

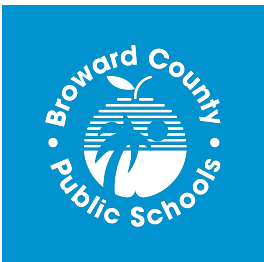
HEAD START/EARLY INTERVENTION DEPARTMENT

HEAD START ANNUAL BOARD

Board Workshop
August 9, 2016

Dr. Nicole M. Mancini, Director

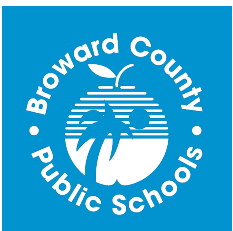
Ruth Ann Drummond, Specialist



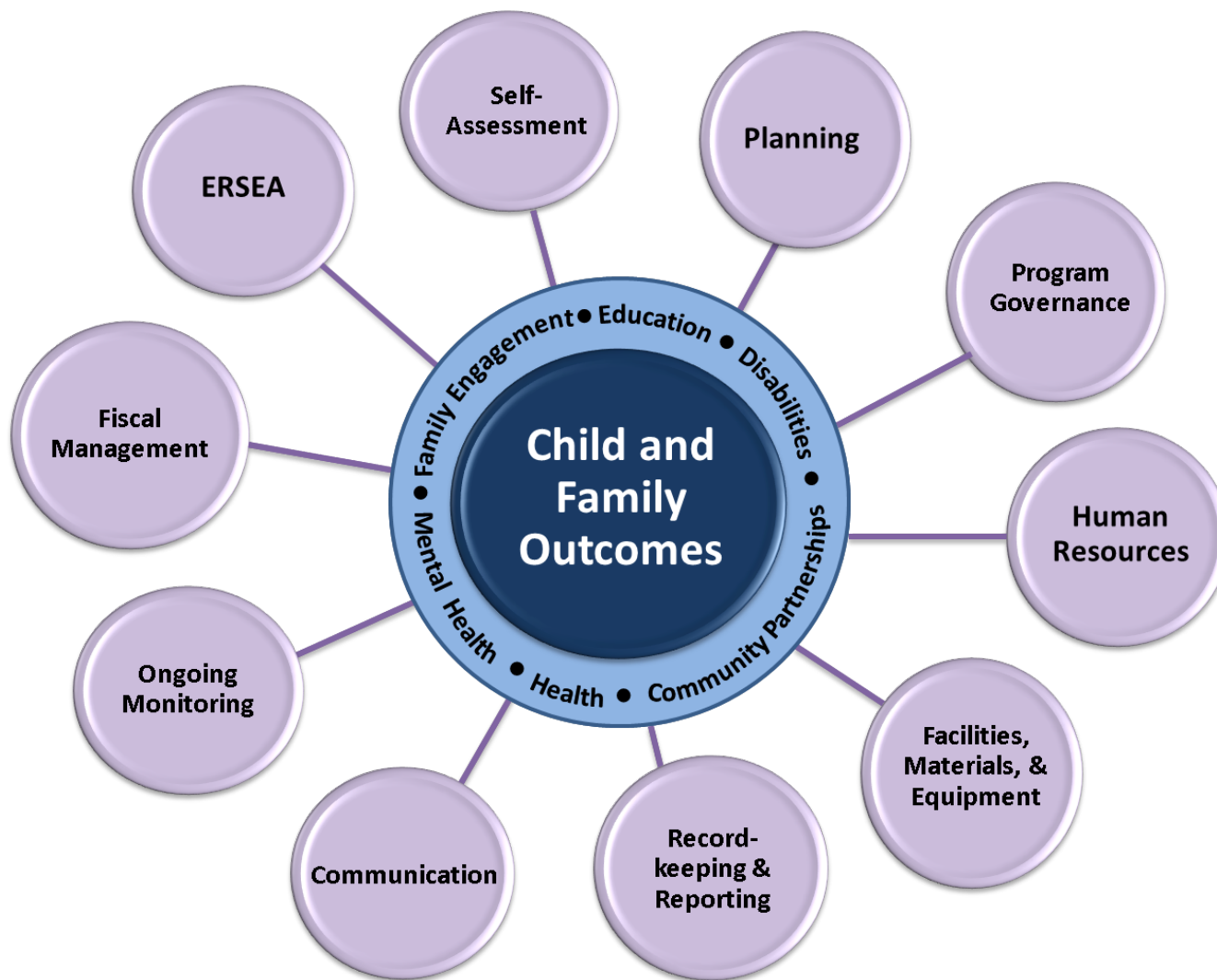
BROWARD COUNTY PUBLIC SCHOOLS

