FY 2019 Focus Area Two Monitoring Protocol

Purpose
The Focus Area Two (FA2) review 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 the Office of Head Start’s (OHS) 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 the Head Start Act.

Road Map to the Focus Area Two Protocol
This protocol will guide the discussions between the grantee and reviewers during the FA2 review. It includes areas of discussion, specific performance measures, and the associated Federal regulations. The protocol is divided into the following six sections:

- Program Management and Quality Improvement
- Education and Child Development Services
- Health Program Services
- Family and Community Engagement Services
- Fiscal Infrastructure
- Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)

Federal Regulations
Each section of the protocol includes a list of Federal regulations grounding the discussions. This list ensures transparency regarding the regulations used to assess grantee performance. Grantees should note that they remain accountable for all of the HSPPS as well as 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 methodologies reviewers will use to learn about grantee performance (e.g., data tours, explorations of classrooms, discussions with managers, teachers, parents, and the governing body). 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. They also allow grantees to describe the challenges they have experienced, the strengths they have developed, 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 the 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 focus of the monitoring protocol. Each performance measure indicates the Federal regulations associated with that measure.
Focus Area Two Review Information

Grantees participating in the FA2 review will receive notification (60-day letter) of the upcoming review. The assigned Review Lead will contact the grantee following the notification and will partner with the grantee to prepare for the review (planning call). The grantee must provide an updated child list, this list will determine the sample for the ERSEA child file review. During the week prior to the onsite review, the Review Lead will provide the classroom exploration sample that is determined based on the classrooms entered in HSES.

The review team responsible for conducting the FA2 review consists of a Review Lead, a fiscal reviewer, and two FA2 reviewers. The team size may vary depending on the size of the grantee. The FA2 review includes, but is not limited to, the ERSEA Child File Review, Data Tours, Center and Classroom Explorations, Management Team Discussions, Teacher Discussions, Governing Body and Policy Council Discussions, Parent Discussions, and Fiscal Explorations. The review team will meet the grantee’s management staff the morning of the first day of the review. This management team meeting allows the review team to build on knowledge learned from the pre-site document review (grant application, PIR data, etc.) and conversations with the Regional Office.

Data tours start on the first day and allow the review team to understand the types of data the grantee collects to inform ongoing continuous improvement. Program leadership and the program managers overseeing health, fiscal, education, and family services will demonstrate how data are used and how each service area collaborates to ensure the provision of quality services. The ERSEA child file review also occurs on the first day of the review; a grantee guide is requested to ensure the child file review goes smoothly.

Service area explorations continue through the week. Reviewers visit classrooms, discuss service delivery, and explore fiscal management. The grantee will assign guides to each reviewer conducting classroom explorations. The guides will provide information that further explains what the reviewer is observing in the classroom. Discussions will occur with families, direct service staff, the director, managers, the governing body, and the policy council to gain further insight about how children and their families are supported.

New this fiscal year, the monitoring review will collect information on child outcomes related to the kindergarten assessment conducted in the receiving schools. Head Start services focus on the whole child, and it is important for programs to provide intentional programming that results in children being ready for kindergarten. Programs will discuss school readiness goals that ensure children are ready for kindergarten and the results from the kindergarten assessment.

Reviewer Consistency:

All reviewers are trained on the implementation of the protocol. They are trained to have grantee lead discussions related to the topics in each section and collect data based on the standards that are the focus of that section. The reviewers are trained to capture what the program shares about each of the topics and to gather information about the grantee’s description of how they met the standards.
Program Management and Quality Improvement

Overview

The Program Management and Quality Improvement discussion with the management team begins on the first day of the FA2 review event. The grantee will describe and demonstrate how it implements its program management system to promote quality improvement. During the data tours, the review team will review data and have discussions with program management staff about the program’s progress, implementation, success, and risks.

The Program Management and Quality Improvement section of the protocol includes three areas: program management, ongoing oversight and continuous improvement, and program governance. The review team will measure the ability of the Director and the management team to deliver high-quality services, continuously monitor program services, make improvements as needed, and achieve program goals. The review team will also monitor the engagement of the governing body and policy council.

