

Head Start Monthly Report February 2020

Conduct of Responsibilities –

Each Head Start agency shall 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;
- (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;

In accordance with the New Head Start Performance Standards that went into effect on November 7, 2016:

1301.2 (b) Duties & Responsibilities of the Governing Body -

(1) The governing body is responsible for activities specified at section 642©(1)€ of the Head Start Act.

(2) The governing body must use ongoing monitoring results, data on school readiness goals, and other information described in 1302.102, and information described at section 642(d)(2) of the Act to conduct its responsibilities.

Please see Program Information Summary & attachments to this monthly report for monitoring reports.

A. Monthly Financial Statements including credit card expenditures: \$501.46

1/18/20	Cbus Marriott	\$226.72	W. Langston
1/19/20	Cbus Marriott	\$226.72	C. Jarvis
1/26/20	American Airlines	\$30.00	A. Esser
1/26/20	SQ* Amarjit	\$18.02	A. Esser

B. Program Information Summary

Attendance in January was very low. In reviewing absentee reasons, data indicates several illnesses impacted families. Thankfully, weather has not had a significant impact on services.

January was filled with numerous professional development opportunities for staff. Managers provided Child Abuse & Neglect, Communicable Diseases, and FA / CPR on-site. Two days were dedicated to foundational Conscious Discipline training that supports program goals. The Director met with all staff to review the Child Guidance & Discipline policy and to discuss the “see something say something” & “culture of safety” environment.

In the community, the Director continued working on the No Wrong Door Committee and the Education Task Force Committee. The Director met with Alicia Bruce with the ADAMAS Board to discuss the potential for future collaboration on a therapeutic intervention classroom for children experiencing trauma. The Director has been working with the Curriculum Director through Celina City Schools to improve transitions from Head Start to kindergarten.

The administrative team reviewed ECLKC resources on a new approach to self-assessment (please see attachment).

During the week of January 28 – 31, the Director attended the National Head Start Winter Leadership Institute. The National Head Start Association and the Office of Head Start shared updates and forecasted future endeavors. The Director, along with other Ohio grantees met with Congressmen Jordan's, Davidson's, and Latta's staff. Head Start enjoys bipartisan support in Congress. The Director was able to share data regarding local impact including school readiness gains, impact on the local economy, and how our program serves working families.

Over the holiday break, Congress along with President Trump approved the fiscal spending bill for FY 2020. \$550 million additional dollars were appropriated to Head Start for COLA raises, Quality Improvement, and EHS expansion.

Unfortunately, the program sustained the resignation of a Teacher Assistant and Family Advocate mid-way through the year. As an administrative team we are looking for high-quality individuals to fill these positions. We are not the only program experiencing this issue. The Office of Head Start as well as OHSAI acknowledges that there is a shortage of individuals entering the early childhood education field. The Director is working through OHSAI to gain some knowledge from higher institutions of learning regarding the enrollments of early childhood education, social work, and mental health.

The Director conducted the annual Shared Governance training with the Board of Education and Policy Council.

Education – Head Start is recognizing the week of February 18th as Dual Language Learners Celebration week. February 14th marks the end of our second checkpoint period for student assessment.

Mental Health – MCHS continues to meet with families on a regular basis to develop intervention strategies for children displaying negative or harmful behaviors. 43 children have been referred to our mental health consultant in the past 5 months. When reviewing program data, parents indicated that 53 of our children live in homes where mental health is a concern.

Disabilities – We are currently serving 28 children on IEP with 9 more indicated suspected.

Health – As mentioned earlier, flu and other illnesses impacted attendance in January for students and staff. Health Manager is working on educational materials to send to parents to educate on how to prevent the spread of illnesses at home and school.

Family Engagement – MCHS held 2 parent engagement activities. The Watch DOGS (dad’s group) continues to be more successful than the mom’s groups. There are vacancies on Policy council due to attendance issues. The FESM will hold another election for parents who may be interested.

C. Enrollment / Attendance

MCHS reported 157 children enrolled with 1 slot reserved for foster children through DJFS. The new reporting system requires grantees to report vacancies less than 30 days monthly as well. MCHS reported 3 vacancies. This indicated that 161 children were actually served in the month of January.

Enrollment by Program Option:

Half Day PY Head Start	67
Full Day School Year Ed Complex	71
Full Day School Year Rockford	19

Attendance by Program Option:

Half Day PY Head Start	78.08%
Full Day School Year Ed Complex	78.82%
Full Day School Year Rockford	77.78%

D. CACFP report – CACFP claimed meals

Month Served	January 2020
Total Days Attendance	Rockford - 18 Part Day programming - 17 Ed Complex Full day Programming - 19
Total Breakfast	1667
Total Lunches	1868
Total Snacks	1388
Total Meals	5420

E. Financial Audit – Began in January 2020

F. Annual Self-Assessment

- Begins May 2020
- Expect an invitation from the Director to participate in the process

G. Community Assessment

- Due summer 2020

H. Communication and guidance from the Secretary

- Duration threshold lowered
- Inclusion requirement of children with disabilities

Attachments to report:

Self - Assessment plan (requires approval)

1303 Subpart B Service plan & Policies (needs approval)

Family Advocate Home Visit Report

Family Partnership Agreement Report

Parent Teacher Conference Report

Respectfully submitted,

Amy Esser

Executive Director

439 Early Childhood

439-9920	Salaries 100	Fringes 200	Purchased Services 400	Supplies 500	Capital Outlay 600	Other 800	Total
Original CCIP Budget	31,400.00	20,600.00	-	-	-	-	52,000.00
	-	-	-	-	-	-	-
	-	-	-	-	-	-	-
	-	-	-	-	-	-	-
Adjusted CCIP Budget	31,400.00	20,600.00	-	-	-	-	52,000.00
Exp thru 9/30	3,781.79	2,153.86					5,935.65
Exp thru 10/31	3,634.26	2,049.45					5,683.71
Exp thru 11/30	3,697.49	2,140.84					5,838.33
Exp thru 12/31	3,556.96	2,271.36					5,828.32
Exp thru 01/31	3,642.10	3,655.68					7,297.78
Exp thru 02/28							-
Exp thru 03/31							-
Exp thru 04/30							-
Exp thru 05/31							-
Exp thru 06/30							-
Exp thru 07/31							-
Exp thru 08/31							-
Total Expenditures	18,312.60	12,271.19	-	-	-	-	30,583.79

CCIP Budget							
Remaining	13,087.40	8,328.81	-	-	-	-	21,416.21

CAN SPEND UP TO BUDGET PLUS 10%	34,540.00	22,660.00					
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HEAD START - 2019 GRANT