OBJECTIVES

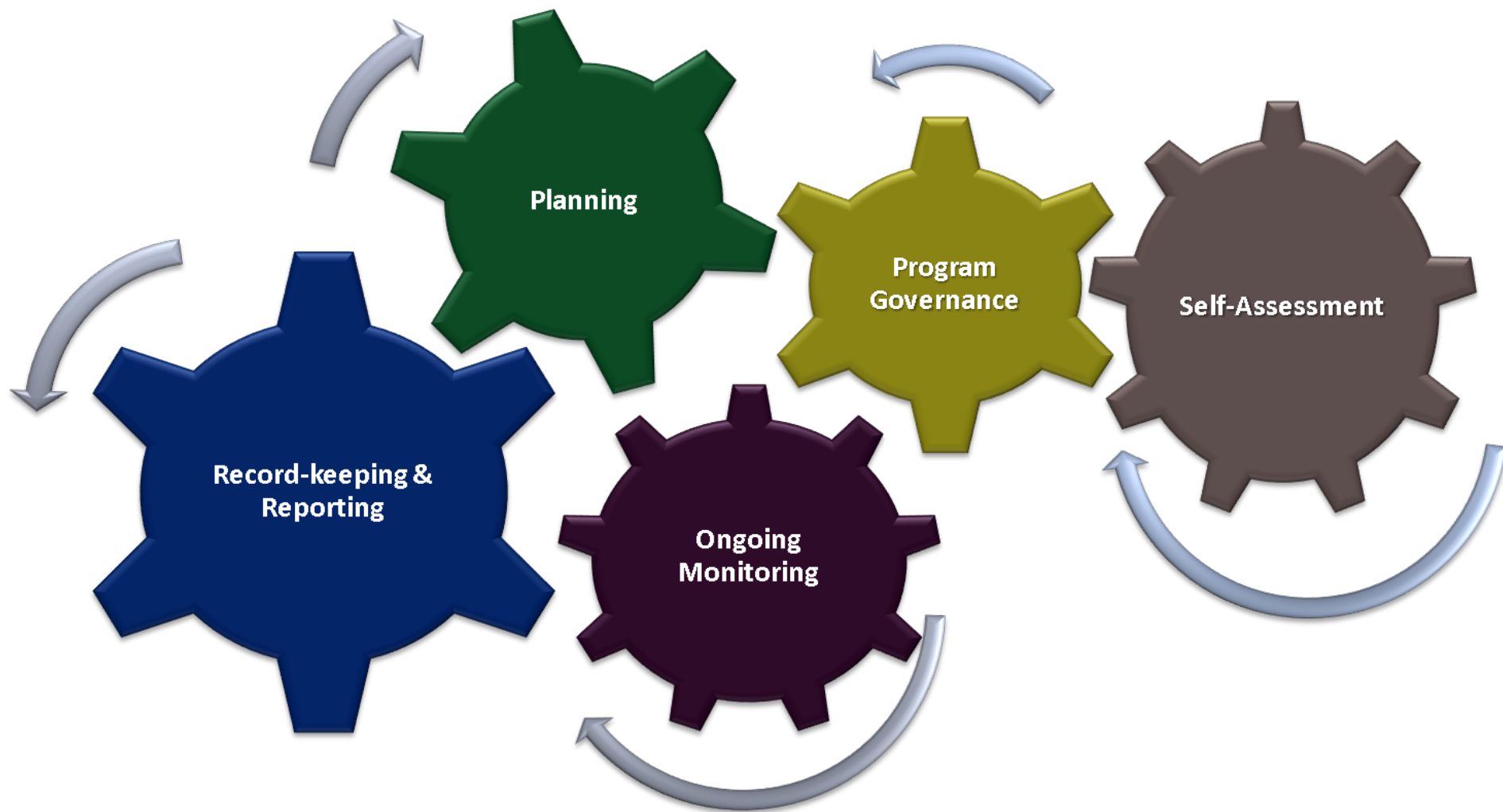
1. Understand Head Start Program Governance Regulations and Requirements
2. Review the composition of the governance structure
3. Understand roles and responsibilities as a governing body member
4. Ensure compliance with federal standards and regulations



