

Head Start Monthly Report November 2024

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.

Credit Card Reports \$7889.67

10/1/24	189.00	Rachel's Cakes	Rockford Playground
10/9/24	206.00	MC Fairgrounds	Family Engagement
10/24/24	5351.06	Webstaurant	Kitchen Cooler
10/24/24	55.00	Webstaurant	Kitchen
10/8/24	921.94	Delta	A. Esser
10/14/24	305.50	Cbus Marriott	A. Esser
10/25/24	59.92	Uber	A. Esser
10/28/24	28.00	Dayton Airport	A. Esser
10/28/24	593.35	Embassy Suites	A. Esser
10/28/24	49.57	Uber	A. Esser
10/16/24	130.33	Friendly Market	Policy Council

A. Program Information Summary

District affiliated events Director participated in include: Board meeting, Custodial meetings, Operational meetings for Ed Complex, Maintenance operations, Technology supply and upgrades

External committees / meetings affiliated with Head Start – Weekly Directors meetings, OHSAI Executive Board, OHSAI Community of Learners Director , OHSAI Futures , FCFC, Regional Roundtable for HSPPS, DCY – ECE, HMG – HFA, Tri Star presentation, NWD planning

Internal committees / meetings – Policy Council meetings, Administrative meetings, Recruitment, Intake meetings accepting children, monthly OHS call, Momentum discussion about MH Consultative Services, meetings with all programmatic managers, Intakes, Conscious Discipline training planning meetings, NHSA ELC, Momentum – MHC restructure, Mission Statement Development

Trainings provided – Keeping Children Safe, Income verification, DCY Licensing
Trainings received – HHS OIG reporting,

In addition to the tasks mentioned, Director attended the Regional Roundtable in Atlanta Georgia for training on new HSPPS.

The program continues to function under a Non-Federal match Waiver

Report on 30 & 45-day screening requirements – (7) developmental and behavioral screenings were not completed within given timelines (7% error), (4) hearing screens were not completed within given timelines (4% error), (2) vision screens were not completed within given timelines (2%) error.

Report on Health Requirements – HCT / HgB – 45 missing, Dental – 33 not completed, HT/WT – 12 not completed, Hearing Screening – 12 missing, Lead – 33 missing, Physical – 2 missing, vision screens – 16 missing

Education –

Mental Health – Meeting with MH Consultant Contractor to review expectations for new HSPPS.

Disabilities –

Health –

ERSEA – not fully enrolled, Coldwater site off to slow start

Family Engagement - Trunk or Read at Fairgrounds

B. Enrollment / Attendance

Enrollment by program option – 116 overall

Attendance by program option – Overall 87.91%

Part-day – 85.71%

Full-day – 90.68%

Enrollment by Program Option:

Half Day PY Head Start	22
Full Day School Year (6 hour day)	91

C. CACFP report – CACFP claimed meals

Month Served	October 2024
Total Days Attendance	19 days
Total Breakfast	1754
Total Lunches	1951
Total Snacks	1549
Total Meals	5254

D. Financial Audit – Completed

E. Annual Self-Assessment

- Completed May 2024

F. Community Assessment - Completed

G. Communication and Guidance from the Secretary

Facilities Guidance

Use of Federal Early Childhood Program Funds to Improve Access to Housing-Related Supports for the Early Childhood Workforce in Tribal Communities

ACF-OHS-IM-24-05

Reporting Child Health and Safety Incidents ACF-OHS-IM-24-06

Fiscal Year 2025 Monitoring Process for Head Start Recipients

Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming – Technical Updates

Final Rule to Delay Effective Date for Increasing the CLASS Instructional Support Domain Competitive Threshold

Attachments to report:

1302 Subpart B HSPPS

Program Schedule Policy

Respectfully submitted,

Amy Esser

Executive Director

				Total Purchasing Activity	\$508.65
AMY ESSER		CREDITS	PURCHASES	CASH ADV	TOTAL ACTIVITY
0000-10000000-100000		\$0.00	\$7,759.34	\$0.00	\$7,759.34
ACCOUNTING CODE:					
Purchasing Activity					
Post Date	Tran Date	Reference Number	Transaction Description	Amount	
10-01	09-30	55417344274172747386893	RACHELS CAKES ANNA OH P.O.S.: 615660611 SALES TAX: 10.86	189.00	
10-09	10-08	55546504283113517121286	MERCER COUNTY FAIRGROU CELINA OH	206.00	
10-24	10-23	02653904297200089695825	THE WEBSTRAURANT STORE LANCASTER PA	5,351.06	
10-24	10-23	02653904297200089696006	THE WEBSTRAURANT STORE LANCASTER PA	55.00	
Total Purchasing Activity				\$5,801.06	
Travel Activity					
Post Date	Tran Date	Reference Number	Transaction Description	Amount	
10-08	10-07	55417344282872821681289	DELTA 00622737031980 DELTA.COM CA ESSER/AMY DEPART: 10-23-24 P.O.S.: SALES TAX: \$0.00 DAY DL Z ATL DL D DAY	921.94	
10-14	10-11	55432864286208190910468	COLUMBUS MARRIOTT NW DUBLIN OH 23855 ARRIVAL: 10-09-24	305.50	
10-25	10-24	57540244298744547716667	UBER *TRIP 8005928996 CA P.O.S.: RLOJ46UC SALES TAX: 0.60	59.92	
10-28	10-25	22303794300004699239005	99938 - DAYTON INTERNA VANDALIA OH P.O.S.: P93004557 SALES TAX: 0.84	28.00	

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Continued on next page

INDIVIDUAL CARDHOLDER ACTIVITY					
Travel Activity					
Post Date	Tran Date	Reference Number	Transaction Description	Amount	
10-28	10-25	55436874300263005730939	EMBASSY SUITES ATLA BK ATLANTA GA 1517699 ARRIVAL: 10-23-24	593.35	
10-28	10-25	57540244299712738971886	UBER *TRIP 8005928996 CA	49.57	
Total Travel Activity				\$1,958.28	
CONNIE ROSE		CREDITS	PURCHASES	CASH ADV	TOTAL ACTIVITY
		00.00	00.00	\$0.00	00.00
ACCOUNTING CODE:					
Purchasing Activity					
Post Date	Tran Date	Reference Number	Transaction Description	Amount	
10-01	09-30	55417344274172747386893	SCHOOL DTEBOOKS DAYTON OH	2.50	
10-01	09-30	55417344274172747386893	EVERY DAY FRIES ONLY TYSONS CORNER VA	289.00	
10-03	10-02	5546504283113517121286	WAL MART #1100 CELINA OH	284.46	
10-04	10-03	5546504283113517121286	WAL MART #1100 CELINA OH	29.44	
10-07	10-04	5546504283113517121286	STATE BOARD OF EDUCATI COLUMBUS OH	25.00	
10-07	10-04	5546504283113517121286	STATE BOARD OF EDUCATI COLUMBUS OH	25.00	
10-07	10-04	5546504283113517121286	STATE BOARD OF EDUCATI COLUMBUS OH	25.00	
10-07	10-04	5546504283113517121286	STATE BOARD OF EDUCATI COLUMBUS OH	25.00	
10-07	10-04	5546504283113517121286	STATE BOARD OF EDUCATI COLUMBUS OH	25.00	
10-08	10-07	55426841080400445368444	WAL SUPERCENTER #1100 CELINA OH	889.00	
10-08	10-07	55426841080400445368444	WAL SUPERCENTER #1100 CELINA OH	889.00	
10-11	10-10	55436874300263005730939	QUICK INN CANTAMONICA CA	144.00	
10-16	10-15	05140484289720211700357	FRIENDLY MARKET CELINA OH	130.33	
10-16	10-15	55410014205141007002000	WAL MART #1100 CELINA OH	2.50	
10-16	10-15	55410014205141007002000	OHIO TROOP 200 200 2003 OH	240.00	
10-22	10-21	55436874300263005730939	WAL SUPERCENTER #1100 CELINA OH	889.00	

HEAD START - 2024 GRANT

525-9924

	FEDERAL BUDGET	OTHER SOURCES	TOTAL REVENUES	REVENUE RECEIVED	REMAINING FUNDING
Federal Revenue	2,158,505.00	-	2,158,505.00	1,378,444.32	780,060.68
CACFP Revenue	-	100,000.00	100,000.00	63,566.42	36,433.58
Other Local	-	-	-	-	-
Refund prior year exp	-	-	-	-	-
Board advance	-	-	-	-	-
Total	2,158,505.00	100,000.00	2,258,505.00	1,442,010.74	816,494.26

EXPENSES

	FEDERAL BUDGET	OTHER SOURCES	TOTAL BUDGET	ACTUAL EXPENDED	EXPENDABLE BALANCE	ENCUMBERED/ REQUISITIONS	REMAINING BALANCE
Salary	976,269.00	-	976,269.00	844,155.69	132,113.31	-	132,113.31
Fringe Benefits	746,023.00	-	746,023.00	504,613.23	241,409.77	2,070.00	239,339.77
Programming	223,486.00	-	223,486.00	77,984.58	145,501.42	23,785.75	121,715.67
Supplies	159,912.00	58,687.00	218,599.00	125,123.55	93,475.45	63,495.11	29,980.34
Capital Outlay	-	-	-	-	-	-	-
Other Expenditures	5,270.00	-	5,270.00	6,025.80	(755.80)	-	(755.80)
PA22 subtotal	2,110,960.00	58,687.00	2,169,647.00	1,557,902.85	611,744.15	89,350.86	522,393.29

Training & Technical Services

Training & technical serv (job code 400)	419	22,835.00	-	22,835.00	14,966.20	7,868.80	9,374.00	(1,505.20)
Staff out of town travel	439	22,068.00	-	22,068.00	16,508.81	5,559.19	1,243.60	4,315.59
Subtotal Purch Service		44,903.00	-	44,903.00	31,475.01	13,427.99	10,617.60	2,810.39

Training & Tech Supplies

Subtotal Supplies		2,642.00	-	2,642.00	2,266.72	375.28	196.00	179.28
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T&TA -PA20

	47,545.00	-	47,545.00	33,741.73	13,803.27	10,813.60	2,989.67	
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Return of Board Advance