REVENUE

	FEDERAL BUDGET	OTHER SOURCES	TOTAL REVENUES	REVENUE RECEIVED	REMAINING FUNDING
Federal Revenue	1,698,712.00	-	1,698,712.00	1,400,622.49	298,089.51
CACFP Revenue	-	88,230.00	88,230.00	103,578.77	(15,348.77)
Other Local	-	-	-	7,956.35	(7,956.35)
Refund prior year exp	-	-	-	-	-
Board advance	-	-	-	-	-
Total	1,698,712.00	88,230.00	1,786,942.00	1,512,157.61	274,784.39

EXPENSES

	FEDERAL BUDGET	OTHER SOURCES	TOTAL BUDGET	ACTUAL EXPENDED	EXPENDABLE BALANCE	ENCUMBERED/ REQUISITIONS	REMAINING BALANCE	
Salary	678,779.00	50,400.00	729,179.00	676,740.69	52,438.31	-	52,438.31	
Fringe Benefits	478,144.00	9,100.00	487,244.00	382,733.24	104,510.76	-	104,510.76	
Programming	180,306.00	4,230.00	184,536.00	150,787.97	33,748.03	12,306.92	21,441.11	
Supplies	197,284.00	24,500.00	221,784.00	185,685.49	36,098.51	54,168.09	(18,069.58)	
Capital Outlay	99,139.00	-	99,139.00	86,139.00	13,000.00	-	13,000.00	
Other Expenditures	12,125.00	-	12,125.00	2,481.80	9,643.20	345.00	9,298.20	
PA22 subtotal	1,645,777.00	88,230.00	1,734,007.00	1,484,568.19	249,438.81	66,820.01	182,618.80	
Training & Technical Services								
Training & technical serv (job code 400)	419	24,319.00	-	24,319.00	11,814.50	12,504.50	-	12,504.50
Staff out of town travel	439	24,966.00	-	24,966.00	14,532.12	10,433.88	-	10,433.88
Subtotal Purch Service		49,285.00	-	49,285.00	26,346.62	22,938.38	-	22,938.38
Training & Tech Supplies								
Training & Tech Supplies		3,650.00	-	3,650.00	1,242.80	2,407.20	-	2,407.20
Subtotal Supplies		3,650.00	-	3,650.00	1,242.80	2,407.20	-	2,407.20
T&TA -PA20		52,935.00	-	52,935.00	27,589.42	25,345.58	-	25,345.58
Return of Board Advance		-	-	-	-	-	-	-
TOTALS		1,698,712.00	88,230.00	1,786,942.00	1,512,157.61	274,784.39	66,820.01	207,964.38

TOTAL REVENUE OVER/UNDER TOTAL EXPENDITURES (0.00)

HEAD START - 2020 GRANT

REVENUE

	FEDERAL BUDGET	OTHER SOURCES	TOTAL REVENUES	REVENUE RECEIVED	REMAINING FUNDING
Federal Revenue	917,083.00	-	917,083.00	261,000.00	656,083.00
CACFP Revenue	-	41,583.00	41,583.00	7,807.46	33,775.54
Other Local	-	-	-	-	-
Refund prior year exp	-	-	-	-	-
Board advance	-	-	-	-	-
Total	917,083.00	41,583.00	958,666.00	268,807.46	689,858.54

EXPENSES

	FEDERAL BUDGET	OTHER SOURCES	TOTAL BUDGET	ACTUAL EXPENDED	EXPENDABLE BALANCE	ENCUMBERED/ REQUISITIONS	REMAINING BALANCE
Salary	420,198.00	22,902.00	443,100.00	135,971.18	307,128.82	-	307,128.82
Fringe Benefits	340,671.00	-	340,671.00	103,278.69	237,392.31	-	237,392.31
Programming	78,987.00	965.00	79,952.00	19,136.94	60,815.06	55,363.24	5,451.82
Supplies	51,856.00	28,650.00	80,506.00	6,578.15	73,927.85	32,490.37	41,437.48
Capital Outlay	-	-	-	-	-	-	-
Other Expenditures	4,739.00	-	4,739.00	1,000.00	3,739.00	75.00	3,664.00
PA22 subtotal	896,451.00	52,517.00	948,968.00	265,964.96	683,003.04	87,928.61	595,074.43
Training & Technical Services							
Training & technical serv (job code 400)	9,617.00	-	9,617.00	1,426.00	8,191.00	-	8,191.00
Staff out of town travel	11,015.00	-	11,015.00	636.34	10,378.66	2,226.33	8,152.33
Subtotal Purch Service	20,632.00	-	20,632.00	2,062.34	18,569.66	2,226.33	16,343.33
Training & Tech Supplies	-	-	-	-	-	-	-
Subtotal Supplies	-	-	-	-	-	-	-
T&TA -PA20	20,632.00	-	20,632.00	2,062.34	18,569.66	2,226.33	16,343.33
Return of Board Advance	-	-	-	-	-	-	-
TOTALS	917,083.00	52,517.00	969,600.00	268,027.30	701,572.70	90,154.94	611,417.76

TOTAL REVENUE OVER/UNDER TOTAL EXPENDITURES 780.16

ACCT. NUMBER: 5563 7579 0004 4218

CELINA CITY SCHOOLS

COMMERCIAL ACCOUNT ACTIVITY

CELINA CITY SCHOOLS
5563-7579-0004-4218

TOTAL COMMERCIAL ACTIVITY
\$21,505.14CR

ACCOUNTING CODE:

Post Date	Tran Date	Reference Number	Transaction Description	Amount
01-14	01-14		AUTO PAYMENT DEDUCTION	21,505.14 CR

INDIVIDUAL CARDHOLDER ACTIVITY

AMY ESSER
5563-7500-2990-4743

CREDITS
\$0.00

PURCHASES
\$501.46

CASH ADV
\$0.00

TOTAL ACTIVITY
\$501.46

ACCOUNTING CODE:

Travel Activity

Post Date	Tran Date	Reference Number	Transaction Description	Amount
01-20	01-18	55432860018200967655411	COLUMBUS MARRIOTT NW DUBLIN OH 041796 ARRIVAL: 01-15-20	226.72
01-20	01-19	55432860019200170591295	COLUMBUS MARRIOTT NW DUBLIN OH 041795 ARRIVAL: 01-15-20	226.72
01-27	01-26	55417340027870270425636	AMERICAN 0010282134679 DAYTON OH ESSER/AMY DEPART: 01-26-20 P.O.S.: SALES TAX: \$0.00 EBC AA Y FEE	30.00
01-27	01-26	55432860026200860952956	SQ *AMARJIT SINGH BURKE VA P.O.S.: 00011529215090108 SALES TAX: 0.00	18.02
Total Travel Activity				\$501.46

Celina City Schools Mercer County Head Start

Self-Assessment Plan 2019-20

<u>February 2020</u>	Self – Assessment plan approved by Policy Council and Board
<u>March 2020</u>	Self-Assessment Invitations distributed
<u>April 2020</u>	Self-Assessment training for staff and community members
<u>May 27-28, 2020</u>	Self- Assessment completed
<u>May 29, 2020</u>	Self-Assessment report completed
<u>June 2020</u>	Self-Assessment reports due to Policy Council & Board
<u>August 2020</u>	Self – Assessment report presented to staff

Recommended Practices for Self-Assessment

What?