MANAGEMENT SYSTEMS

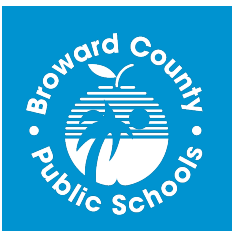


SYSTEMS ARE LINKED



HEAD START GOVERNANCE AND REGULATIONS

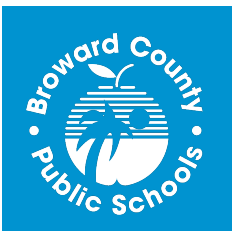
- Head Start Act of 2007
- Head Start Program Performance Standards
- Information Memorandums (IM)
- Program Instructions (PI)
- Policy Clarifications
- Other federal requirements
- State regulations
- Local regulations
- Organizational regulations



HEAD START GOVERNANCE REQUIREMENTS: SEC. 642 (c)(1)(A)

In General

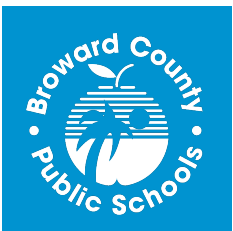
- Legal responsibility for ensuring that grant activities respond to regulations, terms and conditions of the grant
- Fiscal responsibility for ensuring that funds are used prudently and according to regulations
- Overall responsibility to be engaged and knowledgeable about the program's five-year goals, progress towards achieving those goals, and outcomes for children, families and the community



GOVERNING BODY REQUIREMENTS: SEC. 642 (c)(1)(B)

General Composition

- (i) Not less than 1 member **shall** have a background and expertise in fiscal management or accounting.
- (ii) Not less than 1 member **shall** have a background and expertise in early childhood education and development.
- (iii) Not less than 1 member **shall** be a licensed attorney familiar with issues that come before the governing body.
- (iv) Additional members **shall**:
 - (I) reflect the community to be served and include parents of children who are currently, or were formerly, enrolled in Head Start programs; and
 - (II) are selected for their expertise in education, business administration, or community affairs.

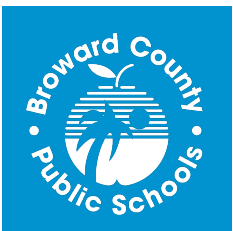


GOVERNING BODY REQUIREMENTS: SEC. 642 (c)(1)(B)

Exceptions

(v) Exceptions **shall** be made to the requirements of clauses (i) through (iv) for members of a governing body when those members oversee a public entity and are selected to their positions with the public entity by public election or political appointment.

(vi) If a person described in clause (i), (ii), or (iii) is not available to serve as a member of the governing body, the governing body shall use a consultant, or another individual with relevant expertise, with the qualifications described in that clause, who **shall** work directly with the governing body.

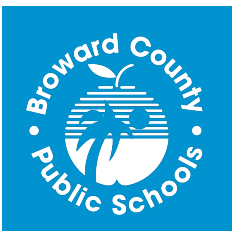


GOVERNING BODY REQUIREMENTS: SEC. 642 (c)(1)(C)

Conflict of Interest

Members of Governing Body shall:

- (i) not have a financial conflict of interest with the Head Start agency (including any delegate agency);
- (ii) not receive compensation for serving on the governing body or for providing services to the Head Start agency;
- (iii) not be employed, nor shall members of their immediate family be employed, by the Head Start agency (including any delegate agency); and
- (iv) operate as an entity independent of staff employed by the Head Start agency.

