302.101(a)(3) Management system: budget and staffing
1303.5(a) Limitations on development and administrative costs
1303.46 Recording and posting notices of Federal interest
642(c)(1)(B)(i) Governing body composition
642(c)(1)(E)(iv)(VII)(cc) Auditor selection
647(a) Records and audits

Implementation of Fiscal Management Systems

1302.101(a)(4) Management system: automated accounting and record keeping system
1303.12 Insurance and bonding
1303.30 Grantee responsibility and accountability
1302.52(b) Insurance, bonding, and maintenance
75.317 Insurance coverage
75.302(b)(1)-(7) Financial management and standards for financial management systems
75.303 Internal controls
75.305(b)(1) Payment

Facilities

1302.47(b)(1)(ix) Safety practices

Monitoring and Implementing Fiscal Infrastructure

What We Want to Learn

Data Tour and Discussion

Financial Infrastructure

- How is the annual operating budget developed, implemented, and supported?
- What program information do program managers share with the fiscal manager to support development of the annual operating budget? 1302.101(a)(3)
- Describe the process for sharing data with the governing body and obtaining approval of the annual operating budget. 642(c)(1)(E)(iv)(VII)(bb)
- Describe the process for involvement of the policy council in budget planning for program expenditures. (*The reviewer should listen to ensure the program understands the different roles and responsibilities the governing body and policy council play with respect to the budget.*) 642(c)(2)(D)(iv)
- How does the grantee operationalize the budget—what information does the fiscal officer rely on to determine whether budgeted expenditures are supporting the accomplishment of program objectives?
- Describe the staffing and internal controls that support the grantee’s financial management system. 1302.91(c); 75.303(b)-(d)

Fiscal Capacity

- Describe the qualifications (experience and education) of the grantee’s fiscal officer primarily responsible for oversight of the Head Start/Early Head Start award. 1302.91(c)
- Who is the grantee’s designated individual with a background and expertise in fiscal management or accounting? Who is a member of or advisor to the governing body? 642(c)(1)(B)(i)
- Describe the grantee’s process for engaging an auditor, implementing audit recommendations, and sharing audit results with the governing body and other stakeholders. 642(c)(1)(E)(iv)(VII)(cc); 647(a)
- How has the grantee structured compensation, benefits, and professional development opportunities to recruit and retain qualified program and fiscal staff? 75.430; 75.431
- What systems does the grantee have in place to manage the budget to ensure costs are allowable and allocable, including shared costs? 75.403(a)-(g); 75.405(a)(2); 75.405(b); 75.414; 1303.5(a)
- How does the grantee ensure protection of the Federal interest in real property and equipment purchased in whole or in part with Federal funds? 1303.46

Implementation of Fiscal Management Systems

- Explain how the grantee’s financial management system, accounting, and reporting practices ensure compliance with laws, regulations, grant terms and conditions, reporting, and audit requirements. 75.302(b)(1-7); 1302.101(a)(4)
 - How does the grantee’s financial management system support ongoing fiscal operations? 75.302(b)(2)-(3)
 - What is the grantee’s system for determining whether individual expenses are necessary, reasonable, allocable, and adequately documented? 75.302(b)(7)

Monitoring and Implementing Fiscal Infrastructure

What We Want to Learn (continued)

Implementation of Fiscal Management Systems (continued)

- How does the grantee ensure payment of allowable program expenses promptly and within the appropriate budget period? 75.305(b)(1); 75.302(b)(4)
- Describe the process the grantee uses to identify risks and obtain cost-effective insurance for those identified risks. 1303.12; 1303.52(b); 75.317
- If applicable, how does the grantee provide oversight to their delegate agencies and ensure the provision of high-quality services to children and families? 1303.30

Facilities Exploration

All reviewers on the team are responsible for reporting the condition of facilities. As part of the onsite review, all reviewers will use the following guide when visiting facilities. The fiscal reviewer will visit a sample of facilities that are new, renovated, or have unusual maintenance cost and will complete a facilities condition list to understand the physical condition of the facilities and any plans for addressing concerns.

- **Request a copy of the grantee's preventative facility maintenance schedule (and equipment inventory) and review a copy of the most recent licensing report for each of the grantee's facilities (if licensing is applicable). For American Indian/Alaska Native programs, review their Indian Health Services annual Environmental Health and Safety report along with or in lieu of licensing reports. The fiscal reviewer should use these reports to determine additional facility visits.**
 - Take pictures of all centers visited (capture exterior of facilities, classrooms, playgrounds, and general areas).
 - Provide detailed descriptions of aging facilities or concerns with facilities that include obvious or reported structural damage, cracks in walls or foundations, plumbing or ceiling leaks, gaps around windows and doors, and inadequate heating, cooling, lead, mold, etc.
 - Make note of any facilities, or areas of facilities, where it appears children should not receive services due to dangerous or hazardous environmental or structural conditions that threaten their well-being or ability to learn and develop successfully.
 - Ensure each facility meets licensing requirements. 1302.47(b)(1)(i)
 - Determine if ongoing and routine maintenance is adequate (clean and free of pests and pollutants, and prevents injury). 1302.47(b)(1)(ii)–(viii)
- **The fiscal reviewer will review the preventative facility maintenance schedule and inventory to: 1302.47(b)(1)(ix)**
 - Determine if there are large and/or unusual maintenance costs and why.
 - Identify facilities and equipment (kitchen equipment, heating and cooling systems, hot water heater) that are near the end of their useful life or require ongoing maintenance.
 - Gather information about aging facilities that need replacement or major repair.
 - Review budgeted resources to support quality safe and healthy learning environments.
 - Learn how the grantee ensured sufficient staffing and resources to ensure facilities, equipment and materials are safe, including providing routine monitoring for compliance and correction of any safety risks or concerns.