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TOTALS

	2,158,505.00	58,687.00	2,217,192.00	1,591,644.58	625,547.42	100,164.46	525,382.96	
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Federal Grant Expenditures
1,528,078.16

149,633.84

TOTAL REVENUE OVER/UNDER TOTAL EXPENDITURES

(149,633.84)

CATEGORY	RATE	HOURS	AMOUNT	COMMENTS
PC	48.83	4	195.32	
BOARD				
AT HOME ACTIVITIES				
AA				
CC				
LAKE				
RF				
CW				
SSC				
TT				
TOTAL				
Parent VOLS				
Community VOLS			70	
Total				
DONATED GOODS				
UTILITIES			2142	
ECE			7083.34	
MHC			200	
TOTAL				
CCS SUPPORT				
SLP			5259.39	
IT SUPPORT			1163.73	
ASST TR I			506.34	
ASST TR II			373.09	
SUPT SEC			444.17	
CUSTODIAL			4949.54	
MAINTENANCE			1368.04	
TREASURER			657.37	
FRINGE			7769.79	
BENEFITS			433.71	
TOTAL			22904.66	
MO TOTAL			36,595.32	
YTD TOTAL			323,995.38	

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-OHS-PI-24-06	2. Issuance Date: 10/31/2024
	3. Originating Office: Office of Head Start	
	4. Key Words: Head Start Workforce; Wages; Benefits; Mental Health; Quality Improvement	

PROGRAM INSTRUCTION

TO: All Head Start Preschool and Early Head Start Grant Recipients

SUBJECT: Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming – Technical Updates

INFORMATION:

On August 21, 2024, the Administration for Children and Families (ACF) published a final rule in the Federal Register, [Supporting the Head Start Workforce and Consistent Quality Programming](#). The rule updates the Head Start Program Performance Standards (the Performance Standards) to increase support and stability for the Head Start workforce. The changes also improve the quality of services Head Start programs provide to children and families.

This Program Instruction (PI) notes a few technical updates to [ACF-OHS-PI-24-05](#), which summarizes the final rule and outlines changes to the Performance Standards. These technical updates are minor corrections for typographic errors or omissions that do not substantively change the policies described in the final rule.

First, this PI clarifies that the final rule effective date was incorrectly listed as the date of publication, August 21, 2024. The effective date should have been October 21, 2024, to comply with the 60-day delay required by the Congressional Review Act.

The notification regarding the effective date does not change any of the compliance dates specified in the rule. Grant recipients may still implement new flexibilities starting from the date of publication, August 21, 2024. This includes the provision that allows programs to adjust a family's gross income to account for excessive housing costs for the purposes of determining eligibility for Head Start services ([45 CFR §1302.12\(i\)\(1\)\(ii\)](#)), as well as those related to qualification requirements for mental health consultants ([45 CFR §1302.91\(e\)\(8\)\(ii\)](#)) and the annual update to the community assessment ([45 CFR §1302.11\(b\)\(5\)](#)). Programs were able to start using this flexibility from the beginning of the current 2024–2025 program year and this remains unchanged.

This PI also notes two other technical updates to the regulatory text. The final rule inadvertently included an incorrect citation in the requirements for family partnership services, and left out the August 1, 2028, compliance date for staff benefit requirements. A formal correction for both of these issues was published in the [Federal Register](#) on October 31, 2024.

OHS will continue to provide [direction, guidance, and resources](#) that support Head Start programs to understand and implement changes to the Performance Standards.

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

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-OHS-PI-24-07	2. Issuance Date: 11/06/2024
	3. Originating Office: Office of Head Start	
	4. Key Words: Classroom Assessment Scoring System (CLASS®); Designation Renewal System (DRS); Head Start Program Performance Standards; Competition	

PROGRAM INSTRUCTION

TO: All Head Start Preschool and Early Head Start Grant Recipients

SUBJECT: Final Rule to Delay Effective Date for Increasing the CLASS® Instructional Support Domain Competitive Threshold

INSTRUCTION:

On November 6, 2024, the Administration for Children and Families (ACF) published a final rule in the [Federal Register](#) that delays the effective date for increasing the competitive threshold of the Classroom Assessment Scoring System (CLASS®) Instructional Support domain. The CLASS competitive threshold is one condition used to determine whether a Head Start agency will be subject to an open competition under the Designation Renewal System (DRS).

The effective date in the Head Start Program Performance Standards (the Performance Standards) that raises the CLASS Instructional Support competitive threshold from 2.3 to 2.5 was August 1, 2025. **This final rule officially delays the effective date to August 1, 2027.**

Background

On August 27, 2020, ACF published a final rule on DRS changes to improve how the Office of Head Start (OHS) determines whether a Head Start agency will be subject to an open competition to receive another five-year grant. Among other policy changes, this rule established a new competitive threshold for the CLASS Instructional Support domain, one of the seven conditions requiring a Head Start program to enter open competition. The established competitive threshold for the Instructional Support domain was 2.3, and was set to increase to 2.5 on August 1, 2025.

The graduated approach established by the 2020 final rule was designed to allow sufficient time for grant recipients to make necessary quality improvements. However, the unexpected pause in CLASS observations due to the COVID-19 pandemic shortened the five-year implementation time frame to less than two years. The fiscal year 2024 OHS monitoring cycle (2023–2024) was the first time the 2.3 competitive threshold for Instructional Support was fully implemented.

OHS is publishing this final rule to allow programs ample time before the increased 2.5 competitive threshold goes into effect.

This decision to delay the Instructional Support competitive threshold increase is also based on OHS' anticipated timeline for adopting CLASS 2nd Edition. In 2022, the developer introduced an updated CLASS tool which requires training, technical assistance, and certification procedures for both OHS and Head Start grant recipients. OHS will ensure necessary systems and supports are in place before its monitoring system implements the updated version.

Additionally, the August 2024 publication of the [Supporting the Head Start Workforce and Consistent Quality Programming](#) final rule in the Federal Register changed many requirements in the Performance Standards. Delaying the CLASS Instructional Support competitive threshold increase will allow Head Start programs the time and attention they need to implement the revised Performance Standards.

Please contact your Regional Office with any questions about the extension of the CLASS Instructional Support competitive threshold increase.

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

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-OHS-IM-24-04	2. Issuance Date: 10/21/2024
	3. Originating Office: Office of Head Start	
	4. Key Words: Facilities; Depreciation; Real Property	

Information Memorandum

TO: Head Start Grant Recipients and Delegate Agencies

SUBJECT: Facilities Guidance

INFORMATION:

The Office of Head Start (OHS) is committed to the provision of services in high-quality [facilities](#) with safe indoor and outdoor learning environments. This Information Memorandum (IM) is intended to support recipients in understanding the Head Start application and funding process for facilities activities. OHS is providing this guidance based on the [recently revised Head Start Program Performance Standards](#) (the Performance Standards) published on August 21, 2024.

This IM supersedes ACF-IM-HS-17-01.

Thank you for your work on behalf of Head Start children and families.

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

See [Facilities Guidance Attachment](#)

Facilities Guidance Attachment

ACF-OHS-IM-24-04

The Office of Head Start (OHS) is committed to the provision of child development services in high-quality facilities with safe indoor and outdoor learning environments. This Information Memorandum (IM) is intended to support recipients in understanding the Head Start application and funding process for facilities activities. OHS is providing this guidance based on the [recently revised Head Start Program Performance Standards](#) (the Performance Standards) published on August 21, 2024.

This IM attachment supersedes ACF-IM-HS-17-01.

Head Start grant funds in approved budgets may be used for the payment of rent under operating leases and for repairs and minor renovations to facilities. The use of grant funds to make payments under a capital lease, as noted in [45 CFR §75.465\(c\)\(5\)](#) and defined by Generally Accepted Accounting Principles (GAAP), must either be limited to the amount that would be allowed if the nonfederal entity purchased the property on the date the lease agreement was executed or, if the recipient will acquire title under capital lease, approved in accordance with [45 CFR §§1303.44 and 1303.45](#).

Other facilities activities using Head Start grant funds, including purchase, construction, and major renovations, require a separate application for funding ([45 CFR §§1303.44–45](#)).

The term "Head Start" is used inclusively for Head Start Preschool, Early Head Start, Early Head Start-Child Care Partnerships, Migrant and Seasonal Head Start, and American Indian and Alaska Native programs. Find definitions of other important terms and phrases used throughout this IM and the Performance Standards at [Terms, 45 CFR §1305.2](#).

Regulations applicable to [facilities](#) activities funded by OHS are found primarily at:

- Facilities, [45 CFR §1303 Subpart E](#) of the Performance Standards
- [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Health and Human Services \(HHS\) Awards](#) (the Uniform Guidance)
- [HHS Grants Policy Statement \(GPS\)](#), including subsequent [revisions or amendments](#)

Additional guidance is available below and on the [Head Start website](#).

Availability of Funds

Recipients are required to submit one-time funding applications for facilities activities beyond the scope of those that are part of a program's approved budget. This ensures OHS can fully understand real property needs. However, the availability of these funds is often limited and OHS typically cannot fund all requests for facilities activities.

Requests for facilities funding are subject to funding availability and priorities established by OHS and reflected in notices of funding opportunity.

Planning

Recipients are encouraged to engage in careful planning to ensure proposed facility activities address identified health and safety issues, reflect the results of a community assessment, and are eligible for funding under 45 CFR §1303.42. Guidance and other materials to support planning for real property activities are available on the Head Start website.

Recipients may submit a written request for funding under 45 CFR §1303.43 for reasonable fees and costs necessary to submit an application under 45 CFR §§1303.42 and 1303.44. Once HHS approval is granted to use federal funds for the following and related preliminary activities, the funds are allowable regardless of the outcome of the preliminary eligibility:

- Feasibility studies
- Title commitment or title search
- Cost estimates
- Initial indoor and outdoor environmental testing to ensure suitability of the facility project being considered

It is strongly recommended that recipients discuss facilities projects with their regional program specialist and grants management specialist well before submitting a full application under 45 CFR §§1303.44 and 1303.45.

Applications

Recipients may submit an application to the Head Start Enterprise System (HSES) to use Head Start funds to [purchase](#) or [construct](#) facilities, and for [major renovation](#) of facilities owned by the recipient or leased from a third party.