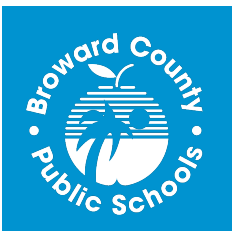


GOVERNING BODY REQUIREMENTS: SEC. 642 (c)(1)(D)

Conflict of Interest - Exception

If an individual holds a position as a result of public election or political appointment, and such position carries with it a concurrent appointment to serve as a member of a Head Start agency governing body, and such individual has any conflict of interest described in clause (ii) or (iii) of subparagraph (C)-

- (i) such individual shall not be prohibited from serving on such body and the Head Start agency shall report such conflict to the Secretary; and
- (ii) if the position held as a result of public election or political appointment provides compensation, such individual shall not be prohibited from receiving such compensation.

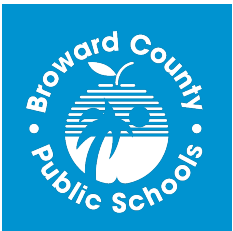


GOVERNING BODY RESPONSIBILITIES: SEC. 642 (c)(1)(E)(i)-(iii)

Responsibilities

The Governing Body shall:

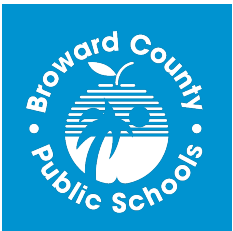
- (i) have legal and fiscal responsibility for administering and overseeing programs under this subchapter, including the safeguarding of federal funds;
- (ii) adopt practices that assure active, independent, and informed governance of the Head Start agency, including practices consistent with subsection (d)(1), and fully participate in the development, planning and evaluation of the Head Start programs involved;
- (iii) be responsible for ensuring compliance with Federal laws (including regulations) and applicable state, tribal and local laws (including regulations); and



GOVERNING BODY RESPONSIBILITIES: SEC. 642 (c)(1)(E)(iv)(I-IV)

Responsibilities, continued

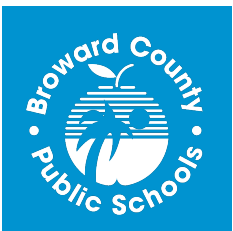
- (iv) be responsible for other activities, including
 - (I) selecting delegate agencies and the service areas for such agencies;
 - (II) establishing procedures and criteria for recruitment, selection, and enrollment of children;
 - (III) reviewing applications for funding and amendments to applications for funding for programs under this subchapter;
 - (IV) establishing procedures and guidelines for accessing and collecting information described in subsection (d)(2);



GOVERNING BODY RESPONSIBILITIES: SEC. 642 (c)(1)(E)(iv)(V-VI)

Responsibilities, continued

- (V) reviewing and approving all major policies of the agency, including—
 - (aa) the annual self assessment and financial audit;
 - (bb) such agency's progress in carrying out the programmatic and fiscal provisions in such agency's grant application, including implementation of corrective actions; and
 - (cc) personnel policies of such agencies regarding the hiring, evaluation, termination, and compensation of agency employees;
- (VI) developing procedures for how members of the policy council are selected, consistent with paragraph(2)(B);



GOVERNING BODY RESPONSIBILITIES: SEC. 642 (c)(1)(E)(iv)(VII)

Responsibilities, continued

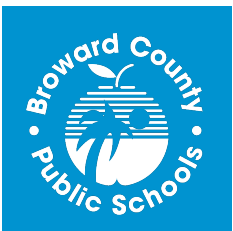
(VII) approving financial management, accounting, and reporting policies, and compliance with laws and regulations related to financial statements, including the

(aa) approval of all major financial expenditures of the agency;

(bb) annual approval of the operating budget;

(cc) selection (except when a financial auditor is assigned by the State under State law or is assigned under local law) of independent financial auditors who shall report all critical accounting policies and practices to the governing body;

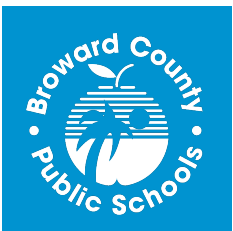
(dd) monitoring of the agency's actions to correct any audit findings and of other actions necessary to comply with applicable laws (including regulations) governing financial statements and accounting practices;



GOVERNING BODY RESPONSIBILITIES: SEC. 642 (c)(1)(E)(iv)(VII-IX)