Monitoring and Implementing Fiscal Infrastructure**Performance Measures****Fiscal Infrastructure**

1. *The governing body has an approach for approving financial management, accounting, reporting policies, and compliance with laws and regulations, and has a strategy for ensuring annual approval of the operating budget of the agency and for ensuring the use of shared data for administering and overseeing programs while safeguarding funds. 642(c)(1)(E)(i); 642(c)(1)(E)(iv)(VII)(bb)*
2. *The grantee has an approach for ensuring the policy council is involved in budget planning for program expenditures, including policies for reimbursement and effective participation in policy council activities. 642(c)(2)(D)(iv)*
3. *The grantee has an approach for maintaining a program, fiscal, and human resource management structure that provides effective management and oversight of all program and fiduciary areas of responsibility to ensure accomplishment of program objectives. 1302.101(a)(1)*

Fiscal Capacity

4. *The grantee has a strategy for ensuring the budget and staffing patterns respond to changes effectively that promote continuity of care for all children enrolled, allow for sufficient time needed to participate in training and professional development, and allow for provision of the full range of services. 1302.101(a)(3)*
5. *The grantee maintains and monitors a system to manage the budget to ensure that cost are allowable and allocable, including shared costs. 75.403(a)-(g); 75.405(a)(2); 75.405(b); 75.414; 1303.5(a)*
6. *The grantee has a system for ensuring the protection of Federal interest in real property purchased with Federal funds. 1303.46*
7. *The grantee has an approach for maintaining a system for compensation, benefits, and professional development opportunities to recruit and retain qualified program and fiscal staff to ensure high-quality service delivery. 1302.91(c); 75.430; 75.431*
8. *The grantee maintains financial records and supporting documentation necessary to facilitate effective audits. 647(a)*

Monitoring and Implementing Fiscal Infrastructure**Performance Measures (continued)****Implementation of Fiscal Management Systems**

9. *The grantee has a financial management system and accounting and reporting practices that support ongoing fiscal operations and enable the grantee to remain in compliance with laws, regulations, grant terms and conditions. 75.302(b)(1)-(7); 1302.101(a)(4)*
10. *The grantee ensures payment of allowable program expenses promptly and within the appropriate budget period. 75.305(b)(1)*
11. *The grantee has a process to identify risks and obtain cost-effective insurance for those identified risks. 1303.12; 1303.52(b); 75.317*
12. *The grantee is accountable for the services their delegate agencies provide and ensures provision of high-quality services to children and families. 1303.30*

Facilities

13. *The grantee has sufficient staffing and resources to ensure that facilities, equipment and materials are safe, including providing routine monitoring for compliance and correction of any safety risks or concerns. 1302.47(b)(1)(ix)*

Monitoring ERSEA: Eligibility and Attendance

Purpose

This section focuses on how the grantee ensures compliance with Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) program requirements. Specifically, the grantee will coordinate child files to enable the reviewers to monitor that eligible children and families are receiving Head Start services. The grantee also will demonstrate how the program monitors, tracks, analyzes, and uses child attendance data to support families in promoting individual child attendance and support the program in managing systematic program attendance issues.

Federal Regulations

1302.12 Determining, verifying, and documenting eligibility
1302.16 Attendance

What We Want to Learn

1302.12 Determining, verifying, and documenting eligibility

1. The reviewers will review a sample of files of enrolled children to review the program's eligibility determinations, including the supporting documentation used to verify eligibility.

Defined eligibility requirements include:

- Family income is equal to or below the poverty line.
- Family or child is receiving or is eligible to receive public assistance (Supplemental Security Income and Temporary Assistance for Needy Families).
- Child is homeless.
- Child is in foster care.

Additional income eligibility includes:

- Ten percent of children enrolled in the program may be above 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: For tribal programs, there are additional allowances provided under 1302.12(e).

Monitoring ERSEA: Eligibility and Attendance**What We Want to Learn (continued)****1302.16 Attendance**

2. The grantee will share their system for tracking child attendance data with the reviewer and will describe how the program monitors individual child attendance and the program's monthly average daily attendance. This will include providing examples of how the program:
 - Ensures children are safe when they are absent from the program.
 - Collaborates with parents to provide support and promote their children's attendance in the program.
 - Monitors monthly average daily attendance rate data and implements timely changes, where needed, to address systematic issues that impact children's attendance in the program.

Performance Measures

1. *The grantee enrolls children who are categorically eligible or who meet defined income-eligibility requirements based on Head Start requirements. 1302.12*
2. *The grantee monitors and uses attendance data to support families in promoting individual child attendance and to inform program improvements where monthly attendance rates indicate systematic attendance issues. 1302.16*