Applications for facilities funding require the use of the [SF-429 Real Property Status Report](#) with attachment SF-429-B Request to Acquire, Improve, or Furnish. Additional information needed to meet the requirements of 45 CFR §§1303.44 and 1303.45 must accompany the SF-429 and SF-429-B forms.

Note that while a separate supplemental application is needed when requesting additional federal funds, an additional 1303 application is not required for [repairs](#) or [minor renovations](#). However, such activities may require prior written ACF approval if they meet the conditions of 45 CFR §75.308. An example is a kitchen repair that includes the purchase of equipment for which prior written approval is required by 45 CFR §75.308(c)(1)(xi).

Federal Interests

A [federal interest](#) in real property is created when a recipient uses Head Start or other federal funds to purchase or construct [real property](#) or conduct major renovations on leased or owned

property. Protection of the federal interest is required by the Performance Standards, [45 CFR §75.323](#) of the Uniform Guidance, and GPS. The federal interest includes:

- Total project costs paid with federal funds
- Those amounts awarded directly from OHS
- Amounts claimed by the recipient as cost sharing or matching for the project

Following a grant competition, recipients need to be prepared to assume responsibility for facilities with federal interest.

Recipients are required to file a notice of federal interest in the official real property records for the jurisdiction where the real property is or will be located, except modular units ([45 CFR §1303.46\(b\)\(1–3\)](#)). Notices of federal interest for modular units must be posted on the units ([45 CFR §1303.46\(b\)\(4\)](#); [45 CFR §75.323](#)). The Performance Standards at [45 CFR §§1303.46–49](#) detail requirements for timing, content, where to file or post notices of federal interest, and instructions for submitting copies of filed or posted notices. A federal interest cannot be defeated by a recipient's failure to file a required notice of federal interest ([45 CFR §1303.46\(a\)](#)).

If a grant recipient receives federal funds to purchase, construct, or renovate a facility on leased property or land, the lease or other occupancy agreement must be ([45 CFR §1303.50](#)):

- At least 30 years for purchase or construction of a facility
- At least 15 years for a major renovation or placement of a modular unit

Lease or occupancy agreements that include the language under [45 CFR §§1303.50](#) and [1303.47](#) may be recorded in the official real property records for the jurisdiction where the facility is located to serve as a notice of federal interest. Recipients are encouraged to consult their regional grants management specialist and program specialist to assure the lease contains the required terms and conditions.

Repairs, Minor Renovations, and Major Renovations

Recipients should familiarize themselves with the definitions of these terms in [45 CFR §1305.2](#).

Repairs and minor renovations, as defined, do not result in a federal interest or require the filing of a notice of federal interest. Major renovations require full compliance with [45 CFR §1303 Subpart E](#). While not common, a recipient may engage in a collective group of renovation activities in a single facility — the aggregate value of which exceeds \$350,000, or higher to match any additional increases made to the simplified acquisition threshold — to address a specific part or feature of a facility.

If a recipient intends to spend more than \$350,000 (or higher to match any additional increases made to the simplified acquisition threshold) for a major renovation or a collective group of renovation activities, the recipient must submit to ACF — before starting the proposed repairs — a certification from a licensed, independent architect or engineer. The certification must indicate that the expenditures identified as repairs do not add significant value to the real property to be

repaired or extend its useful life. If it is not provided, the activity will be classified as a major renovation and compliance with 45 CFR §1303 Subpart E is required.

Head Start Act Sec. 644(g)(3) applies the [Davis-Bacon and Related Acts](#) to contractors and subcontractors engaged in covered Head Start facility construction and renovation activities in excess of \$2,000. Covered Davis-Bacon Act activities are construction, alteration, or repairs including painting or decorating. If more than \$2,000 of Head Start funds are used toward the cost of covered activities, the Davis-Bacon Act applies. Recipients engaging in facilities activities of any type should familiarize themselves with the [requirements](#) of the Davis-Bacon Act to assure compliance.

Financing, Refinancing, and Pledges of Collateral

Prior ACF approval is required in all circumstances where real property subject to a federal interest is pledged as collateral (45 CFR §1303.48(a)). Such circumstances include mortgages, refinancing of existing facilities debt, and general or “blanket” pledges of collateral. Recipients requesting prior approval to use property subject to a federal interest as collateral must submit [SF-429 Real Property Status Report](#) and attachment SF-429-C Disposition or Encumbrance Request.

The Performance Standards require that loan agreements with third-party lenders for property subject to a federal interest contain language providing ACF with certain rights, as described in 45 CFR §1303.49(a)(1–7). These include:

- Notice of any borrower default in payment or performance
- An opportunity to cure the default
- The right to direct assignment of the loan to another recipient

Recipients are also required to immediately notify ACF of any default in a loan agreement secured by property subject to a federal interest (45 CFR §1303.49(b)). Recipients who successfully compete for a new service area may be required by OHS to accept facilities or assignment of loans associated with facilities continuing in Head Start use.

Recipients should be aware that loans with short-term maturity dates of less than 15 years (interest-only) will not generally be approved by ACF. A capital lease resulting in acquisition of title to real property requires prior ACF approval. It will only be considered in those rare instances where the recipient acquires title to the property but the cost of title acquisition under the capital lease does not exceed the value of the property at the time the capital lease is or was entered into.

As noted below, absent prior ACF approval of a capital lease, rental costs under leases that are required to be treated as capital leases under GAAP are allowable only up to the amount that would be allowed had the nonfederal entity purchased the property on the date the lease agreement was executed. 45 CFR §75.465(c)(5).

Subordination Agreements

A subordination agreement is a legal contract between ACF and a lender that allows the lender to establish first lien status on property already subject to a federal interest. Only ACF can agree to a subordination of the federal interest to the rights of a lender. Common situations where subordination agreements are requested include:

- Use of Head Start funds as a down payment with an accompanying mortgage for the balance of the purchase price
- When property subject to an existing mortgage is refinanced after acquisition

Recipients requesting a subordination agreement from ACF must submit SF-429 Real Property Status Report and attachment SF-429-C.

When the amount of federal funds already contributed to the facility prior to the subordination exceeds the amount to be provided by the lender seeking subordination, [45 CFR §1303.51](#) requires the recipient to show that funding is not available without subordination of the federal interest. This could be shown, for example, by a letter from the proposed lender stating that it will not fund the proposed loan without subordination of the federal interest.

Recipients are encouraged to consult their regional grants management specialist prior to submitting a subordination request. This will ensure that the proposed subordination agreement includes all required terms and conditions, and that all supporting materials (e.g., an independent appraisal of the current value of property at issue and proposed loan documents) are completed and available to accompany the subordination request.

Leases

Facility leases are classified for accounting purposes as either operating or capital leases. To determine allowable costs, property subject to a capital lease is treated as though it were owned by the recipient ([45 CFR §75.465\(c\)\(5\)](#)), while the reasonable costs of operating leases are ongoing operating expenses. Capital leases resulting in the acquisition of title by the lessee (recipient) are sometimes referred to as lease-purchase agreements.

Sale and leaseback agreements are treated similarly to capital leases ([45 CFR §75.465\(c\)](#)). If a recipient is party to a less-than-arms-length lease as described in [45 CFR §75.465\(c\)\(1–4\)](#), charges against the Head Start award are also limited in accordance with [45 CFR §75.436](#).

Rental costs under capital leases (except where previously approved in writing by ACF as a purchase), sale and leaseback agreements, and less-than-arms-length lease arrangements are allowable only up to the amount that would be allowed had the recipient owned the leased property. This amount includes expenses such as depreciation, maintenance, taxes (if the recipient is not exempt), and insurance ([45 CFR §75.436](#)).

Depreciation

Recipients may charge their Head Start award for allocable and allowable depreciation of recipient-owned facilities used for Head Start program purposes ([45 CFR §75.436](#)). Allowable annual depreciation is generally the acquisition cost of a facility (excluding land) divided by the useful life of the facility as established in the recipient's financial statements.

Depreciation must be adjusted (allocated) to reflect the extent of Head Start usage of the facility. It cannot include any portion of the cost of the facility (acquisition or major renovation) acquired through the use of or claimed as nonfederal match for Head Start funds (45 CFR §75.436(b–d)). For example, if the acquisition cost of a recipient-owned facility, excluding land, is \$800,000 and its useful life is 40 years, allowable annual depreciation is \$20,000 per year if the facility is used 100% for Head Start purposes and no federal funds or nonfederal match have contributed to the acquisition cost of the facility.

Scenario 1: If only 60% of the facility is used for Head Start services, the amount of annual allowable depreciation noted above must be reduced to 60% of the otherwise allowable amount, resulting in depreciation of \$12,000.

Scenario 2: If 30% of the cost of the facility was paid with Head Start funds, 30% of the amount of annual allowable depreciation noted above must be deducted, leaving 70% of the otherwise allowable amount or \$14,000.

Scenarios 1 and 2 combined: If only 60% of the facility is used for Head Start purposes and 30% the cost of the facility was paid with Head Start funds, the amount of annual allowable depreciation noted above must be adjusted for both extent of Head Start use and federal share.

- Step 1: Adjustment for Head Start usage at 60% = \$12,000.
- Step 2: A further 30% reduction of the amount arrived at in Step 1 (70% x \$12,000) produces final allowable depreciation in the amount of \$8,400.

Charges for depreciation must be supported by adequate depreciation and property records, and physical inventories must be taken at least once every two years (45 CFR § 75.436(e)). Allowable amounts of annual depreciation may be charged against the recipient's Head Start award or claimed as nonfederal match if the recipient foregoes the charging of otherwise allowable depreciation.

Reporting and Recordkeeping

All recipients are required to complete and submit real property status information annually using the [SF-429 Real Property Status Report](#), including attachment SF-429-A General Reporting. Additional information must be reported for each piece of property in which a [federal interest](#) exists, even if the recipient has not filed or posted the required notice of federal interest (45 CFR §1303.46(a)).