Responsibilities, continued

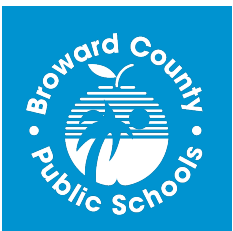
- (VIII) reviewing results from monitoring conducted under section 641A(c) including appropriate follow-up activities;
- (IX) approving personnel policies and procedures, including policies and procedures regarding the hiring, evaluation and compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency;



GOVERNING BODY RESPONSIBILITIES: SEC. 642 (c)(1)(E)(iv)(X-XI)

Responsibilities, continued

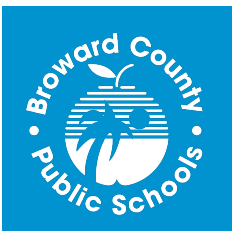
- (X) establishing, adopting, and periodically updating written standards of conduct that establish standards and formal procedures for disclosing, addressing, and resolving
 - (aa) any conflict of interest, and any appearance of conflict of interest, by members of the governing body, officers and employees of the Head Start agency, and consultants and agents who provide services or furnish goods to the Head Start agency; and
 - (bb) complaints, including investigations, when appropriate;
- (XI) to the extent practicable and appropriate at the discretions of the governing body, establishing advisory committees to oversee key responsibilities related to program governance and improvement of the Head Start program involved.



POLICY COUNCIL REQUIREMENTS: SEC. 642 (c)(2)(A)

In General

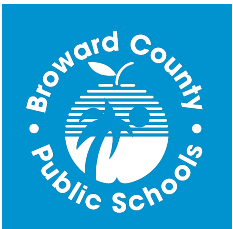
Consistent with paragraph (1)(E), each Head Start agency shall have a policy council responsible for the direction of the Head Start program, including program design and operation, and long-and short-term planning goals and objectives, taking into account the annual communitywide strategic planning and needs assessment and self-assessment.



POLICY COUNCIL REQUIREMENTS: SEC. 642 (c)(2)(B)

Composition and Selection

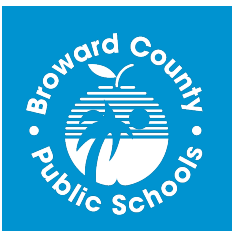
- (i) The policy council shall be elected by the parents of children who are currently enrolled in the Head Start program of the Head Start agency.
- (ii) The policy council shall be composed of—
 - (I) parents of children who are currently enrolled in the Head Start program of the Head Start agency (including any delegate agency), who shall constitute a majority of the members of the policy council; and
 - (II) members at large of the community served by the Head Start agency (including any delegate agency), who may include parents of children who were formerly enrolled in the Head Start program of the agency.



POLICY COUNCIL REQUIREMENTS: SEC. 642 (c)(2)(C)

Conflict of Interest

- (i) not have a conflict of interest with the Head Start agency (including any delegate agency); and
- (ii) not receive compensation for serving on the policy council or for providing services to the Head Start agency.

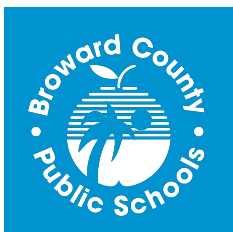


POLICY COUNCIL RESPONSIBILITIES: SEC. 642 (c)(2)(D)(i-iv)

Responsibilities

Policy council **shall** approve and submit to the governing body decisions about each of the following activities:

- (i) Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start agency is responsive to community and parent needs.
- (ii) Program recruitment, selection, and enrollment priorities.
- (iii) Applications for funding and amendments to applications for funding for programs under this subchapter, prior to submission of applications described in this clause.
- (iv) Budget planning for program expenditures, including policies for reimbursement and participation in policy council activities.

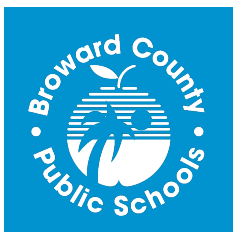


POLICY COUNCIL RESPONSIBILITIES: SEC. 642 (c)(2)(D)(v-viii)

Responsibilities

Policy council **shall** approve and submit to the governing body decisions about each of the following activities:

- (v) Bylaws for the operation of the policy council.
- (vi) Program personnel policies and decisions regarding the employment of program staff, consistent with paragraph (1) (E) (iv) (IX), including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff.
- (vii) Developing procedures for how members of the policy council of the Head Start agency will be elected.
- (viii) Recommendations on the selection of delegate agencies and the service areas for such agencies.