Federal Regulations

1301.2 Governing body use of information and data
1301.3 Policy council use of information and data
1302.91(a) Staff qualifications and competencies
1302.92(b) Staff 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
642(c)(1)(E)(ii) Governing body responsibilities
642(c)(1)(E)(V)(bb) Governing body responsibilities
642(c)(2)(D)(i) Policy Council responsibilities

What We Want to Learn

Program Management

PM 1: The grantee establishes a management structure that consists of staff, consultants, or contractors who ensure high-quality service delivery; have sufficient knowledge, training, experience, and competencies to fulfill the roles and responsibilities of their positions; and provide regular supervision and support to staff.

1. The grantee will demonstrate how the management team members use their knowledge, training, experience, and competencies to ensure high-quality service delivery. 1302.91(a)
2. The grantee will demonstrate how the management/organizational structure provides effective management and oversight of all program areas. 1302.101(a)(1)
3. The grantee will demonstrate how managers provide ongoing supervision and professional development to support individual staff. 1302.101(a)(2), 1302.92(b)
Ongoing Monitoring and Continuous Improvement

PM 2: The grantee uses data to identify program strengths, needs, and areas needing improvement; to evaluate progress toward achieving program goals and compliance with program performance standards, and to assess the effectiveness of professional development.

1. The grantee will demonstrate how data are aggregated, analyzed, and compared to inform strategies for continuous improvement in all service areas and to identify risk. 1302.102(c)(2)(i)
2. The grantee will demonstrate how information is used for ongoing monitoring and improvement of teaching practices, child-level assessments, family outcomes, health and safety practices, and other comprehensive services. 1302.102(c)(2)(iv)
3. The grantee will demonstrate how information is provided to the Director and across the management team to support coordination between services.
4. The grantee will demonstrate how the program evaluates progress toward meeting program goals. 1302.102(b)(1)(i)

Program Governance

PM 3: The grantee maintains a formal structure of program governance to oversee the quality of services for children and families and to make decisions related to program design and implementation.

1. The governing body members will demonstrate how they have adopted practices that ensure active, independent, and informed governance of the Head Start agency. 642(c)(1)(E)(ii)
2. The governing body members will demonstrate how they use data (both program data and external information) to oversee the provision of quality services for children and families and to ensure progress toward school readiness. 1301.2(b)(2)
3. The governing body members will discuss how they oversee the agency’s progress in carrying out programmatic provisions of the agency’s grant application. 642(c)(1)(E)(iv)(V)(bb)

PM 4: The grantee’s policy council is engaged in the direction of the program, including program design and planning of goals and objectives.

1. The policy council members will demonstrate how they submit activities to support active involvement of parents in program operations and how they ensure the agency is responsive to community and parent needs. 642(c)(2)(D)(i)
2. The policy council members will describe the type of information they use to ensure the program is delivering quality services and to actively participate in the direction of the program. 1302.102(d)

Note: The fiscal responsibilities of the governing body and policy council are addressed under the fiscal section of the protocol.
Overview

The Quality Education and Child Development Services section has a new focus: “Alignment with School Readiness.” The grantee will describe how the program’s school readiness efforts align with the expectations of the children’s receiving schools and if they have information from the kindergarten readiness assessment of the receiving schools. The OHS wants to capture rich data around this topic area. The openness of the questions gives grantees the opportunity to describe how their school readiness and transition efforts are based on the needs of the children enrolled in their program.

The Quality Education and Child Development Services section explores four areas: school readiness efforts, teaching practices that promote progress toward the next learning environment, the support for teachers in school readiness efforts, and the quality of home-based services. These sections are interrelated and collectively provide information about the program’s ability to prepare children for their next learning environment.