Recipients must retain records pertinent to the lease, purchase, construction, or renovation of a facility funded in whole or in part with Head Start funds for as long as the recipient owns or

occupies the facility, plus three years (45 CFR §1303.54). In the circumstances identified in 45 CFR §75.361(a–f), record retention may be required for periods in excess of three years. If a recipient is charging depreciation to its Head Start award, those charges must be supported by adequate property records supporting acquisition cost and useful life, and physical inventories must be taken at least once every two years (45 CFR §75.436(e)).

Valuation and Matching

The determination of value must be made by an independent real property appraiser certified or licensed in the state where the property is located (45 CFR §75.306(i)(1)). The appraiser must be licensed for the type of property appraised, generally commercial real estate. An appraisal more than three years old cannot be used to establish the current value of real property. The appraisal can be conducted on-site or virtually (45 CFR §1303.44(a)(7)).

Fair market rental value is the amount that a recipient would have to pay to rent comparable space in the community. The claimed value of donated space must not exceed the fair market rental value of comparable space, as established by an independent appraisal of comparable space in a privately-owned building in the same locality (45 CFR §75.306(i)(3)).

To establish fair market rental value of donated space from an unrelated party, the required fair market rental value may be established by an appraiser as described above, or by a licensed and independent real estate broker or agent familiar with the rental market in the local community. An appraisal more than three years old cannot be used to establish current fair market rental value of donated space.

If space is donated by a related party, the amount of matching the recipient may claim is limited to the amount that could have been claimed had the recipient been the titleholder of the property. The matching is generally those amounts described in 45 CFR §75.436.

Disposition

When real property subject to a federal interest is no longer needed for program purposes (45 CFR §75.318(b)), recipients must request that ACF provide disposition instructions for the property (45 CFR §75.318(b–c)). Disposition requests are made using [SF-429 Real Property Status Report](#) and attachment SF-429-C Disposition or Encumbrance Request.

ACF may also instruct a recipient to dispose of real property if the recipient is no longer funded to provide services in the area in which the real property is located. This may occur when a recipient relinquishes its Head Start award, is de-funded by OHS, or does not retain the service area as a result of designation renewal competition.

A recipient may request that real property subject to a federal interest be used in another federally sponsored program offered by the recipient with a purpose similar to Head Start programs (45 CFR §75.318(b)(2)). If use in another program is not possible or not approved, ACF may direct the recipient to undertake one of three disposition options.

1. The recipient may be instructed to retain the property title subject to a federal interest and compensate ACF for the value of the federal interest in the property (45 CFR §75.318(c)(1)).
2. ACF may direct the recipient to sell the property, allocating the proceeds between ACF and the recipient based on their relative interests in the property (45 CFR §75.318(c)(2)).
3. The recipient may be directed to transfer the property title to a third party with compensation for the value of the recipient's share of the property (45 CFR §75.318(c)(3)).

With prior ACF approval, 45 CFR §75.318(c)(1) allows the recipient to use the net proceeds of the sale of property subject to a federal interest to offset the cost of replacement property acquired under the same federal award. Since the option of using sale proceeds to offset the cost of replacement property did not uniformly exist under regulations applicable prior to December 26, 2014, recipients proposing to use sale proceeds to acquire replacement property must formally adopt the Uniform Guidance for all of their existing facilities awards. This requirement is reflected in the recipient's fiscal policies and procedures and approved by their governing body and Policy Council.

Recipients may indicate their use or disposition preference on the disposition request. However, ACF has the discretion to instruct a recipient to engage in another method of disposition which may better suit program needs. If a disposition instruction requires compensation by ACF of a recipient's share in real property, the recipient must provide documentation of the source, amount and any restrictions or condition associated with funding for any claimed recipient share. Costs of purchase, construction, or major renovations to the property previously claimed by the recipient as cost sharing or match to the Head Start award are part of the [federal interest](#). Failure to comply with disposition instructions issued by ACF may result in denial of close-out funding or adverse action against the recipient.

To determine the current value of the federal interest and recipient share in connection with disposition of real property, current fair market value must be established by an independent real property appraiser certified or licensed in the state where the property is located (GPS). Once current fair market value is established, the value of the federal interest and recipient equity, and other third-party interest or equity if applicable, are determined by calculating the respective federal, recipient, and any third-party contributions to the property. The resulting percentages are applied to the current fair market value.

All claim amounts included in the calculation of recipient contribution must be adequately documented. They cannot include funds or property subject to a third-party use restriction, reversionary interest, encumbrance, or similar condition. In the event of disposition requiring ACF compensation of recipient share, it is the responsibility of the recipient to produce adequate documentation to establish recipient equity upon receipt of disposition instructions.

If it is necessary to establish federal interest and recipient equity in connection with a disposition, recipients are encouraged to work closely with their regional program specialist and grants management specialist throughout the disposition process.

Conclusion

Using Head Start funds to purchase, construct, and majorly renovate real property provides an important opportunity for recipients. It's a way to ensure that services to children and families are provided in high-quality facilities that support school readiness and enhance the delivery of those comprehensive services. Real property activities funded by OHS represent significant investments intended to benefit children and families in the local community over extended periods of time.

Although recipients are permitted to hold title to real property acquired or improved with OHS funds, the property is held in trust by the recipient as trustee for the beneficiaries of the project or program under which the property was acquired or improved (45 CFR §75.323). Compliance with the requirements of 45 CFR Part 1303 Subpart E and 45 CFR Part 75 is mandatory to ensure ongoing availability of real property for program use. The requirements also protect the recipient from future risk of audit issues, monitoring findings, and potential disallowance of previously awarded funds.

Recipients considering real property activities covered by the Performance Standards, Uniform Guidance, and Grants Policy Statement are encouraged to consult their program specialist and grants management specialist early in the project development process to ensure compliance with all requirements that apply to real property activities funded by OHS.

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No. ACF-OHS-IM-24-06	2. Issuance Date: 11/07/2024
	3. Originating Office: Office of Head Start	
	4. Key Words: Child Incidents; Reporting; Health and Safety	

Information Memorandum

TO: All Head Start Grant Recipients

SUBJECT: Reporting Child Health and Safety Incidents

INFORMATION:

The Head Start Program Performance Standards (the Performance Standards) at [45 CFR §1302.102\(d\)\(1\)\(ii\)](#), updated on August 21, 2024, require programs to submit reports, as appropriate, to the responsible U.S. Department of Health and Human Services (HHS) official immediately, but no later than seven calendar days, following an incident. This includes reports of any significant incident that affects the health or safety of a child.

This Information Memorandum (IM) clarifies reporting requirements of 45 CFR §1302.102(d)(1)(ii–iii), including:

- The responsible HHS official to whom programs must report
- The reporting timeframe
- Consequences for failure to report during the given timeframe
- Circumstances under which the obligation to submit a report for significant incidents regarding the health and safety of children applies
- Examples of significant child health and safety incidents that must be reported to HHS and the Office of Head Start (OHS)

This IM supersedes ACF-IM-HS-22-07.

Reportable Incidents That Affect the Health and Safety of Children

Grant recipients are required to report all significant incidents that affect the health and safety of a child that occur in a Head Start setting where services are provided (e.g., playground, program-approved transportation, learning setting, bathroom, program-approved excursion, facility

parking lot), **and** involve either 1) a child who participates in a setting that receives Head Start funds **or** 2) a staff, contractor, or volunteer who participates in a setting that receives Head Start funds.

As illustrated in the table below, a reportable incident must meet the “Where” condition in the left column and at least one of the “Who” conditions in the right column.

WHERE		WHO
<p>Any setting where Head Start services are provided.</p> <p>Examples include a learning setting, bathroom, playground, facility parking lot, and program-approved transportation and excursions.</p>	AND	<p>A child that receives services fully or partially funded by a Head Start grant, or a child that participates in a classroom at least partially funded by a Head Start grant.</p>
		OR
		<p>A staff member, contractor, or volunteer that participates in either a Head Start program or classroom at least partially funded by a Head Start grant, regardless of whether the child involved receives Head Start services.</p>

The two examples below further illustrate the kinds of child health and safety incidents that must be reported.

Incident Example 1: An incident occurs on an elementary school playground that is used by a Head Start classroom on site. The incident involved a third-grade teacher using inappropriate discipline with a third-grade student, resulting in the student’s hospitalization. The third-grade teacher involved is not a Head Start volunteer and does not participate in the classroom in any way, nor is the teacher’s position funded by Head Start resources.

Determination: This incident does not require an incident report to OHS. The incident is considered significant, as it required the student to be hospitalized. The incident also met the conditions of the “Where” column, as it occurred in a setting where Head Start services are provided (i.e., the playground used by the Head Start program). However, it did not meet the conditions of the “Who” column, as neither the child nor the teacher involved participated in a program or classroom at least partially funded by a Head Start grant.

Incident Example 2: An incident occurs in a mixed-funded classroom where Head Start services are provided. The incident involved the assistant teacher using inappropriate discipline with a student in the classroom, resulting in the student’s hospitalization. The individual student involved is not funded by a Head Start grant.

Determination: This incident does require an incident report to OHS. The incident is considered significant, as it required the student to be hospitalized. The incident also met the conditions of the “Where” column, as it occurred in a setting where Head Start services are provided (i.e., a mixed-funded Head Start classroom). While the individual child involved is not funded by a Head Start grant, they participate in a classroom at least partially funded by a Head Start grant. Because the child participates in a classroom supported by Head Start resources, that is sufficient to meet the conditions of the “Who” column and would require an incident report to OHS

regardless of the funding source that provides the salary for the adult involved. Furthermore, in this case, the condition of the “Who” column is also met by the adult, as the assistant teacher is a staff member that participates in a classroom at least partially funded by a Head Start grant.

A Note on Mandated Reporting: Both example incidents above may require a mandated report to the state, local, or tribal child protective agency if the inappropriate discipline meets the definitions under the [Federal Child Abuse Prevention and Treatment Act](#). Programs should refer to their state, local, or tribal laws about mandated reporting of child abuse and neglect, including what their definition of abuse is, and use the more stringent definition to determine if a mandated report is warranted. Example 2 requires an incident report to OHS regardless of whether a mandated report is required. Example 1 does not require an incident report to OHS, even if a mandated report is required.