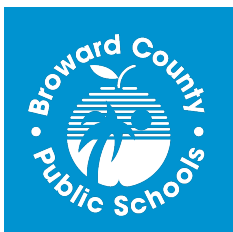


POLICY COUNCIL COMMITTEES: SEC. 642 (c)(3)(A-C)

Committees (Related to DELEGATE AGENCIES ONLY)

- (A) be elected and composed of members, consistent with paragraph (2)(B) (with respect to delegate agencies);
- (B) follow procedures to prohibit conflict of interest, consistent with clauses (i) and (ii) of paragraph (2)(C) (with respect to delegate agencies); and
- (C) be responsible for approval and submission of decisions about activities as they relate to the delegate agency, consistent with paragraph (2)(D) (with respect to delegate agencies).

SBBC does NOT have delegate agencies. We have PARENT COMMITTEES at each location that meet quarterly as part of Parent Activities to share and review program information.



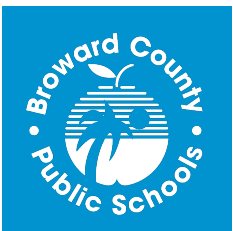
GOVERNING BODY AND POLICY COUNCIL IMPASSE: SEC. 642 (d)(1)

Impasse Policies

Develop policies, procedures, and guidance for Head Start agencies concerning-

(A) the resolution of internal disputes, including any impasse in the governance of Head Start programs; and

(B) the facilitation of meaningful consultation and collaboration about decisions of the governing body and policy council.

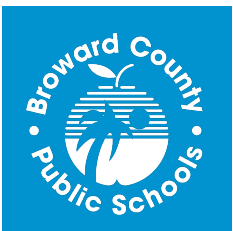


GOVERNING BODY AND POLICY COUNCIL CONDUCT OF RESPONSIBILITIES: SEC. 642 (d)(2)(A-D)

Conduct of Responsibilities

Ensure the sharing of accurate and regular information for use by the governing body and policy council, about program planning, policies, and Head Start agency operations, including-

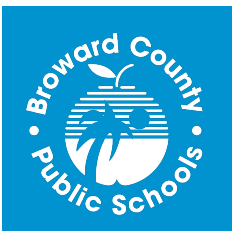
- (A) Monthly financial statements, including credit card expenditures;
- (B) Monthly program information summaries;
- (C) Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency;
- (D) Monthly reports of meals and snacks provided through programs of the Department of Agriculture;



GOVERNING BODY AND POLICY COUNCIL CONDUCT OF RESPONSIBILITIES: SEC. 642 (d)(2)(E-I)

Conduct of Responsibilities, continued

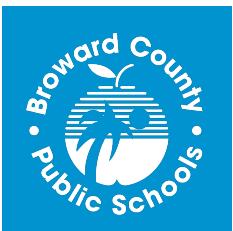
- (E) The financial audit;
- (F) The annual self-assessment, including any findings related to such assessment;
- (G) The communitywide strategic planning and needs assessment of the Head Start agency, including any applicable updates;
- (H) Communication and guidance from the Secretary; and
- (I) The program information reports.