A process for reviewing progress on goals and objectives, being accountable for what you proposed in your application, and determining if resources are used effectively

Why?

To leverage strengths and look for areas of improvement and innovation

Who?

Program staff, parents, Policy Council and governing body/Tribal Council members, community leaders, content experts, and other interested people

When?

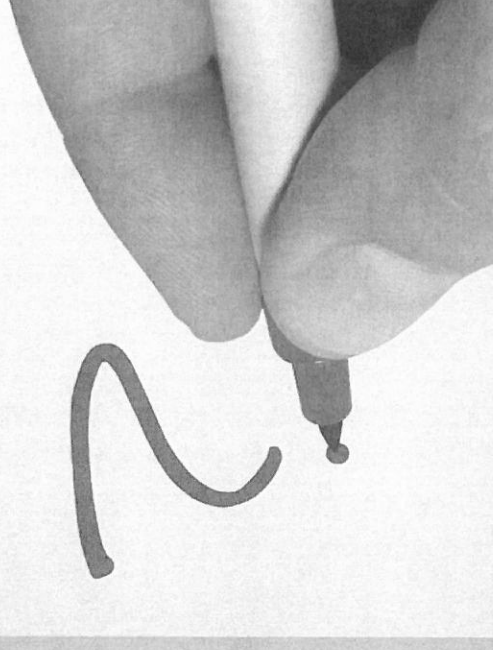
Annually

How?

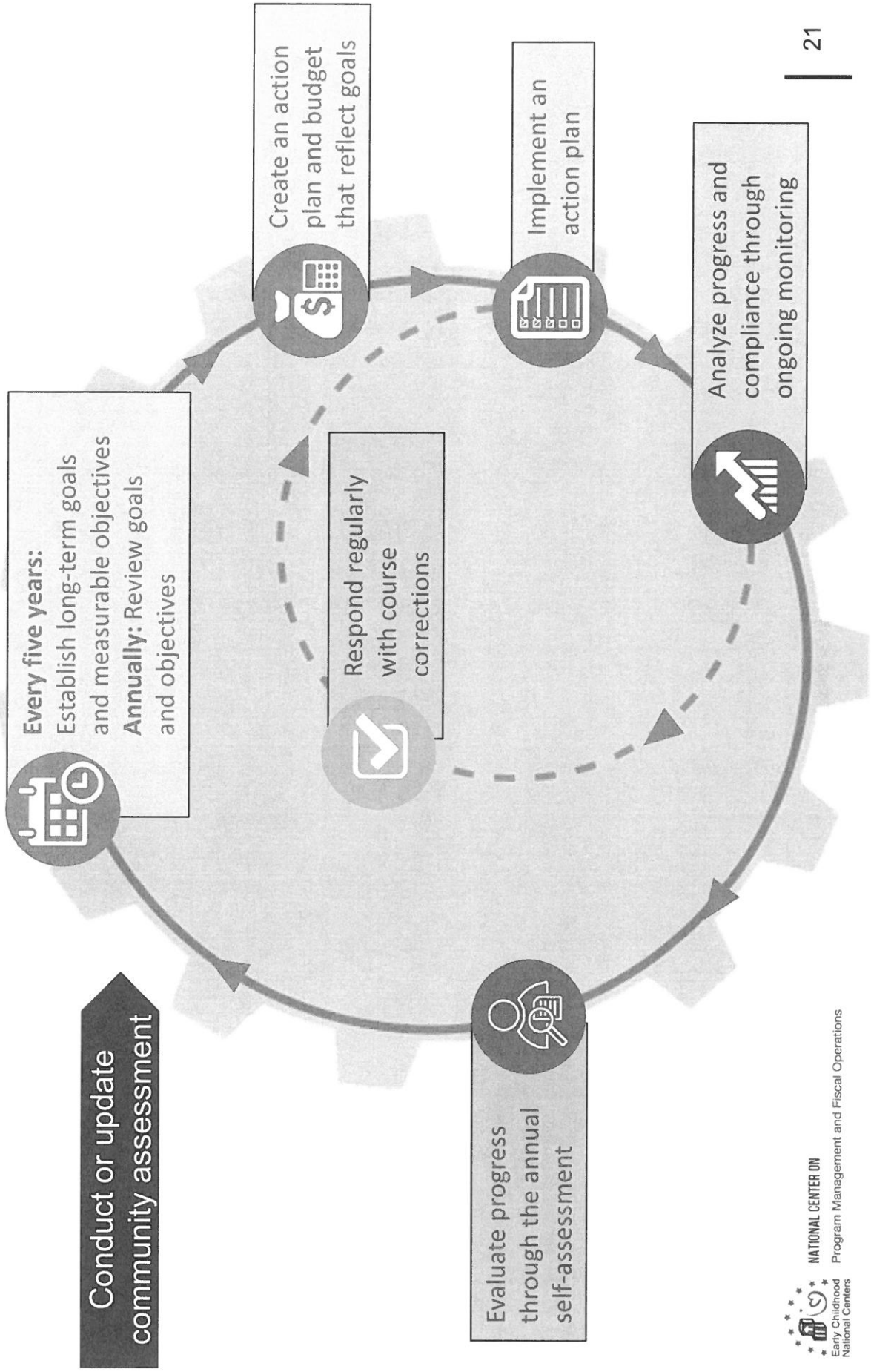
Follow the five-phase self-assessment process

How Is the Self-Assessment Used?