It is important for OHS to receive the appropriate incident reports as the incidents may have broader implications for all children served in the classroom or program. The IM appendix includes a graphic to help clarify the settings and participants that may result in a recipient submitting an incident report.

OHS outlines minimum expectations for reportable incidents that affect the health or safety of a child in 45 CFR §1302.102(d)(1)(iii). These examples are provided to support programs in understanding what OHS considers a “significant incident” that rises to the level of requiring an incident report.

It is not possible to provide an exhaustive list of significant incidents that affect children’s health and safety because OHS cannot predict all incidents that may occur in Head Start settings. However, OHS considers the following types of incidents to require submission of a report. These illustrative examples are designed to provide Head Start grant recipients with an understanding of the types of incidents that require reporting:

- **Any mandated reports regarding agency staff or volunteer compliance with federal, state, tribal, or local laws addressing child abuse and neglect or laws governing sex offenders.** OHS requires an incident report if a program becomes aware of a report of suspected child abuse and neglect to child protective services or law enforcement agencies that identified agency staff or volunteers as a potential perpetrator. Mandated reporting of confirmed or suspected child abuse and neglect in other cases, such as by a parent or caregiver not funded by a Head Start grant in the child’s home, does not need to be reported to OHS.
- **Suspected or known maltreatment or endangerment of a child by staff, consultants, contractors, and volunteers.** Definitions and examples of what OHS considers behaviors that have potential to maltreat or endanger a child are provided under 45 CFR §1302.90(c)(1)(ii).
 - *Corporal punishment or physically abusive behavior* is defined as intentional use of physical force that results in, or has the potential to result in, physical injury. Examples may include, but are not limited to, hitting, kicking, shaking, biting, pushing, restraining, force feeding, or dragging.

- *Sexually abusive behavior* is defined as any completed or attempted sexual act, sexual contact, or exploitation. Examples may include, but are not limited to, behaviors such as inappropriate touching, inappropriate filming, or exposing a child to other sexual activities.
 - *Emotionally harmful or abusive behavior* is defined as behaviors that harm a child's self-worth or emotional well-being. Examples may include, but are not limited to, using seclusion, exposing a child to public or private humiliation, or name calling, shaming, intimidating, or threatening a child.
 - *Neglectful behavior* is defined as the failure to meet a child's basic physical and emotional needs, including access to food, education, medical care, appropriate supervision by an adequate caregiver, and safe physical and emotional environments. Examples may include, but are not limited to, leaving a child unattended on a bus, withholding food as punishment, or refusing to change soiled diapers as punishment.
- **Serious harm or injury of a child resulting from lack of preventative maintenance** of a Head Start facility (e.g., in a classroom, bathroom, on a playground), bus, or other approved program transportation.

Serious injuries require immediate professional medical attention, such as hospitalization, including for example:

- Broken bones
 - Severe sprains
 - Chipped or cracked teeth
 - Head trauma
 - Deep cuts
 - Contusions or lacerations
 - Animal bites
- **Serious harm, injury, or endangerment of a child resulting from lack of supervision** while in the care or under the supervision of program staff. Lack of supervision includes leaving a child alone and unattended anywhere on the grounds of a Head Start facility (e.g., in a classroom, bathroom, on a playground), as well as outside the facility in a parking lot, on a nearby street, or on a bus or another program-approved transportation or excursion while under the care of the Head Start program.

As stated above, serious injuries require immediate professional medical attention. This update to the Performance Standards represents a change from the prior policy of reporting all instances when a child has been unsupervised for any length of time. Instead, the requirement is that programs report any incident in which there has been serious harm, injury, or endangerment resulting from the lack of supervision.

Endangerment involves conduct that puts children at reasonable risk of harm and can be considered similar to [supervisory neglect](#) or failure to supervise. Examples of endangerment can include, but are not limited to:

- Leaving children in situations where they have access to dangerous chemicals or toxins, choking hazards, or life-threatening substances
- Unsupervised or unrestricted exposure to vehicular traffic, extreme temperatures, risk of drowning, or risk of leaving the facility alone
- Leaving children alone with access to unknown or unauthorized adults
- Leaving a child unsupervised such that their basic needs are not met
- Knowingly failing to protect a child from maltreatment perpetrated by another caregiver in the program

When determining whether lack of supervision resulted in endangerment, programs should examine each situation on a case-by-case basis and consider factors such as:

- The child's age and developmental needs
- Length of time the child was left unsupervised
- Inherent dangers of the child's unsupervised environment

This policy requires programs to conduct through assessments of risk based on the potential harm to children. Programs should be able to demonstrate how they made their determination considering all relevant factors including those described above.

- **Unauthorized release of a child** from a Head Start facility, bus, or other approved program transportation to a person without the permission or authorization of a parent or legal guardian and whose identity had not been verified by photo identification.

“Responsible HHS Official” to Whom Programs Submit Incident Reports

For reporting significant incidents regarding the health and safety of children in settings where Head Start services are provided, the responsible HHS official is the program specialist assigned to the grant or any OHS regional leadership official. OHS regional leadership officials include supervisory program specialists, regional program managers, and regional program directors.

This individual or individuals are referred to as “the responsible HHS official” throughout this IM for ease of reference. It may also be necessary for programs to report these occurrences to other local, state, or tribal entities as required by applicable laws, such as child protective services, law enforcement, or child care licensing agencies.

Incident Reporting Timeframe and Compliance

Programs are required to submit all incident reports, as appropriate, to the responsible HHS official immediately, but no later than seven calendar days following the incident (45 CFR §1302.102(d)(1)(ii)). This timeline must be met regardless of investigations by other entities

such as relevant local, state, tribal, or federal law enforcement. The Appendix includes an illustration of the required reporting timeline.

OHS notes that state, local, and tribal reporting requirements to child welfare agencies are not a substitute for reporting to OHS and programs should not wait to learn the outcome of reports to state, local, or tribal entities before reporting to OHS. Generally, these entities are investigating whether a violation of state or local law occurred, whereas OHS's responsibility is to provide oversight with regard to the Head Start Program Performance Standards. However, programs are encouraged to indicate that an investigation or adjudication is underway when they submit an incident report to OHS.

The required reporting timeframe begins when someone in a program — including any program staff, contractors, or volunteers, including those at a delegate agency of a Head Start grant recipient — learns that an incident occurred or learns of an allegation that an incident occurred. To ensure consistency in implementing this requirement, OHS recognizes the day a program (agency, delegate agency, or partner of a Head Start grant recipient) learns of an incident as “Day 0,” with reporting to the responsible HHS official required no later than seven calendar days following the incident. If a program reports an incident to OHS on or after “Day 8,” the program will not be in compliance with this requirement.

To ensure programs report significant incidents regarding the health and safety of children to their assigned program specialist or OHS regional leadership official, OHS reviews publicly available information and reports from the grant period. If OHS discovers that a program failed to report a significant incident for which a report was required within the required timeframe, the program is subject to receiving a monitoring finding, which may include a deficiency determination.

Information Required in Incident Reports

OHS understands that, in some circumstances, a program may not have all the information at the time an incident is reported. Even still, the priority is to inform OHS of what is known in accordance with the reporting timeframe. Programs are encouraged to update the responsible HHS official with additional information as it becomes available. For example, in the case of ongoing investigations or pending adjudication by other authorities such as local, state, tribal, or federal law enforcement, programs should deliver status changes or determinations related to the incident as permitted.

Programs should not provide OHS with information that could interfere with their compliance with other legal requirements pertaining to confidential or sensitive information, such as requirements pertaining protected health information or direct indicators of personally identifiable information of children.

Next Steps

OHS and Head Start programs share the goal of providing a safe environment where children learn and grow. Promoting health and safety and preventing significant incidents in Head Start programs is everyone's responsibility.

We encourage program leadership and staff to complete freely available online training and professional development courses on the Office of Head Start's [Individualized Professional Development \(iPD\) Portfolio](#). Although these courses are not necessarily specific to OHS incident reporting requirements, they support programs in promoting child safety and preventing significant incidents:

- The [iLookOut for Child Abuse: A Mandated Reporter Training for Head Start Staff](#) course focuses on protecting child safety and preventing and identifying child abuse and neglect in accordance with federal requirements for reporting to child protective services or law enforcement agencies. The course is available in English and Spanish.
- [Preventing Injuries in Early Childhood Programs](#) is a two-part course that will help you make your early childhood program a safe place for children to grow, learn, and explore.
- [Active Supervision in Early Childhood Programs](#) is a two-part course that will help you learn and implement the six strategies of active supervision.

OHS is committed to continuous quality improvement and will continue to provide support and guidance in preventing incidents that jeopardize children's health and safety. If you have any questions regarding this IM, please contact your Regional Office.

By working together to prevent, swiftly identify, report, and correct health and safety incidents, we can better support child health and well-being in Head Start programs. Thank you for your work on behalf of children and families.

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

Appendix

Figure 1. Incidents Reporting (The Where and the Who)

Figure 1 illustrates the conditions that determine whether a significant incident that affects the health or safety of a child is required to be reported to OHS.

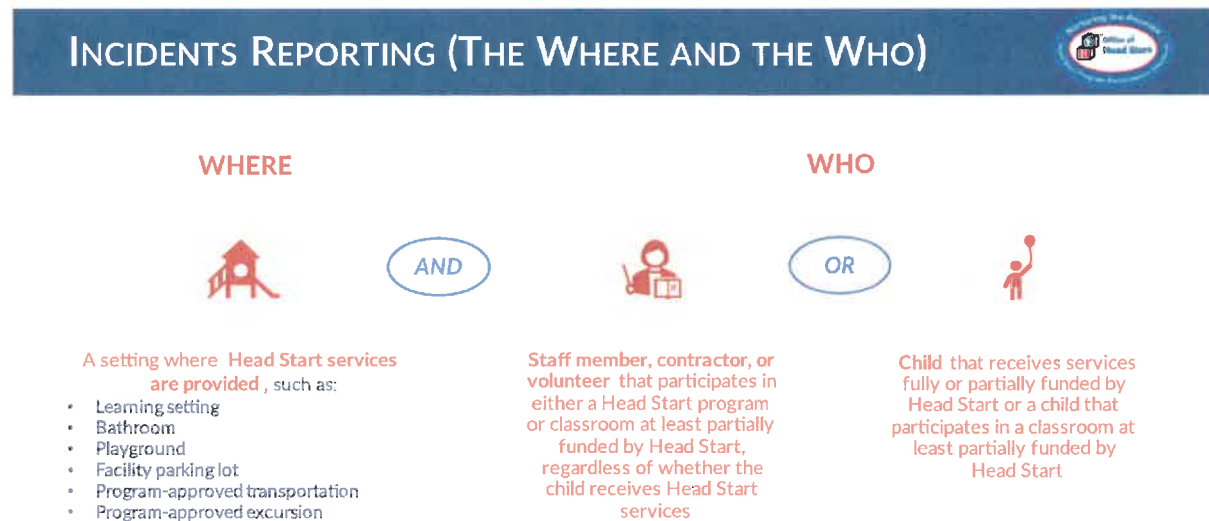


Figure 2. Significant Health and Safety Incidents

Figure 2 illustrates a decision tree that can be used when determining whether an incident requires an incident report to OHS.