Federal Regulations

1302.31(b)(1) Effective teaching practices
1302.31(b)(2) Strategies for dual language learners
1302.31(e) Promoting learning through approaches to rest, meals, routines, and physical activity
1302.32(a)(2) Curricula
1302.33(b)(1)(2) Assessment for individualization
1302.35(a), (c), (e) Education in home-based programs
1302.45(a)(1) Support with managing challenging behaviors and other social, emotional, and mental health concerns
1302.45(b)(2) Mental health consultants
1302.61(a) Additional services for children with disabilities
1302.70(a) Transitions from Early Head Start
1302.71(a) Transitions from Head Start to Kindergarten
1302.71(d) Learning environment activities
1302.91(e) Staff Qualifications
1302.92(b)(5) Training and Professional development
1302.92(c)(1) Coaching
1302.102(a)(3) School readiness goals
1302.102(c)(2)(ii)-(iii) Using data for continuous improvement

What We Want to Learn

Alignment with School Readiness

PM 1: School readiness efforts align with the expectations of receiving schools*, the Head Start Early Learning Outcomes Framework (HSELOF), and state early learning standards.

*Receiving schools refers to programs or schools where enrolled children will attend upon completing the Early Head Start or Head Start programs.
1. The grantee will describe how the program’s school readiness efforts align with the expectations of receiving schools, the HSELOF, and the state early learning standards. 1302.102(a)(3)

2. The grantee will explain the expectations of the receiving schools and collaborations to promote successful transitions to kindergarten. 1302.71(a)

3. The grantee will demonstrate how the program implements strategies and practices to support successful transitions for children and families out of Early Head Start. 1302.70(a)

4. The grantee will describe the data used to show that children are ready to meet the expectations of receiving schools. 1302.102(c)(2)(ii)-(iii), 1302.33(b)(1)

5. The grantee will explain the expectations of the kindergarten readiness assessment of the receiving schools.

6. The grantee will discuss if the program obtains kindergarten entry assessment data on Head Start children entering the receiving schools.

Note: The information on kindergarten readiness assessment (questions #5 and #6) is used for OHS data collection purposes only to inform policy and training and technical assistance directions.

Effective and Intentional Teaching Practices
PM 2: Teaching practices intentionally promote progress toward school readiness and provide high-quality learning experiences for children.

1. The grantee will demonstrate how organized activities, schedules, lesson plans, and learning experiences are responsive to the children’s individual developmental patterns and progressions as described in the HSELOF. 1302.31(b)(1)(ii)

2. The grantee will demonstrate how teachers individualize for children, including those who are not making progress toward school readiness. 1302.33(b)(2)

3. The grantee will demonstrate how teachers create nurturing and responsive learning environments for children, including ensuring environments promote critical thinking and problem solving, encourage children’s engagement, and are communication and language rich. 1302.31(b)(1)(i)

4. The grantee will share and demonstrate how teachers support child-teacher interactions, socialization, development, and learning at all times, including daily routines and mealtimes. 1302.31(e)

5. The grantee will demonstrate how teachers ensure the full inclusion of children with disabilities. 1302.61(a)

6. The grantee will demonstrate how the strategies and activities teachers use recognize bilingualism and biliteracy as strengths for children who are dual language learners. 1302.31(b)(2)

7. The grantee will demonstrate the strategies that teachers use to promote successful transitions for children to kindergarten. 1302.71(d)

8. The grantee will demonstrate how teachers are supported in providing effective classroom management and positive learning environments. 1302.45(a)(1)

Supporting Teachers in Promoting School Readiness
PM 3: The grantee ensures teachers are prepared to implement the curriculum and support children’s progress toward school readiness.

1. The grantee will demonstrate how the program assists education staff in using data to individualize learning experiences to improve outcomes for all children. 1302.92(b)(5)

2. The grantee will demonstrate how the program supports staff in effectively implementing curricula, monitoring curriculum implementation, and ensuring fidelity. 1302.32(a)(2)

3. The grantee will demonstrate how the program identifies strengths, areas of needed support, and which staff would benefit from intensive coaching for all education staff. 1302.92(c)(1)
4. The grantee will demonstrate how the mental health consultant supports teaching practices through strategies to address teacher and individual child needs. 1302.45(b)(2)

5. The grantee will demonstrate that teachers have the appropriate qualifications. 1302.91(e)(1-2)

**Home-Based Program Services**

PM 4: The grantee ensures home-based program services provide home visits and group socialization activities that provide high-quality learning experiences.