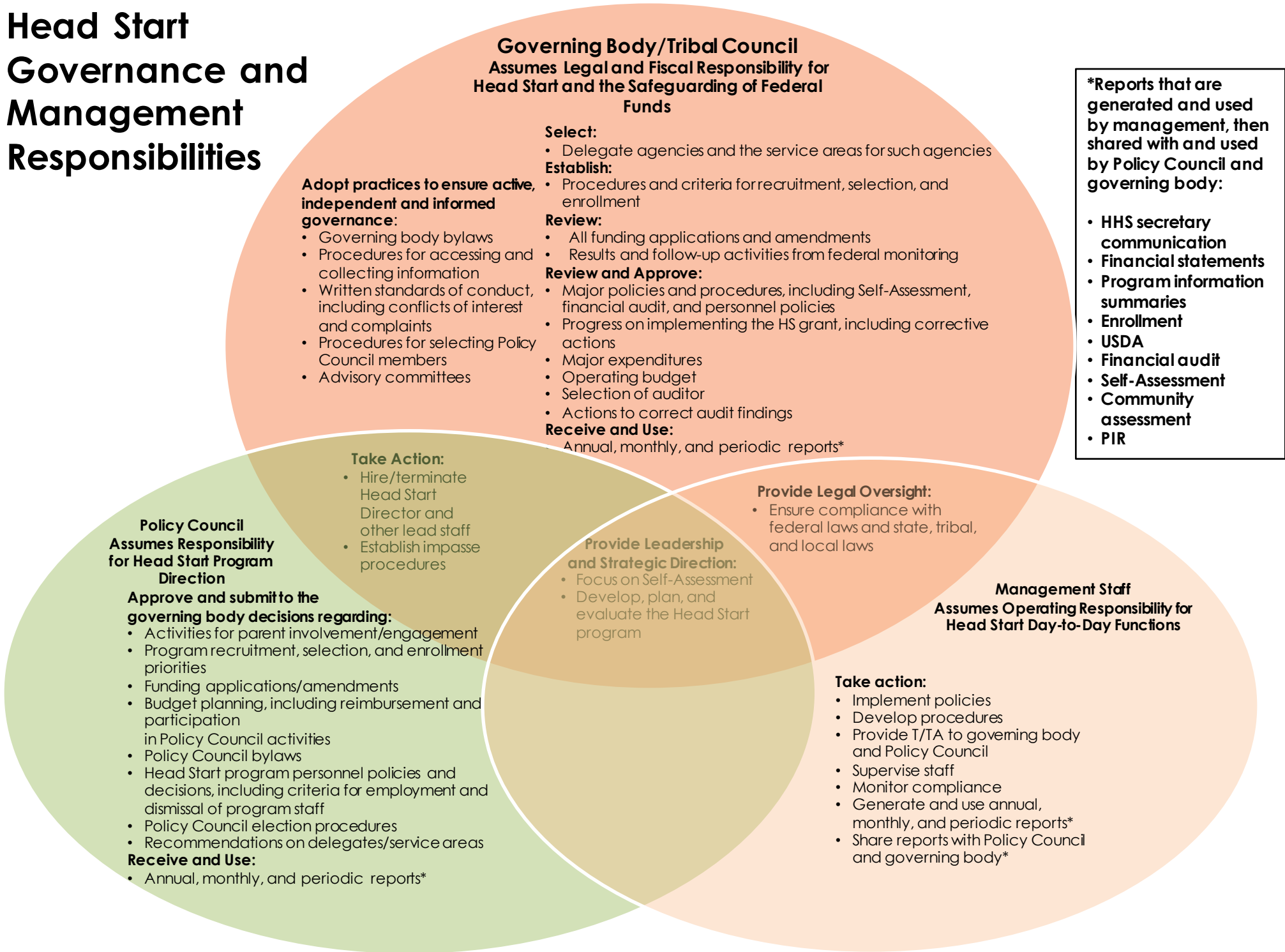
GOVERNING BODY AND POLICY COUNCIL TRAINING AND TECHNICAL ASSISTANCE: SEC. 642 (d)(3)

Training and Technical Assistance

Appropriate training and technical assistance shall be provided to the members of the governing body and the policy council to ensure that the members understand the information the members receive and can effectively oversee and participate in the programs of the Head Start agency.

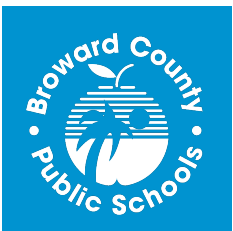


Head Start Governance and Management Responsibilities



HEAD START ELIGIBILITY

- Provides a roadmap for programs on how to determine eligibility
- Describes documents program may accept to prove eligibility
- Requires programs to retain records and to train staff
- Requires programs to have written policies/procedures that include actions taken against staff who intentionally enroll ineligible families



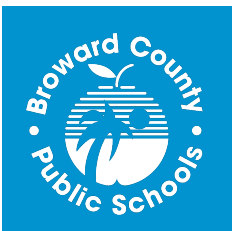
HEAD START ELIGIBILITY

Age Eligibility (Birth Certificate, Hospital Footprints, or Passport)

Early Head Start applicants must be an infant or toddler younger than 3 years old OR a pregnant woman

Head Start children must:

- Be at least 3 years old; OR
- Turn 3 by the date used to determine eligibility in the public school system; AND
- Not be older than compulsory school age.