SIGNIFICANT HEALTH AND SAFETY INCIDENTS

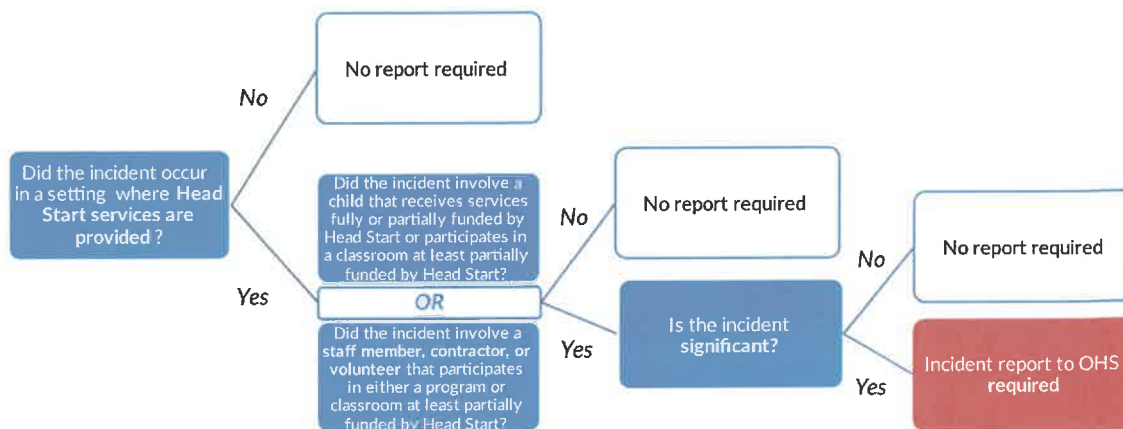


Figure 3. Reporting Timeline Requirements

Figure 3 illustrates the OHS incident reporting timeline requirements. Programs should report incidents to OHS immediately, but no later than seven calendar days following a health or safety incident.

The example illustration shows that the reporting timeline begins on Day 0, or the day of the incident, which is Tuesday the 12th. The last day to report the incident to OHS is on Day 7, which is Tuesday the 19th. On Wednesday the 20th, the report would be considered overdue.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
10	11	12	13	14	15	16
		Day 0 Reporting timeline begins				
17	18	19	20	21	22	23
		Day 7 Last day to report to OHS	Report Overdue			

INFORMATION MEMORANDUM

ACF Administration for Children and Families	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	
	1. Log No: ACF-OCC-CCDF-IM-24-01, ACF-OHS-IM-24-05, ACF-ECD-THV-IM-24-02	2. Issuance Date: 11/01/2024
	3. Originating Office: Office of Child Care, Office of Head Start, Office of Early Childhood Development	
	4. Key Words: Child Care and Development Fund, CCDF, Tribal Lead Agencies, American Indian and Alaska Native Head Start, Region XI, Tribal Home Visiting, Housing, Workforce	

TO: Tribal Child Care and Development Fund (CCDF) lead agencies, American Indian and Alaska Native (AIAN) Head Start award recipients, and Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV) recipients

SUBJECT: Use of Federal Early Childhood Program Funds to Improve Access to Housing-Related Supports for the Early Childhood Workforce in Tribal Communities

REFERENCES: The Child Care and Development Block Grant (CCDBG) Act (42 U.S.C. 9857 *et seq.*), Head Start Act as amended (42 U.S.C. 9801 *et seq.*), Social Security Act, Title V, section 511 (42 U.S.C. 711)

PURPOSE: This Information Memorandum (IM) provides an overview and guidance to Tribal CCDF lead agencies, American Indian and Alaska Native (AIAN) Head Start award recipients, and Tribal MIECHV recipients regarding how CCDF, Head Start, and Tribal MIECHV funds can be used to address challenges recruiting and retaining an effective Tribal early childhood workforce serving Tribal communities where access to affordable housing is limited. This IM does not reflect a change in ACF's interpretation for how CCDF, Head Start, and Tribal MIECHV funds can be used, it clarifies allowable uses of funds to support costs related to increasing the availability of affordable, accessible housing for the early childhood workforce serving Tribal communities.

BACKGROUND: The Administration for Children and Families (ACF) is committed to supporting Tribes in recruiting and retaining an early childhood workforce that meets the needs of children and families in Tribal communities. The Office of Head Start (OHS), Office of Child Care (OCC), and Office of Early Childhood Development (ECD) engages in consultation with Tribal leaders to honor the nation-to-nation relationship and to better understand the unique circumstances and experiences of Tribal early childhood programs. In consultations and other engagements, Tribal leaders and program administrators highlighted ongoing challenges recruiting and retaining a qualified workforce across Head Start, child care, and home visiting programs. Challenges include: recruiting individuals with appropriate qualifications and experience (such as knowledge of or expertise in Native culture and language); providing adequate compensation (including both pay and benefits); competing with pay and benefits offered by other employers and non-Tribal entities; and the high levels of stress experienced by staff due to low wages, insufficient benefits, and working conditions, as well as the challenging nature of providing trauma-informed care to young children.

Many Tribal communities have consistently identified the lack of available, affordable housing for program staff as a significant challenge to recruiting and retaining staff to work in the community. The lack of housing is due to a variety of factors, including excessive rent levels in communities with a high cost of living, insufficient resources for Tribal public housing, and lack of economic and built infrastructure that would facilitate construction of new housing.

ACF has received requests for clarification on whether Tribal early childhood funds can be used to address the lack of available, affordable housing to mitigate this barrier to hiring and retaining program staff. This IM clarifies the flexibilities Tribal Lead Agencies and federal award recipients have in using CCDF, Head Start, and Tribal MIECHV funds to improve access to housing-related supports for early childhood teachers and staff. Each federal early childhood program has unique requirements, and the guidance is only applicable to the program that is being discussed in each section. We recognize that many Tribes have significant housing challenges. This IM addresses specific concerns about housing for early childhood teachers and staff that have been brought to our attention. We acknowledge this will not resolve the complexities of the housing challenges in Tribal communities.

ACF encourages Tribal early childhood programs, within the parameters of federal requirements, to consider the full range of strategies that can be used to address the shortage of early childhood teachers, home visitors, and staff in their communities, including the potential to support housing needs of the early childhood workforce. Promising strategies and additional resources to support the early childhood workforce can be found on [ECD's Workforce Initiative webpage](#).

INFORMATION:

This IM provides information to Tribal communities regarding strategies to identify and improve access to housing-related supports as a recruitment and retention strategy for the early childhood workforce. It offers examples of activities that Tribal communities may implement based on the separate funding source and regulations. Partnering in efforts to increase access to housing in Tribal communities may also be considered in the context of other investments in early care and education facilities, and other efforts to address Tribal housing and facilities issues (such as those supported by the Department of Housing and Urban Development and the Department of Agriculture). This IM encourages Tribal grant recipients to consider how these strategies could align with efforts to use the [Tribal Early Childhood Facilities Combined Application Guide](#), which streamlines administrative requirements and processes for Tribal CCDF and Head Start recipients to braid funds and jointly apply to construct or improve early childhood facilities.

ALLOWABLE ACTIVITIES:

The activities outlined below meet the programmatic purposes and goals of each respective funding source. The following is not a list of required activities, but rather a list of allowable activities that Tribal leaders may consider in addressing the unique circumstances in their communities related to acquiring housing or mitigating excessive housing costs for early childhood teachers and staff (which includes educators in center-based and home-based settings), home visitors, and staff. Investment of program funds to support housing, housing stipends, and all housing related supports for early childhood teachers and staff detailed in this IM must be reasonable, allocable, allowable, and aligned with the goals of the program. This means that investment of program funds would be necessary to meet the goals and objectives of your program and, to be considered reasonable, these costs must not exceed

what a sensible person would pay for housing in any given market condition. Finally, an allocable cost can be directly charged to the grant based on the benefit provided. Additional considerations for reasonableness include:

1. Whether the cost is generally recognized as ordinary and necessary for recipient's operation or proper and efficient performance of the Federal award;
2. Whether the cost is supported by sound business practices, arm-length bargaining, laws and regulations, and terms and conditions of the Federal award;
3. Market prices for comparable costs for the geographic area; and
4. Whether cost represents a deviation from recipient's written policies and procedures for incurring costs.
5. Grant recipient would need to ensure that the revision would not take away from their ability to implement the program at the same level.

In addition to being reasonable, the housing-related support cost must also be necessary for the performance of the Federal award and be allocable. A cost is allocable to a Federal award if it meets any of the following standards:

1. Is incurred specifically for the Federal award;
2. Benefits both the Federal award and other work of the recipient; or
3. Is necessary to the overall operation of the recipient and is assignable in part to the Federal award

Tribes should work with their assigned Program Specialists or Federal Project Officers to determine the allowability of expenditures aligned with this guidance and federal cost principals.

Child Care and Development Fund (CCDF)

OCC administers the CCDF to Tribal governments to provide child care assistance for families with low incomes and improve access to affordable, high-quality child care, including early care and school-age programs. Tribal lead agencies may consider using CCDF funds to provide housing-related supports for the child care workforce if it is clear that such expenditures are related to the ability to implement CCDF activities or contribute to the overall quality of child care. Investment of CCDF funds to support housing for the child care workforce may include the following types of expenditures when reasonable, necessary, allocable, and in alignment with the recipient's written policies. Tribal Lead Agencies should work with their assigned Program Specialist to determine if the expenditure is reasonable, necessary, and allocable.