1. The grantee will demonstrate how the home-based program services:
   a. Promote secure parent-child relationships and help parents provide high-quality early learning experiences. 1302.35(a)
   b. Provide developmentally appropriate, child-focused learning experiences that promote parents’ abilities to support their children’s development and align intentionally to school readiness goals and the HSELOF (home visits and socializations). 1302.35(c); 1302.35(e)(2)
   c. Include research-based strategies and activities that recognize bilingualism and biliteracy as strengths for children who are dual language learners. 1302.35(c)(4)
Monitoring and Implementing Quality Health Services

Overview

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. 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 the grantee to demonstrate how the program 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. Five areas are measured in this section: timely health care and follow-up, mental health consultation, oral health and nutrition, safety, and services to pregnant women.

Federal Regulations

1302.41(a) 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(a) Wellness promotion
1302.45(b) Mental health consultants
1302.47(b) Safety practices
1302.80 Enrolled pregnant women
1302.81 Prenatal and postpartum information, education, and services
1302.90(c) Standards of conduct
Sec. 648A(g)(3) Staff recruitment and selection procedures: criminal record checks

What We Want to Learn

Child Health Status and Care

PM 1: The grantee effectively monitors and maintains timely information on children’s health status and care, including ongoing source of health care, preventive care, and follow-up.

1. Does the grantee ensure children are up to date on a schedule of age-appropriate medical and oral health care (EPSDT)? 1302.42(b)(1)(i)
2. Does the grantee ensure ongoing care and extended follow-up care? 1302.42(c)-(d)
3. Does the grantee ensure that each child has an ongoing source of continuous health care? 1302.42(a)(1)
4. Does the grantee educate, support, and collaborate with parents to share information about child’s health and well-being? 1302.41(a)

During the health data tour, the grantee will describe and demonstrate how the program:
- Monitors and maintains child health-related information
- Supports parents in understanding information about their children’s health and well-being.
Mental Health

PM 2: The grantee supports a program-wide culture that promotes mental health and social and emotional well-being, and uses mental health consultation to support staff.

1. Does the grantee ensure mental health consultation is available to partner with staff and families in a timely and effective manner? 1302.45(a)(2)
2. Does the Mental Health Consultant assist the grantee in implementing strategies to identify and support children with mental health and social and emotional concerns? 1302.45(b)(1)
3. Does the grantee use mental health consultant(s) to support children, staff, and families in meeting mental health and social and emotional needs? 1302.45(b)(3)

Oral Health and Nutrition

PM 3: The grantee maintains and monitors for effective oral health practices and nutrition services that meet the nutritional needs and accommodate feeding requirements and allergies.

1. Does the grantee promote effective oral health hygiene by ensuring children with teeth are assisted in brushing their teeth once a day? 1302.43
2. Does the grantee implement nutrition services that are culturally and developmentally appropriate, including meeting the nutritional and feeding needs of babies and young children? 1302.44(a)(1)
3. Does the grantee post individual child food allergies prominently where staff can view wherever food is served? 1302.47(b)(7)(vi)

Safety Practices

PM 4: The grantee has implemented a process for monitoring and maintaining healthy and safe environments. This includes ensuring all staff have complete background checks.

1. The grantee will demonstrate how the program keeps all facilities safe through an ongoing system of preventive maintenance. 1302.47(b)(1)(ix)
2. The grantee will demonstrate how the program keeps all equipment and materials safe through an ongoing system of preventive maintenance. 1302.47(b)(2)(v)
3. The grantee will demonstrate how the program maintains a system for ensuring appropriate safety practices.
4. Does the grantee report suspected or known child abuse and neglect? 1302.47(b)(5)(i)
5. Does the grantee ensure safe sleep practices? 1302.47(b)(5)(ii)
6. Does the grantee ensure appropriate indoor and outdoor supervision? 1302.47(b)(5)(iii)
7. Does the grantee only release children to an authorized adult? 1302.47(b)(5)(iv)
8. Does the grantee prevent maltreatment or endangerment of children? 1302.90(c)
9. The grantee will describe its method for ensuring all staff have completed the background checks prior to hire (If staff are not ensuring staff receive background checks prior to hire, please note the reasons why and how many staff did not get the CRC before hire and review the written documentation they have to validate all staff have the required checks.) List all staff that did not have a background check. Sec. 648A(g)(3)
Services to Pregnant Women

PM 5: 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, postpartum, maternal, and infant health and emotional well-being.