- Director creates final report from the recommendations
- Policy Council and governing body/Tribal Council approve the final report
- Director submits report to Regional Office
- Self-assessment report and recommendations are used in future planning and goal-setting



Program Planning for Continuous Improvement



1003-Family Partnership Goals by Advocate

Agency: ALL		Site: ALL							Size: 164	
1003-Family Partnership Goals by Advocate										
Advocate	# Of Fam. Assigned	# Of Fam. W/At Least One Goal	% Fam. With Goals	# Of Goals Submitted	# Of Goals Completed	# Of Goals In Progress	% Of Goals Completed	# Of Families w/ No Goals	% Of Families w/ No Goals	
Berke, Jenine	51	15	83.33%	18	14	34	29.17%	2	16.7%	
Jarvis, Claire	53	50	94.34%	50	2	48	4.00%	3	5.7%	
Loudensiegel, Amy	55	17	85.45%	18	14	34	29.17%	8	14.5%	
Total	162	142	87.7%	146	30	116	20.5%	20	12.3%	
No Advocate	2	0	0.00%	0	0	0	0	2	100.0%	
Grand Total	164			146	30	116				

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1007S - Family Visits Statistics

Agency: All

Receiving Services: 142

1007S - Family Visits Statistics

Visit Type	Cancelled by Family	Cancelled by Staff	Completed/Received	No Show	Planned Visit	Total	Required Visits
Center Visit	0	0	0	0	0	0	4
CPEFSW Home Visit	18	4	130	15	15	192	188
Disabilities	0	0	2	0	0	2	2
Family Contact Visit	0	0	5	5	7	16	15
Health	0	0	0	1	0	1	0
Mental Health	0	0	0	0	0	0	0
Nutrition	0	0	0	0	0	0	0
Parent Conference	0	0	0	0	0	0	0
Pregnancy Health Visit	0	0	0	0	0	0	0
Pregnancy Nutrition Visit	0	0	0	0	0	0	0
Teacher Home Visit	0	0	0	0	0	0	0
Total	18	4	154	21	22	219	209
Total UNIQUE Number of Visits	18	4	149	20	22	213	203

* Note: Since multiple visit types can be indicated for each visit, Total Visits is not necessarily the total number of visits.

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The U.S. Department of Health and Human Services' Secretary Azar Lowers Head Start Service Duration Requirement to 45%

eclkc.ohs.acf.hhs.gov/policy/pi/acf-pi-hs-20-01
January 28, 2020

The U.S. Department of Health and Human Services' Secretary Azar Lowers Head Start Service Duration Requirement to 45% ACF-PI-HS-20-01

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

1. Log Number: ACF-PI-HS-20-01
2. Issuance Date: 01/30/2020
3. Originating Office: Office of Head Start
4. Key Words: Head Start Service Duration; Duration Requirements

Program Instruction

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

Subject: The U.S. Department of Health and Human Services' Secretary Azar Lowers Head Start Service Duration Requirement to 45%

Instruction:

This Program Instruction (PI) notifies programs that the U.S. Department of Health and Human Services' (HHS) Secretary has exercised his authority under Head Start Program Performance Standard [45 CFR §1302.21\(c\)\(3\)\(ii\)](#) to lower the requirement that a program provide 1,020 hours of planned class operations by August 1, 2021, from 100% of center-based funded enrollment to 45%.

Head Start Center-based Service Duration Requirement

The final rule at 45 CFR §1302.21(c)(2)(iv) states a program must provide 1,020 annual hours of

planned class operations over at least eight months per year for 100% of its center-based funded enrollment by August 1, 2021.

The final rule also includes a provision that allows the Secretary to lower the percentage of Head Start center-based slots that must operate at 1,020 annual hours (45 CFR §1302.21(c)(3)(ii)). This decision must be based on an assessment of the availability of sufficient funding to mitigate a substantial reduction in Head Start-funded enrollment.

The Secretary has determined that current Head Start appropriations are not sufficient to support the requirement for 100% of each Head Start program's center-based slots to operate for 1,020 annual hours. It was concluded that if the 100% requirement goes into effect without additional funding, it will result in a substantial reduction in Head Start center-based slots. Therefore, to mitigate a substantial reduction in children served, the requirement is lowered to 45%. Lowering the 1,020 annual hour requirement from 100% to 45% of center-based funded enrollment slots reflects prior Congressional appropriations. The most recent appropriations allowed Head Start programs operating less than 45% of center-based slots at 1,020 hours to apply for funding to increase service duration so that up to 45% of their center-based slots operate for 1,020 hours.

Programs may elect to provide 1,020 annual hours of planned class operations for more than 45% of their center-based funded enrollment. We believe lowering the requirement to 45% affords programs more flexibility to meet the needs of their communities.

Waiver of 45% Service Duration Requirement

Programs may request a waiver of the 45% service duration requirement. In order to receive a waiver, a program must demonstrate that their proposed program design effectively supports children's development and progress in early learning outcomes and better meets the needs of their community ([45 CFR §1302.24](#)). If the waiver of the 45% service duration requirement is approved, or in the case of a double session variation, a program must meet the requirements described in 45 CFR §1302.21(c)(2)(i) or (ii).

The [Federal Register notice](#) announcing this determination with additional details is available for review. If you have questions regarding this PI, please contact your Regional Office.

Thank you for the work you do on behalf of children and families.

/ Dr. Deborah Bergeron /

Dr. Deborah Bergeron
Director
Office of Head Start
Office of Early Childhood Development

See PDF Version of Program Instruction:
[The U.S. Department of Health and Human Services' Secretary Azar Lowers Head Start Service Duration Requirement to 45%](#)[PDF, 104KB]

Inclusion of Children with Disabilities

eclkc.ohs.acf.hhs.gov/policy/im/acf-im-hs-20-01
January 21, 2020

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

1. Log Number: ACF-IM-HS-20-01
2. Issuance Date: 01/22/2020
3. Originating Office: Office of Head Start
4. Key Words: Head Start and Early Head Start; Children with Disabilities; Inclusion

Information Memorandum

To: All Head Start and Early Head Start Agencies and Delegate Agencies

Subject: Inclusion of Children with Disabilities

Abstract:

This Information Memorandum (IM) highlights requirements in the Head Start Program Performance Standards (HSPPS) related to the inclusion of children with disabilities and delays. It includes a list of free resources for grantees' use in implementation efforts.

Background:

Head Start and Early Head Start programs are required to ensure that at least 10% of enrollment slots are occupied by children with disabilities. In fact, Head Start's founders and early pioneers recognized that both children with and without disabilities would benefit from participating together in the same classrooms. Since 1972, over 3 million children with disabilities have fully participated in Head Start.

The 2016 HSPPS provide additional specificity regarding the inclusion of children with disabilities within Head Start and Early Head Start programs. Additionally, at [45 CFR §§1302.62](#) and [1302.60](#), the HSPPS explicitly require that every effort be made to include and provide services to children identified with delays or suspected delays, even if they are not eligible for services under Individuals with Disabilities Education Act (IDEA).