- **Facility construction or major renovation:** Tribes are exempt from the state and territory CCDF prohibition on use of funds for construction or minor renovation at 42 USC 9858m(c)(6). This allows Tribes to use CCDF "for the construction or renovation of facilities that will be used to carry out such programs."¹ With ACF approval, Tribal CCDF lead agencies can use CCDF to construct or renovate child care facilities. ACF approval is not required for minor renovation. CCDF can also be used to construct or renovate housing or living facilities for child care teachers or staff if the Tribal lead agency demonstrates that (1) adequate housing is not available (such as in a remote area), and (2) housing for child care staff is an integral, but subordinate component of an overall construction or renovation project for a facility whose main purpose is to provide child care services primarily to CCDF-eligible children. In other words, if a Tribal lead agency is

constructing or renovating a child care facility, and teacher or staff housing is not otherwise available, ACF may approve the use of CCDF to construct or renovate staff housing, either connected to the main building or in a separate facility close by, as part of the same construction or renovation project. If a Tribal lead agency needs to construct or renovate housing for child care teachers or staff separate from the construction or renovation of a child care facility (e.g., the Tribe may already have adequate child care facilities), the lead agency may apply for an extraordinary circumstances waiver in accordance with 45 CFR 98.19. ACF will only approve such waivers in narrow circumstances in which a Tribe demonstrates that it has exhausted other federal funds that can be used for housing, and that lack of housing is a central barrier to implementing CCDF. Any construction or major renovation projects to include living quarters for teacher or staff housing require ACF approval.

- **Compensation Strategies:** CCDF requires all lead agencies to set aside funds for activities to improve the quality of child care, defined as “activities ... that are designed to improve the quality of child care services and increase parental options for, and access to, high-quality child care.” (42 USC 9858e(a)(1)) Tribal lead agencies may use CCDF quality dollars to support housing for the child care workforce if the investment is in alignment with the lead agency’s assessment of needs and the investment will directly support higher quality child care options for families. Allowable quality expenditures may include, for example, housing stipends to offset teacher or staff living expenses, or transportation stipends to offset costs for teachers or staff who travel a great distance to work in Tribal communities. Housing stipends are allowable for family child care providers who may need to find housing suitable for caring for children or adapt their home to make it suitable for child care. Tribal lead agencies adopting these strategies should describe these activities in their CCDF Plan. These housing investment strategies for the child care workforce may be used within a compensation package to attract high-quality child care teachers and staff.

Head Start

OHS Region XI administers American Indian and Alaska Native (AIAN) Head Start programs, which provide high-quality, comprehensive early childhood services to young children and their families. Region XI AIAN Head Start programs often integrate Native language and culture into their services, as determined by the recipient. Region XI recipients may use Head Start funds to provide housing-related supports for staff if such expenditures are necessary, reasonable, and allocable to implement Head Start services, and align with the recipient’s written policies. Grant recipients should work with their assigned Program Specialist to determine if the expenditure is reasonable, necessary, and allocable.

- **Compensation strategies:** Head Start funds may be used to support compensation packages that include housing stipends to offset teacher or staff living expenses, or travel stipends to offset costs for teachers or staff who travel a great distance to work in Tribal communities. Programs have flexibility to determine compensation packages for staff, provided that these policies are incorporated into their personnel policies and procedures approved by the governing body and Policy Council or policy committee. Since monetary bonuses likely count as income, recipients should understand income requirements for public benefits to determine how such bonuses may impact staff members’ access to these benefits. At their discretion, programs can decide to require a service commitment as a condition of receiving a bonus or financial incentive. However, any service requirement is solely the responsibility of the recipient to establish, implement, and enforce, as appropriate. All costs must be reasonable, allocable,

and allowable per Uniform Administrative Requirements (45 CFR §§75.430 and 75.445(b)). It is also important to note that these cost principles apply to non-federal match. Grant recipients should work with their assigned Program Specialist to determine if an expenditure is reasonable, necessary, and allocable.

For more information on the cost principles, programs are encouraged to review resources on the Head Start website: [short video titled, Cost Principles That Guide Head Start Grants Management](#); detailed Individualized Professional Development (iPD) course titled, [Financial Essentials Series](#).²

- **Additional services for staff experiencing housing or cost of living challenges:** In [Sec. 636](#) of the Head Start Act, the Head Start purpose is defined, in part, as “the provision to low-income children and their families of health, educational, nutritional, social, and other services that are determined, based on family needs assessments, to be necessary.” As such, programs can offer additional on-site services to staff experiencing housing and/or cost-of-living challenges, if such services are necessary to enable the provision of Head Start services (i.e., the program would otherwise be unable to obtain the staff necessary to provide Head Start services). This may include using Head Start funds to have supports such as laundry, showers, food items, clothing items, and computer or internet access available on-site for staff. Recipients still need to comply with the cost principles in [45 CFR Part 75](#) and any costs incurred need to be necessary and reasonable. Recipients should work with their assigned Program Specialist to determine if costs are reasonable, necessary, and allocable.
- **Facility construction or major renovation:** Head Start grant recipients can, with prior approval, use Head Start funds for facility purchase, construction, or major renovation projects “used to carry out Head Start programs.” (Head Start Act, Section 644(f)(1)). Funds can be used for facilities in which Head Start services are being provided. However, if renovating or constructing living facilities for staff could be demonstrated to be an integral but subordinate part of the Head Start facility, one that was shown to be necessary to carry out Head Start requirements in places with demonstrated lack of housing stock, such as in highly rural or remote areas, it may be justifiable. Additionally, living facilities for staff may be justifiable in instances where local housing costs are exorbitant and prohibit staff from residing in the community, or times when market factors might make it extraordinarily difficult for staff to secure a housing loan. OHS encourages Head Start directors to partner with the Tribal housing authority or other comparable entities to support and oversee housing management and maintenance, ensuring that the complex operational task of managing residential housing is led by those with the most expertise in this area. Head Start funds are prohibited for the sole purpose of constructing teacher, home visitor, or staff housing. As with all construction or major renovation projects, ACF approval is required.

Tribal Maternal, Infant, and Early Childhood Home Visiting (MIECHV)

ECD administers the Tribal MIECHV program, which issues awards to Tribes, Tribal organizations, and urban Indian organizations to develop and implement home visiting programs in AI/AN communities. Recipients have some flexibility in leveraging MIECHV funds to provide housing-related supports for home visitors and staff as long as it is reasonable, necessary, and allocable to carry out the Tribal MIECHV program as well as aligns with the recipient’s written policies.

- **Compensation Strategies:** Tribal MIECHV funds may be used to support compensation packages that include housing stipends to offset home visitor or staff living expenses, or travel stipends to offset costs for home visitors or staff who travel a great distance to work in Tribal communities. Recipients may use MIECHV funds for compensation packages, provided all costs are reasonable, allocable and allowable per Uniform Administrative Requirements (45 CFR §§75.430 and 75.445(b)). Compensation packages could include housing stipends if recipients present justification for the expense, particularly to recruit and retain high-quality staff. Recipients must provide a narrative within the budget/budget amendment should they make a request for a housing allowance as part of a benefits package justifying it as a reasonable expense in the context of the program, particularly if they struggle to hire or retain staff without this benefit. MIECHV programs have flexibility to include housing stipends in compensation packages for staff and should document this in their personnel policies and procedures. ACF is also available to discuss other compensation mechanism options (e.g., increased wages, cost of living increases, recruitment costs, relocation costs) to offset the cost of living.

Tribal MIECHV funds may not be used for facility construction, purchase, and major renovation. The Department of Health and Human Services Grants Policy Statement (HHS GPS) states that construction is allowable only when program legislation specifically authorizes new construction, modernization, or other activities, and then the HHS Operating Division (OPDIV) specifically authorizes the costs in the Notice of Award. The MIECHV legislation (Section 511 of Title V of the Social Security Act) does not specifically authorize use of funds for this purpose and the Notice of Funding Opportunity for the Tribal MIECHV program specifically lists facility purchase, construction, or major renovation as unallowable costs. Tribal MIECHV funds are therefore prohibited for facility construction of staff housing, and any construction would need to be through a separate construction federal award.

Community Partnerships

Early childhood programs can also consider strategies to strengthen existing partnerships and build new ones to increase access to supports and services for staff housing. This can mean leveraging state, Tribal, local, and private initiatives as partners to meet community needs more effectively. Community partners that programs can work with include, but are not limited to:

- [Head Start Collaboration Offices \(HSCOs\)](#)
- [State McKinney-Vento coordinators](#)
- Local continuums of care
- [Public housing authorities](#) and [Section 8 Housing Choice Vouchers](#)
- Tribal housing authorities
- [Low Income Home Energy Assistance Program \(LIHEAP\)](#)
- [Community action](#), faith-based, culture-sensitive, and other nonprofit organizations

Programs can start by reviewing general information about help with rent and housing on the [Consumer Financial Protection Bureau website](#). They can also reach out to their local [Public Housing Agency](#), or [Tribal housing authority](#), to determine whether staff could be eligible for a housing voucher or other resources. Developing and maintaining partnerships with housing agencies and liaisons is one of the best ways to stay up to date on programs, policies, and resources that might be available for staff. This means programs can help staff quickly connect with meaningful resources for which they may be eligible, including rental assistance.

Tribal Early Childhood Facilities Combined Application Guide

ECD, OCC, and OHS recently announced a [Tribal Early Childhood Facilities Combined Application Guide](#). This guide aims to streamline application submission and review process for Tribal CCDF and Tribal Head Start programs that jointly apply to construct, renovate, or improve early childhood facilities. These applications may include facility construction to include staff housing that aligns with allowable activities noted in this IM.

Additional Resources to Support the Tribal Early Childhood Teachers, Home Visitors, and Staff

ACF published [guidance](#) for [CCDF administrators](#) and [Head Start programs](#) that strongly encourages leaders to invest in strategies to recruit and retain a strong, diverse early childhood workforce, including increasing staff compensation, strengthening early childhood professional development and career pathways, and continuing to be bold in strategies that align with their community needs and demonstrate the value of their work.