HEAD START ELIGIBILITY

Income Eligibility

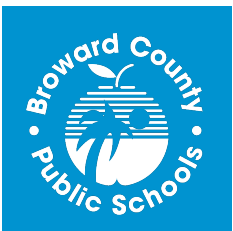
- Family's income is equal to or below the poverty line; OR
- Family is eligible for public assistance (TANF or SSI)

Income documents may include:

- W-2, Tax Return, Child Support Printout, Check Stub, Grant, Scholarship Printout, Letter of Financial Support, Verification of Income, Statement of Applicant, or Unemployment Verification
- TANF Printout or Social Security Disability Documents

Categorical Eligibility (Homeless Verification Form, Foster Care paperwork, other Legal Paperwork)

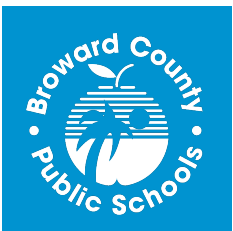
- Homeless OR
- Foster care



HEAD START ELIGIBILITY

Provisions include:

- Option for telephone interview
- Eligibility determination records
- Allowance for serving homeless children
- Written declarations
- Third party verification
- Program policies and procedures (including actions for violating regulations)
- Training for Staff and Governing Bodies

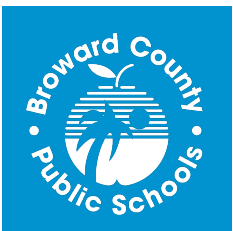


HEAD START ELIGIBILITY

Staff must create an *Eligibility Determination Record* for each participant.

Eligibility Determination Record MUST include:

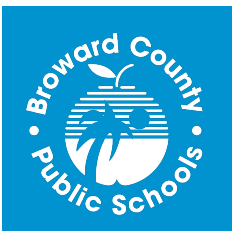
- Copies of documents used to verify eligibility
- Statement that program staff has made reasonable efforts to verify information
- Statement that identifies eligibility determination (e.g., Income or Categorically Eligible)



HEAD START ELIGIBILITY

Each Head Start Program may enroll:

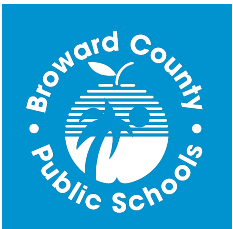
- Up to 10% of their enrollment with over-income families (100-130%); AND
- An additional 35% of their enrollment with over-income families if:
 - The program implements outreach and enrollment procedures to ensure meeting the needs of eligible applicants; **and**
 - Establishes criteria that ensures eligible pregnant women are served first



HEAD START ELIGIBILITY

If a program chooses to enroll an additional 35% of participants that are over-income, it **MUST be able to report:**

- How it is meeting the needs of eligible families;
- Outreach and enrollment policies and procedures;
- Efforts to be fully enrolled;
- Policies and procedures and selection criteria;
- Current and previous enrollment;
- Number of pregnant women and children served; **and,**
- The eligibility criteria category of each child on the waiting list.



PROGRAM GOVERNANCE TRAINING RESOURCES

Early Childhood Learning and Knowledge Center (ECLKC)

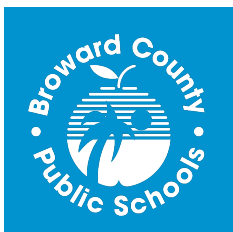
<https://eclkc.ohs.acf.hhs.gov/hslc>

Building Skills of Head Start Leaders

<https://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/govtraining>

Final Rule Webinar

<http://eclkc.ohs.acf.hhs.gov/hslc/tta-system/operations/mang-sys/ersea/eligibility-webinar.html>



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