Section [640\(d\)\(1\)](#) of the Head Start Act defines the term "child with a disability" as:

- A child with a disability, as defined in section 602(3) of IDEA
- An infant or toddler with a disability, as defined in section 632(5) of such Act

Information:

Grantees often have questions regarding the requirement that 10% of slots be occupied by children with disabilities. The following information reminds grantees of specific HSPPS requirements for services to children with disabilities.

Enrollment of Children with Disabilities

Each Head Start grant must include a minimum of 10% of all slots occupied by children with disabilities. This requirement helps ensure programs recruit children who are already identified as eligible for IDEA services prior to entering Head Start or Early Head Start, and accurately screen and refer for evaluation any children who may benefit from early intervention, special education, or related services. If a child is found eligible for services under IDEA, they are counted as a Head Start child with a disability even if they have not begun receiving the special education or related services for which they were determined eligible.

When a Head Start agency operates two different Head Start or Early Head grants in adjoining counties, or enrolls children from birth to 5, it should be vigilant in analyzing data. The grantee must ensure, across its programs and grants, that all children with potential disabilities are being identified and evaluated so that early intervention, special education, or related services are being provided as necessary.

For example, a birth to 5 program could report that 12% of enrolled children are children with disabilities, with none of the enrolled infants and toddlers receiving IDEA services. Such a program would need to consider the recruiting, screening, and referral process for infants and toddlers to identify the cause of this difference and ensure that at least 10% of its enrolled infants and toddlers are eligible for services under IDEA.

Many programs will find that significantly more than 10% of enrolled children are eligible for services under IDEA. If, however, after exhaustive efforts, programs cannot meet the requirement, they may request a waiver from their Regional Office.

Timing

Nearly half of the children with disabilities in Head Start and Early Head Start are diagnosed after they enroll in the program. This usually occurs through Head Start and Early Head Start screening or the ongoing assessment and referral process. It takes time to refer children to the agency responsible for conducting evaluations under IDEA, schedule Individualized Family Service Plan (IFSP) and Individualized Education Plan (IEP) meetings, and identify providers. Therefore, the Office of Head Start expects that programs may be midway through the program year (January, for many programs) before reaching the 10% requirement.

If programs are monitored prior to the mid-point, data from the previous year is reviewed. If it is past the middle of the program year and determinations are still pending for children who were referred for evaluation, monitoring teams will look at the number of evaluations pending and when the referrals were made in determining compliance.

Engaging Parents

Head Start programs must work with parents to ensure they understand their right to obtain an evaluation, the benefit of receiving services as early as possible, and their ability to participate in decisions about their children including where services should be delivered. Engaging parents early on and empowering them to advocate for their child's services is imperative to obtaining services during Head Start or Early Head Start enrollment and as the child transitions to kindergarten and beyond.

Children may need to receive IDEA services at another site. When this occurs, careful planning of the child's transition to and from each program is established. The time away from Head Start or Early Head

Start is minimized to ensure receipt of comprehensive services.

Distribution of Children with Disabilities Throughout the Program

There is no regulation stipulating the number of children with disabilities who should be in each classroom. The following elements can all influence how many children with disabilities are in a particular room:

- Children's needs
- Staff capacity
- Availability of early intervention, special education, and related service providers
- Number of children identified as having disabilities after enrollment

Programs must ensure staffing is sufficient to ensure safe, nurturing environments and individualized teaching and learning for all children.

Settings need to be inclusive. If the classroom is predominantly comprised of children with disabilities, it may be a de facto special education classroom rather than a classroom inclusive of children with and without disabilities.

Children with Delays Not Eligible Under IDEA

Children with a suspected delay who are referred for evaluation may not always qualify for services under IDEA even though they have a developmental delay in one or more areas. These children are not counted as part of the program's 10% as they do not meet the statutory requirement as children eligible for services under IDEA. However, Head Start and Early Head Start programs must ensure the individualized needs of all children are being met and all children have access to and are able to fully participate in the full range of activities and services. In some situations, program funds may be used to provide additional support, materials, or accommodations. Individualized services and support may also be available through the child's health insurance.

504 Plans

Section 504 of the Rehabilitation Act requires a "504 Plan" be established by the local education agency responsible for implementing IDEA for an eligible child. A 504 Plan defines, in writing, the protection from discrimination and necessary accommodations or services for children who have special needs but who do not qualify under IDEA. A child who scores within typical ranges but needs physical accommodations, such as a weighted spoon or a standing table to fully access the program, could be an example. Other frequent accommodations under a 504 Plan are the ability to stand while working, sit near the teacher, or take more breaks. It is different than an IEP or an IFSP, which always includes specific special education and related services, such as speech or occupational therapy or itinerant special education services in addition to accommodations.

Head Start programs must protect all children from discrimination and make accommodations as necessary to fully include them in the program. 504 Plans are not required to implement these requirements. If a child enters Head Start with an established 504 Plan, or one is obtained during the child's enrollment, the program must ensure the plan is fully implemented.

While Head Start programs are expected to provide such supports to all children in need, it can be helpful for eligible children to have 504 Plans established as they transition to kindergarten to ensure continued success.

For All Children

Programs are required to screen children, conduct ongoing assessment, partner with families to support them as advocates for their own children, consult with specialists as necessary, help children and

families obtain additional services as appropriate, and take all possible steps to ensure each child's full participation in the program.

Resources for Including Children with Disabilities or Delays

If you have any questions regarding inclusion, please contact your Regional Office. Thank you for all you do to serve the most vulnerable children and families.