1. The grantee will describe how the program connects women to comprehensive services and conducting newborn visits. 1302.80
2. The grantee will describe how the program provides prenatal and postnatal education, supports parents during pregnancy, and works to reduce stress and maternal depression. 1302.81
Monitoring and Implementing
Quality Family and Community Engagement Services

Overview

The grantee will demonstrate how the program provides quality family and community engagement services. The review team will learn how the program provides services to support family well-being and promote school readiness. Management and family services staff will describe how they support families in making progress toward their life goals. Parents will discuss their experience with the program’s family engagement and support services. Reviewers will use information learned from each program area to understand how the grantee integrates family engagement into all areas of programming. Three areas are measured in this section: family well-being, strengthening parents, and parent engagement in education.

Federal Regulations

1302.34(b) Engaging parents and family members
1302.45(b) Mental health consultants
1302.46(b) Family support services for health, nutrition, and mental health
1302.50 Family engagement approach
1302.51 Parent activities to promote child learning and development
1302.52 Family partnership services
1302.53 Community partnerships
1302.62(b) Parents of children eligible for services under IDEA
1302.71(b) Family collaborations for transitions

What We Want to Learn

Family Well-Being

PM 1: The grantee collaborates with families to support family well-being, parents’ aspirations, and parents’ life goals.

1. The grantee will demonstrate how the program supports family goal setting and tracks family strengths, needs, and progress toward goals. 1302.52(c)(3)
2. The grantee will demonstrate how the program provides resources that support family well-being, either within the program or through community partnerships.
   a. Does the grantee provide economic mobility resources to help families with pathways out of poverty (including educational, vocational, and employment opportunities; budgeting; debt counseling; tax credits; savings accounts; etc.)? 1302.50(b)(3)
   b. Does the grantee provide health and mental health resources (including health insurance or referrals for parental depression, domestic violence, substance misuse, etc.)? 1302.45(b)(5)
   c. Does the grantee provide resources and support for families experiencing homelessness? 1302.53(a)(2)(vi)

Strengthening Parenting and Parent-Child Supports

PM 2: The grantee provides services that strengthen parent-child relationships and support parents in strengthening parenting skills.

1. The grantee will describe its family engagement strategies and how they are designed to foster parental confidence, including opportunities to connect with other parents. 1302.51(a)
2. The grantee will describe how the program offers parents the opportunity to practice parenting skills, build on their knowledge, and participate in a parenting curriculum. 1302.51(b)
Family Engagement in Education and Child Development Services
PM 3: The grantee’s education and child development services recognize parents’ roles as children’s lifelong educators and encourage parents to engage in their child’s education.

1. The grantee will describe how the program helps parents support the learning and development of their children. 1302.50(b)(1)
2. The grantee will describe how the program shares information with parents about their child’s development and the types of information the grantee gathers from parents about their child’s development. 1302.34(b)(2)
3. The grantee will describe how the program supports families in their transition into and out of Head Start. 1302.71(b)(2)
4. The grantee will describe how the program prepares parents to advocate for their child. 1302.71(b)(1)
5. The grantee will describe how the program supports parents of children with disabilities. 1302.62(b)
6. The grantee will describe how the program supports parents in promoting the social and emotional development of their child. 1302.46(b)(1)
The grantee will demonstrate the program’s development of its 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

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### What We Want to Learn

#### Budget Planning and Development

**PM 1:** The grantee develops and implements its budget to sustain management, staffing structures, and the delivery of services that support the needs of enrolled children and families. This entails relating financial data to accomplishments of the grant award and an awareness of program progress, lessons learned, and needed improvements.