/ Dr. Deborah Bergeron /

Dr. Deborah Bergeron
Director
Office of Head Start
Office of Early Childhood Development

See PDF Version of Information Memorandum:
[Inclusion of Children with Disabilities](#)[PDF, 165KB]

<p>1303 Subpart B Administrative Requirements</p>						
<p>1303.10 Purpose</p>	<p>A grantee must observe standards of organization, management, and administration that will ensure, so far as reasonably possible, that all program activities are conducted in a manner consistent with the purposes of the Act and the objective of providing assistance effectively, efficiently, and free of any taint of partisan political bias or personal or family favoritism.</p>		<p>All staff, stakeholders, contractors adhere to the program's Code of Conduct.</p>	<p>Code of Conduct</p>	<p>All stakeholders</p>	<p>Code of Conduct</p>
<p>1303.12 Limitations and prohibitions</p>	<p>An agency must adhere to sections 644(e), 644(g)(3), 653, 654, 655, 656, and 657A of the Act. These sections pertain to union organizing, the Davis-Bacon Act, limitations on compensation, nondiscrimination, unlawful activities, political activities, and obtaining parental consent.</p>	<p>644(e) - (e) Funds appropriated to carry out this subchapter shall not be used to assist, promote, or deter union organizing.</p>	<p>No funds appropriated by the federal government shall be used to assist, promote, or deter union organizing.</p>	<p>Limitations and Prohibitions</p>	<p>CCS Board of Education</p>	<p>Limitations and Prohibitions</p>
		<p>644(g) - (g)(1) Upon a determination by the Secretary that suitable facilities (including public school facilities) are not otherwise available to Indian tribes, rural communities, and other low-income communities to carry out Head Start programs, that the lack of suitable facilities will inhibit the operation of such programs, and that construction of such facilities is more cost effective than purchase of available facilities or renovation,</p>	<p>CCS Board of Education / MCHS will adhere to federal requirements as prescribed regarding the building and or renovating of buildings following guidance prescribed by the Davis Bacon Act.</p>	<p>Davis Bacon Act</p>	<p>CCS Board of Education</p>	<p>Fiscal Policy manual</p>

the Secretary, in the discretion of the Secretary, may authorize the use of financial assistance under this subchapter to make payments for capital expenditures related to facilities that will be used to carry out such programs. The Secretary shall establish uniform procedures for Head Start agencies to request approval for such payments, and shall promote, to the extent practicable, the collocation of Head Start programs with other programs serving low-income children and families.

(2) Such payments may be used for capital expenditures (including paying the cost of amortizing the principal, and paying interest on, loans) such as expenditures for--

(A) construction of facilities that are not in existence on the date of the determination;

(B) major renovation of facilities in existence on such date; and

(C) purchase of vehicles used for programs conducted at the Head Start facilities.

(3) All laborers and mechanics employed by contractors or subcontractors in the construction or renovation of facilities to be used to carry out Head Start programs shall be paid wages at not less than those prevailing on similar construction in the locality, as determined by the Secretary of Labor in accordance with the Act of March 3, 1931, as

		<p>amount equal to the rate payable for level II of the Executive Schedule under section 5313 of title 5, United States Code.</p> <p>(2) COMPENSATION- In this subsection, the term "compensation"--</p> <p>(A) includes salary, bonuses, periodic payments, severance pay, the value of any vacation time, the value of a compensatory or paid leave benefit not excluded by subparagraph (B), and the fair market value of any employee perquisite or benefit not excluded by subparagraph (B); and</p> <p>(B) excludes any Head Start agency expenditure for a health, medical, life insurance, disability, retirement, or any other employee welfare or pension benefit.</p>				
		<p>654 - a) The Secretary shall not provide financial assistance for any program, project, or activity under this subchapter unless the grant or contract with respect thereto specifically provides that no person with responsibilities in the operation thereof will discriminate with respect to any such program, project, or activity because of race, creed, color, national origin, sex, political affiliation, or beliefs.</p> <p>(b) No person in the United States shall on the ground of sex be excluded from participation in, be denied the benefits of, be subjected to discrimination</p>	<p>CCS Board is an EEOE. As part of the MCHS code of conduct, all employees, contractors, and stakeholders are informed of the non-discriminatory practices for service-delivery and or employment.</p>	<p>Code of Conduct</p>	<p>All stakeholders</p>	<p>CCS Bylaws, personnel Policies & procedures</p>

		<p>under, or be denied employment in connection with any program or activity receiving assistance under this subchapter. The Secretary shall enforce the provisions of the preceding sentence in accordance with section 602 of the Civil Rights Act of 1964. Section 603 of such Act shall apply with respect to any action taken by the Secretary to enforce such sentence. This section shall not be construed as affecting any other legal remedy that a person may have if such person is excluded from participation in, denied the benefit of, subjected to discrimination under, or denied employment in connection with, any program, project, or activity receiving assistance under this subchapter.</p> <p>(c) The Secretary shall not provide financial assistance for any program, project, or activity under this subchapter unless the grant or contract relating to the financial assistance specifically provides that no person with responsibilities in the operation of the program, project, or activity will discriminate against any individual because of a handicapping condition in violation of section 504 of the Rehabilitation Act of 1973.</p>	<p>CCS Board personnel policy provides guidance regarding the behavior which is unacceptable for hiring or maintaining employment.</p>	<p>CCS Board personnel policy</p>	<p>CCS Board</p>	<p>CCS Board personnel policy</p>
		<p>655 - Sec. 655. [42 U.S.C. 9850] No individual employed or assigned by or in any Head Start agency or other agency assisted under this subchapter shall, pursuant to or during the performance of services rendered</p>				

		<p>in connection with any program or activity conducted or assisted under this subchapter by such Head Start agency or such other agency, plan, initiate, participate in, or otherwise aid or assist in the conduct of any unlawful demonstration, rioting, or civil disturbance.</p>				
		<p>656 - (a) State or Local Agency- For purposes of Chapter 15 of title 5, United States Code, any agency which assumes responsibility for planning, developing, and coordinating Head Start programs and receives assistance under this subchapter shall be deemed to be a State or local agency. For purposes of clauses (1) and (2) of section 1502(a) of such title, any agency receiving assistance under this subchapter shall be deemed to be a State or local agency.</p> <p>(b) Restrictions-</p> <p>(1) IN GENERAL- A program assisted under this subchapter, and any individual employed by, or assigned to or in, a program assisted under this subchapter (during the hours in which such individual is working on behalf of such program), shall not engage in--</p> <p>(A) any partisan or nonpartisan political activity or any other political activity associated with a candidate, or contending faction or group, in an election for public or party office; or</p>	<p>MCHS does not permit employees to participate in political activities during the employee's contracted work hours.</p> <p>MCHS does not permit employees to participate in the transportation of individuals to and or from voter polling locations.</p>	<p>Restrictions of political activities</p>	<p>All employees</p>	<p>Restrictions of political activities</p>