1. The grantee will describe how it takes into account the program’s goals and objectives when developing the budget to ensure the provision of comprehensive services and the continuity of care. 1302.101(a)(3)

To address this performance measure, the grantee will demonstrate how its budget development and approval process reflect the awareness of fiscal staff, the governing body, and the policy council of the goals and objectives of the program. The grantee will also demonstrate that program objectives, progress, and experiences are taken into account in making budget decisions. Ultimately, the grantee’s budget must support the program in delivering comprehensive, quality services to enrolled children and families.
2. The grantee will describe the governing body’s process for reviewing and approving the annual operating budget. This includes:
   a. What the governing body considers when addressing how funds are distributed across line items in the operating budget. 642(c)(1)(E)(iv)(VII)(aa)
   b. The governing body’s role in approval of the annual operating budget. 642(c)(1)(E)(iv)(VII)(bb)
   c. How the decision-making process of the governing body was supported by adequate information and training provided by the grantee. 642(d)(2)(A)-(l), 642(d)(3)
   d. How the fiscal representative contributes to the governing body’s ability to make informed financial decisions. 642(c)(1)(B)(l)

3. The grantee will describe the policy council’s engagement in the budget process, including:
   a. The policy council’s role in the budget process. 642(c)(2)(D)(iv)
   b. How the grantee ensures that policy council members receive financial data and understand how to interpret fiscal data to assist in budgetary decision-making. 642(d)(2)(A)-(l), 642(d)(3)

4. The grantee will explain how the budget development and approval process demonstrate that program goals and objectives are taken into account to set priorities and make trade-offs showing the program intentionally allocated resources to its highest priority goals and objectives. 1302.102(b)(1)(iii)

Ongoing Fiscal Capacity

**PM 2: The grantee plans and implements a fiscal management system that supports the organization’s ongoing capacity to execute its budget over time and meet the needs of its organization.**

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The grantee’s fiscal capacity includes having fiscal staff and governing body representation that have the experience and capacity to support the program, given the level of fiscal complexity of its grant(s). Fiscal capacity also includes ensuring governing body and policy council are supported in receiving and understanding financial information to enable them to make informed decisions and ensuring sufficient insurance and internal controls to protect the program’s funding, assets, and interests.

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1. The grantee will describe the fiscal complexity of the program (i.e., multiple funding sources, numerous and widespread locations, number of HS/EHS grants, delegates, facilities) and how the training, experience, and qualification of the fiscal officer are appropriate for the complexity of the program. 1302.91(c)

2. The grantee will describe how it identifies, assesses, and addresses risks such as natural disasters, child injury, and electronic theft, including insurance coverage, bonding, systems improvement, and other risk reduction measures that the grantee has put in place. 1303.12; 1303.52(b)

3. The grantee will describe the staffing and internal controls that support the program’s financial management system. 75.303(a), (b), and (e)
Budget Execution

PM 3: The grantee’s financial management system provides for effective control over and accountability for all funds, property, and other assets.

1. **Personnel Compensation and Fringe Benefits.** The grantee will demonstrate its ability to manage personnel compensation and fringe benefits.
   - a. Are wages comparable and do they meet the program’s needs for recruitment and retention of qualified staff? 75.302(b)(4)
   - b. Does the grantee identify and account for indirect costs? 75.414
   - c. Does the grantee accurately track the time of non-exempt employees? 75.430(i)
   - d. Does the grantee ensure allocable personnel costs are shared across programs relative to the benefit received by each program? 75.405(a)
   - e. Does the grantee effectively manage its Head Start funds to ensure that funds are used only for authorized purposes? 75.302(b)(4)
   - f. Are Head Start funds used only for expenses associated with authorized Head Start activities? 75.302(b)(3)
   - g. Are funds drawn down in relation to immediate cash needs and is the time between when funds are drawn down and payments are made minimized to ensure timely payment to vendors and contractors? 75.305(b)(1)
   - h. Is the grantee liable for any fines, late fees, or penalties related to its function as an employer (e.g., IRS Department of Labor, workers compensation, unemployment insurance)? 75.441
   - i. Does the grantee evaluate and monitor personnel and other fiscal operations to ensure compliance with laws, rules, regulations, and terms of the award? 75.303(c)
   - j. Has the grantee taken action to address any identified areas of noncompliance? 75.303(d)