		<p>(B) any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election.</p> <p>(2) REGISTRATION- No funds appropriated under this subchapter may be used to conduct voter registration activities. Nothing in this subchapter prohibits the availability of Head Start facilities during hours of operation for the use of any nonpartisan organization to increase the number of eligible citizens who register to vote in elections for Federal office.</p> <p>(3) RULES AND REGULATIONS- The Secretary, after consultation with the Director of the Office of Personnel Management, may issue rules and regulations to provide for the enforcement of this section, which may include provisions for summary suspension of assistance or other action necessary to permit enforcement on an emergency basis.</p>		<p>Head Start funds cannot be used for the purpose of voter registration. However, other non-partisan voter registration entities may conduct such activities in a Head Start facility.</p>	<p>Voter Registration limitations</p>	<p>Voter Registration limitations</p>
		<p>657A - a) Definition- The term 'nonemergency intrusive physical examination' means, with respect to a child, a physical examination that--</p> <p>(1) is not immediately necessary to protect the health or safety of the child involved or the health or safety of another individual; and</p>	<p>Mercer County Head Start at NO time will ever conduct any procedure that is deemed intrusive under this definition with the exception of life saving techniques.</p>	<p>Intrusive and non-intrusive procedures</p>	<p>All Staff</p>	<p>Intrusive and non-intrusive procedures</p>

		<p>(2) requires incision or is otherwise invasive, or involves exposure of private body parts.</p> <p>(b) Requirement- A Head Start agency shall obtain written parental consent before administration of any non-emergency intrusive physical examination of a child in connection with participation in a program under this subchapter.</p> <p>(c) Rule of Construction- Nothing in this section shall be construed to prohibit agencies from using established methods, for handling cases of suspected or known child abuse and neglect, that are in compliance with applicable Federal, State, or tribal law.</p>	<p>Head Start staff will obtain written permission to conduct any non-intrusive procedure (i.e. vision screening) prior to performing the procedure.</p> <p>MCHS staff are trained in identifying and reporting suspected Child abuse and neglect and as such will follow established policy and procedure.</p>	<p>Parent permission for program services</p> <p>Child Abuse and Neglect Reporting</p>		<p>Developmental & Behavioral Screening</p> <p>Child Abuse and Neglect Reporting</p>
<p>1303.12 Insurance and bonding.</p>	<p>An agency must have an ongoing process to identify risks and have cost-effective insurance for those identified risks; a grantee must require the same for its delegates. The agency must specifically consider the risk of accidental injury to children while participating in the program. The grantee must submit proof of appropriate coverage in its initial application for funding. The process of identifying risks must also consider the risk of losses resulting from fraudulent acts by individuals authorized to disburse Head Start funds. Consistent with 45 CFR part 75, if the agency lacks sufficient coverage to protect the federal government's</p>		<p>MCHS carries insurance coverage specifically for students enrolled in the program in the event of an injury incurred while participating in the program.</p> <p>Similarly, CCS Board carries additional student liability insurance that covers Head Start children as well.</p> <p>CCS School Board carries liability insurance on all facilities, vehicles, and property as dictated by local, state, and federal law. ORC 3313.203 Liability insurance - indemnification</p>	<p>Child Liability Insurance</p> <p>CCS Board Policy and Procedure</p>	<p>CCS Board</p>	<p>Child Liability Insurance</p> <p>CCS Board Policy & Procedure</p>

	interest, the agency must maintain adequate fidelity bond coverage.		CCS Board carries liability insurance to protect the district from various risk situations to safeguard all programs that fall under the umbrella of the district.			
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Mercer County Head Start Policies and Procedures

P/P Topic:	Limitations & Prohibitions	P/P #:	
Part:	1303	PC Approval Date:	
Subpart:	<i>B – Administrative Requirements</i>	Last Reviewed Date:	
Section Title(s):	<i>Limitations & Prohibitions</i>	Implementation Responsibility:	CCS Board
Related Performance Standard(s):	1303.11	Monitoring Responsibility:	Treasurer

(A) Policy	644(e) - (e) Funds appropriated to carry out this subchapter shall not be used to assist, promote, or deter union organizing.
(B) Responsibility	CCS Board
(C) Procedure	No funds appropriated by the federal government shall be used to assist, promote, or deter union organizing.

Mercer County Head Start Policies and Procedures

P/P Topic:	Wage Comparability	P/P #:	
Part:	1303	PC Approval Date:	
Subpart:	<i>B – Administrative Requirements</i>	Last Reviewed Date:	
Section Title(s):	<i>Limitations & Prohibitions</i>	Implementation Responsibility:	Executive Director
Related Performance Standard(s):	1303.11	Monitoring Responsibility:	CCS Board

(A) Policy	<p>653 - (a) Comparability of Wages- The Secretary shall take such action as may be necessary to assure that persons employed in carrying out programs financed under this subchapter shall not receive compensation at a rate which is (1) in excess of the average rate of compensation paid in the area where the program is carried out to a substantial number of persons providing substantially comparable services, or in excess of the average rate of compensation paid to a substantial number of the persons providing substantially comparable services in the area of the person's immediately preceding employment, whichever is higher; or (2) less than the minimum wage rate prescribed in section 6(a)(1) of the Fair Labor Standards Act of 1938. The Secretary shall encourage Head Start agencies to provide compensation according to salary scales that are based on training and experience.</p> <p>(b) Limitation-</p> <p>(1) IN GENERAL- Notwithstanding any other provision of law, no Federal funds may be used to pay any part of the compensation of an individual employed by a Head Start agency, if such compensation, including non-Federal funds, exceeds an amount equal to the rate payable for level II of the Executive Schedule under section 5313 of title 5, United States Code.</p> <p>(2) COMPENSATION- In this subsection, the term "compensation"--</p> <p>(A) includes salary, bonuses, periodic payments, severance pay, the value of any vacation time, the value of a compensatory or paid leave benefit not excluded by subparagraph (B), and the fair market value of any employee perquisite or benefit not excluded by subparagraph (B); and</p> <p>(B) excludes any Head Start agency expenditure for a health, medical, life insurance, disability, retirement, or any other employee welfare or pension benefit.</p>
(B) Responsibility	Executive Director

<p>(C) Procedure</p>	<p>At a minimum, the Executive Director or designee will conduct a wage comparability study every 3 years.</p> <p>The wage comparability study MUST incorporate “like” grantees and “like” communities in which Mercer County Head Start program is conducted. The definition of “like” is any grantee with similar number of employees and / or students served. Likewise, wage comparability study should be conducted in those communities which are demographically similar to Mercer County. Mercer County is designated as a rural county. Wage comparability studies should be conducted on other rural counties and not those designated as urban.</p> <p>The wage study is to be presented to Policy Council and Board of Education and is to be used when reviewing wage scales and continuous improvement opportunities.</p>
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Mercer County Head Start Policies and Procedures

P/P Topic:	Restrictions of Political Activities	P/P #:	
Part:	1303	PC Approval Date:	
Subpart:	<i>B – Administrative Requirements</i>	Last Reviewed Date:	
Section Title(s):	<i>Limitations & Prohibitions</i>	Implementation Responsibility:	All staff
Related Performance Standard(s):	1303.11	Monitoring Responsibility:	CCS Board

(A) Policy	<p>656 - (a) State or Local Agency- For purposes of Chapter 15 of title 5, United States Code, any agency which assumes responsibility for planning, developing, and coordinating Head Start programs and receives assistance under this subchapter shall be deemed to be a State or local agency. For purposes of clauses (1) and (2) of section 1502(a) of such title, any agency receiving assistance under this subchapter shall be deemed to be a State or local agency.</p> <p>(b) Restrictions-</p> <p>(1) IN GENERAL- A program assisted under this subchapter, and any individual employed by, or assigned to or in, a program assisted under this subchapter (during the hours in which such individual is working on behalf of such program), shall not engage in--</p> <p>(A) any partisan or nonpartisan political activity or any other political activity associated with a candidate, or contending faction or group, in an election for public or party office; or</p> <p>(B) any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election.</p> <p>(2) REGISTRATION- No funds appropriated under this subchapter may be used to conduct voter registration activities. Nothing in this subchapter prohibits the availability of Head Start facilities during hours of operation for the use of any nonpartisan organization to increase the number of eligible citizens who register to vote in elections for Federal office.</p> <p>(3) RULES AND REGULATIONS- The Secretary, after consultation with the Director of the Office of Personnel Management, may issue rules and regulations to provide for the enforcement of this section, which may include provisions for summary suspension of assistance or other action necessary to permit enforcement on an emergency basis.</p>
(B) Responsibility	All Staff

<p>(C) Procedure</p>	<p>MCHS does not permit employees to participate in political activities during the employee's contracted work hours.</p> <p>MCHS does not permit employees to participate in the transportation of individuals to and or from voter polling locations.</p>
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Mercer County Head Start Policies and Procedures

P/P Topic:	Voter Registration Limitations	P/P #:	
Part:	1303	PC Approval Date:	
Subpart:	<i>B – Administrative Requirements</i>	Last Reviewed Date:	
Section Title(s):	<i>Limitations & Prohibitions</i>	Implementation Responsibility:	All staff
Related Performance Standard(s):	1303.11	Monitoring Responsibility:	CCS Board

(A) Policy	<p>656 - (a) State or Local Agency- For purposes of Chapter 15 of title 5, United States Code, any agency which assumes responsibility for planning, developing, and coordinating Head Start programs and receives assistance under this subchapter shall be deemed to be a State or local agency. For purposes of clauses (1) and (2) of section 1502(a) of such title, any agency receiving assistance under this subchapter shall be deemed to be a State or local agency.</p> <p>(b) Restrictions-</p> <p>(1) IN GENERAL- A program assisted under this subchapter, and any individual employed by, or assigned to or in, a program assisted under this subchapter (during the hours in which such individual is working on behalf of such program), shall not engage in--</p> <p>(A) any partisan or nonpartisan political activity or any other political activity associated with a candidate, or contending faction or group, in an election for public or party office; or</p> <p>(B) any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election.</p> <p>(2) REGISTRATION- No funds appropriated under this subchapter may be used to conduct voter registration activities. Nothing in this subchapter prohibits the availability of Head Start facilities during hours of operation for the use of any nonpartisan organization to increase the number of eligible citizens who register to vote in elections for Federal office.</p> <p>(3) RULES AND REGULATIONS- The Secretary, after consultation with the Director of the Office of Personnel Management, may issue rules and regulations to provide for the enforcement of this section, which may include provisions for summary suspension of assistance or other action necessary to permit enforcement on an emergency basis.</p>
(B) Responsibility	All Staff

(C) Procedure

Head Start funds cannot be used for the purpose of voter registration. However, other non-partisan voter registration entities may conduct such activities in a Head Start facility.

The Executive Director and Superintendent of Schools must give consent for this to occur.

Mercer County Head Start Policies and Procedures

P/P Topic:	Intrusive & Non-intrusive Procedures	P/P #:	
Part:	1303	PC Approval Date:	
Subpart:	<i>B – Administrative Requirements</i>	Last Reviewed Date:	
Section Title(s):	<i>Limitations & Prohibitions</i>	Implementation Responsibility:	All staff
Related Performance Standard(s):	1303.11	Monitoring Responsibility:	HCSM

(A) Policy	<p>657A - a) Definition- The term 'nonemergency intrusive physical examination' means, with respect to a child, a physical examination that-</p> <p style="text-align: center;">-</p> <p>(1) is not immediately necessary to protect the health or safety of the child involved or the health or safety of another individual; and</p> <p>(2) requires incision or is otherwise invasive, or involves exposure of private body parts.</p> <p>(b) Requirement- A Head Start agency shall obtain written parental consent before administration of any nonemergency intrusive physical examination of a child in connection with participation in a program under this subchapter.</p> <p>(c) Rule of Construction- Nothing in this section shall be construed to prohibit agencies from using established methods, for handling cases of suspected or known child abuse and neglect, that are in compliance with applicable Federal, State, or tribal law.</p>
(B) Responsibility	All Staff

<p>(C) Procedure</p>	<p>Mercer County Head Start at NO time will ever conduct any procedure that is deemed intrusive under this definition with the exception of life saving techniques.</p> <p>All medical procedures are to be conducted by the registered nurse on staff.</p> <p>Only staff with administration of medication training are permitted to administer medication as prescribed.</p> <p>Staff must obtain permission to conduct all non-intrusive procedures prior to the procedure.</p>
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Mercer County Head Start Policies and Procedures

P/P Topic:	Child Liability Insurance	P/P #:	
Part:	1303	PC Approval Date:	
Subpart:	<i>B – Administrative Requirements</i>	Last Reviewed Date:	
Section Title(s):	<i>Insurance & bonding</i>	Implementation Responsibility:	Executive Director
Related Performance Standard(s):	1303.12	Monitoring Responsibility:	CCS Board

(A) Policy	An agency must have an ongoing process to identify risks and have cost-effective insurance for those identified risks; a grantee must require the same for its delegates. The agency must specifically consider the risk of accidental injury to children while participating in the program. The grantee must submit proof of appropriate coverage in its initial application for funding. The process of identifying risks must also consider the risk of losses resulting from fraudulent acts by individuals authorized to disburse Head Start funds. Consistent with 45 CFR part 75, if the agency lacks sufficient coverage to protect the federal government’s interest, the agency must maintain adequate fidelity bond coverage.
(B) Responsibility	Executive Director
(C) Procedure	MCHS carries insurance coverage specifically for students enrolled in the program in the event of an injury incurred while participating in the program.