2. **Procurement.** The grantee will describe the program’s system for determining whether individual expenses are necessary, reasonable, allocable, and adequately documented.
   - a. Does the grantee have a process for the purchasing and contracting of goods and/or services? 75.302(b)(7)
   - b. Does the grantee ensure all purchases and contracts meet the criteria affecting allowability? 75.403(a)-(g)
   - c. Does the grantee ensure there are an adequate number of qualified vendors to demonstrate required competition for micro-purchases (currently $3,500), small purchases ($3,500 to $150,000) 75.329(a)-(b), and purchases over the simplified acquisition threshold (currently $150,000)? 75.332
   - d. Does the grantee ensure it only makes purchases from, and contracts with, qualified vendors? 75.327(h)
   - e. Does the grantee exclude members of the governing body, staff, or family members as vendors? 75.328(a)(4)(5)(7)
   - f. When the grantee approves purchases and contracted services, does it ensure free and open competition? 75.328(b)?
Facilities and Equipment
PM 4: The grantee complies with application, prior approval, and reporting requirements for facilities purchased, constructed, or renovated with Head Start funds.

1. If Head Start funds have been used to make mortgage payments, fund renovations in excess of $250,000 for a single facility, purchase a facility outright (land, building, modular unit), make a down payment, or construct a new facility, the grantee will describe:
   a. How the grantee ensured it received prior ACF approval for use of funds. 75.308(c)(1)(xi)
   b. How the grantee filed or posted a notice of federal interest that reflects the use of funds. 1303.46(b)(1)-(4)

2. The grantee will demonstrate how the program maintains a complete inventory of all equipment purchased in whole or in part with Head Start funds. 75.320(d)(2)
Monitoring ERSEA: Eligibility, Selection, Enrollment, and Attendance

Overview

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 to support the program in managing systematic program attendance issues.

Federal Regulations

1302.12 Determining, verifying, and documenting eligibility
1302.14(b) Children eligible for services under IDEA
1302.15 Enrollment
1302.16 Attendance

What We Want to Learn

Determining, verifying, and documenting eligibility

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.

PM 1: The grantee enrolls children or pregnant women who are categorically eligible or who meet defined income-eligibility requirements.

1. The grantee will demonstrate how the program maintains child files with an eligibility record that includes the child’s eligibility category, documentation that staff completed an in-person or phone interview with the family, and the documents used to determine eligibility for each child or pregnant woman. 1302.12(k)
2. The grantee will demonstrate how the program enrolls children who are categorically eligible or who meet defined income-eligibility requirements. 1302.12(c) 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 criteria include:

- 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).
PM 2: At least 10 percent of the grantee’s total funded enrollment is filled by children eligible for services under IDEA or the grantee has received a waiver.

1. 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. 1302.14 (b)

**Attendance**

PM 3: The grantee monitors and uses attendance data to support families in promoting individual child attendance and inform program improvements where monthly attendance rates indicate systematic attendance issues.

1. The grantee will share the 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.
   a. The grantee will describe how the program ensures children are safe when they are absent from the program. 1302.16(a)(1)
   b. The grantee will describe how the program collaborates with parents to provide support and promote their child’s attendance in the program. 1302.16(a)(2)
   c. The grantee will describe how 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. 1302.16(b)

**Enrollment**

PM 4: The grantee sends accurate monthly enrollment numbers to HSES.

1. The grantee will demonstrate how it calculates the monthly enrollment data sent to HSES. 1303.15(a)
   a. The grantee will demonstrate how its supporting enrollment data reflect the monthly enrollment data that were submitted to HSES.
   b. If the grantee did not report accurate data to HSES, the grantee will provide the actual enrollment numbers for the previous 4 months.