Questions

Please direct inquiries to the appropriate office:

- Contact the Regional Program Manager in the appropriate OCC Regional Office. Contact information for OCC regions can be found at <https://www.acf.hhs.gov/occ/resource/regional-child-care-program-managers>.
- Contact the OHS Region XI Program Office with any questions.
- Contact your Tribal MIECHV Federal Project Officer with any questions.

/Katie Hamm/

Katie Hamm
Deputy Assistant Secretary
Early Childhood Development

/Ruth Friedman/

Ruth Friedman
Director
Office of Child Care

/Khari M. Garvin/

Khari M. Garvin
Director
Office of Head Start

Head Start Program Performance Standard Reference 1302 Program Operations	Head Start Act	Performance Standard	Action Plan	Policy / Procedure	Responsibility	Form
1302.1 – Overview	<p>641A - 1) CONTENT OF STANDARDS- The Secretary shall modify, as necessary, program performance standards by regulation applicable to Head Start agencies and programs under this subchapter,</p> <p>645 - The Secretary shall by regulation prescribe eligibility for the participation of persons in Head Start programs assisted under this subchapter</p> <p>648 - Staff Qualifications and Development</p>	<p>This part implements these statutory requirements in Sections 641A, 645, 645A, and 648A of the Act by describing all of the program performance standards that are required to operate Head Start, Early Head Start, American Indian and Alaska Native and Migrant or Seasonal Head Start programs. The part covers the full range of operations from enrolling eligible children and providing program services to those children and their families, to managing programs to ensure staff are qualified and supported to effectively provide services. This part also focuses on using data through ongoing program improvement to ensure high-quality service. As required in the Act, these provisions do not narrow the scope or quality of services covered in previous regulations. Instead, these regulations raise the quality</p>				

		standard to reflect science and best practices, and streamline and simplify requirements so programs can better understand what is required for quality services.					
Subpart B – Program Structure							
1302.20 Determining Program Structure		(a) <u>Choose a program option</u>					
		(1) A program must choose to operate one or more of the following program options: center-based, home-based, family child care, or an approved locally-designed variation as described in 1302.24. The program option(s) chosen must meet the needs of children and families based on the community assessment described on 1302.11(b). A Head Start Preschool program may not provide only the option described in 1302.22(a) and (c)(2)	Mercer County Head Start (MCHS) utilizes the community needs assessment and updates to determine the program option(s) most appropriate to meet the needs of eligible children and families. MCHS will only offer home-based services if center-based services are also an option for families and children.	Community Needs Assessment	Executive Director	Community Needs Assessment	
		(2) To choose a program option and develop a program calendar, a program must consider in	MCHS utilizes the community needs assessment to determine what program	Community Needs Assessment	Director	Community Needs Assessment	

		<p>conjunction with the annual review of the community assessment described in 1302.11(b) (2), whether it would better meet child and family needs through conversion of existing slots to full day or full working day slots, extending the program year, conversion of existing Head Start Preschool slots as described in paragraph (c) of this section, and ways to promote continuity of care and services. A program must work to identify alternate sources to support full working day services. If no additional funding is available, program resources may be used.</p>	<p>options will best serve eligible children and families in the community.</p> <p>Areas to be considered: length of service day (part day vs full day), length of program year (part year / school year / full year)</p> <p>For full-day service days, considered full-day “working” days, Head Start should not be the only funding source. MCHS will research additional / alternate resources for funding in the community.</p>		Board of Education Policy Council	MOUs with Community members
		<p>(b) Comprehensive Services – All program options must deliver the full range of services, as described in subparts C,D,E,F, and G of this part, except that through 1302.32 and 1302.34 do not apply to home-based options.</p>	<p>MCHS delivers Education, Child Development, Health, Family & Community Engagement, Disabilities, and Transition services.</p>		Board of Education Policy Council Director Managers	Head Start Service Plans
<p>(5)(A) Upon written request and pursuant to the requirements of this paragraph, a Head Start agency may use funds that</p>	<p>(c) Conversion</p> <p>1. Consistent with section 645(a) (5) of the Head Start Act, grant recipients may request to convert Head Start Preschool slots to Early</p>	<p>MCHS will utilize the community needs assessment to determine if the program needs to serve children & families prenatal through 3 years old.</p>	Grant Submission		Board of Education Policy Council Director	Amendment to Grant Application - HSES

	<p>were awarded under this subchapter to serve children age 3 to compulsory school age, in order to serve infants and toddlers if the agency submits an application to the Secretary containing, as specified in rules issued by the Secretary, all of the following information:</p> <p>(i) The amount of such funds that are proposed to be used in accordance with section 645A (b).</p> <p>(ii) A communitywide strategic planning and needs assessment demonstrating how the use of such funds would best meet the needs of the community.</p>	<p>Head Start slots through the re-funding application process or as a separate grant amendment.</p>	<p>This assessment must target eligible pregnant mothers and children ages birth through 3 years old. Additionally, this assessment must address if there are other comparable services in the area.</p> <p>Policy Council will participate in the assessment process and assist with the determination of the programmatic option change.</p> <p>MCHS will submit an amendment to the current approved grant to the Office of Head Start.</p> <p>The request for conversion must be comprehensive ensuring training, start up, and on-going costs are accounted for.</p>			
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	<p>(iii) A description of how the needs of pregnant women, and of infants and toddlers, will be addressed in accordance with section 645A (b), and with regulations prescribed by the Secretary pursuant to section 641A in areas including the agency's approach to child development and provision of health services, approach to family and community partnerships, and approach to program design and management.</p> <p>(iv) A description of how the needs of eligible children will be met in the community.</p> <p>(v) Assurances that the agency will</p>						
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	participate in technical assistance activities (including planning, start-up site visits, and national training activities) in the same manner as recipients of grants under section 645A.				
	(vi) Evidence that the agency meets the same eligibility criteria as recipients of grants under section 645A.				
	(B) An application that satisfies the requirements specified in subparagraph (A) shall be approved by the Secretary unless the Secretary finds that--				
	(i) the agency lacks adequate capacity and capability to				

	carry out an effective Early Head Start program; or					
	(ii) the information provided under subparagraph (A) is inadequate.					
	(C) In approving such applications, the Secretary shall take into account the costs of serving persons under section 645A.					
	(D) Any Head Start agency with an application approved under subparagraph (B) shall be considered to be an Early Head Start agency and shall be subject to the same rules, regulations, and conditions as apply to recipients of grants under section 645A, with respect to activities					

	carried out under this paragraph.						
		(2) Any grant recipient proposing a conversion of Head Start preschool services to Early Head Start services must obtain policy council and governing board approval and submit the request to their regional office.	MCHS will obtain Policy Council and Board of Education approval prior to submission of the amendment to the Grant application.	Grant Submission	Director	PC minutes Board minutes	
b) SCOPE AND DESIGN OF PROGRAMS.--In carrying out a program described in subsection (a), an entity receiving assistance under this section shall-- (1) provide, either directly or through referral, early, continuous, intensive, and comprehensive child development and family support services that will enhance the physical, social,		(3) With the exception of American Indian and Alaska Native grant recipients as described in paragraph ©(4) of this section, the request to the regional office must include: (i) A grant application budget and budget narrative that clearly identifies the funding amount for the Head Start Preschool and Early Head Start programs before and after the proposed conversion; (ii) The results of the community assessment demonstrating how the proposed use of funds would best meet the needs of the community, including a description of how the needs of eligible Head Start children will	The grant amendment request will include: grant application budget, budget narrative (demonstrating the fiscal amount difference before conversion in comparison to after the possible conversion) The community needs assessment will demonstrate the need for the conversion, how funds would support the needs identified, and how the conversion meets the needs of the families eligible.	Grant Submission	Director	Grant Amendment Policy Council recommendations Board of Education meeting minutes	

<p>emotional, and intellectual development of participating children;</p> <p>(2) ensure that the level of services provided to families responds to their needs and circumstances;</p> <p>(3) promote positive parent-child interactions;</p> <p>(4) provide services to parents to support their role as parents (including parenting skills training and training in basic child development) and services to help the families move toward self-sufficiency (including educational and employment services, as appropriate);</p>	<p>be met in the community when the conversion takes place; (iii). A revised program schedule that describes the program option(s) and the number if funded enrollment slots for Head Start Preschool and Early Head Start programs before and after the proposed conversion; (iv). A description of how the needs of pregnant women, infants, and toddlers will be addressed;</p> <p>(v). A discussion of the agency's capacity to carry out an effective Early Head Start program in accordance with the requirements of section 645A(b) of the Head Start Act and all applicable regulations;</p> <p>(vi). Assurances that the agency will participate in training and technical assistance activities required of all Early Head Start grant recipients;</p> <p>(vii). A discussion of the qualifications and competencies of the child development staff proposed for the Early Head Start program, as well as a description of the facilities and program infrastructure that will be used to support the new or expanded Early Head Start program;</p>	<p>Program schedule updates</p> <p>Summative proposal of how needs for pregnant, women, infant, and toddlers will be supported. Examples include: program option, family engagement services, education services, disability services, and transition services.</p> <p>A Training & Technical Assistance Plan will demonstrate all requirements dictated by Early Head Start.</p>			
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<p>(5) coordinate services with services provided by programs in the State (including home-based services) and programs in the community (including programs for infants and toddlers with disabilities and programs for homeless infants and toddlers) to ensure a comprehensive array of services (such as health and mental health services and family support services);</p> <p>(6) ensure that children with documented behavioral problems, including problems involving behavior related to prior or existing trauma, receive</p>	<p>(viii). A discussion of any one-time funding necessary to implement the proposed conversion and how the agency intends to secure such funding' and,</p> <p>(ix). The proposed time table for implementing this conversion, including updating school readiness goals as described in subpart J of this part.</p>	<p>Child Development Staff will have all requirements established by Early Head Start.</p> <p>MCCHS will ensure that an infrastructure is in place to secure all requirements of the Early Head Start are fully supported and implemented.</p> <p>Startup funds and implementation plans must be considered and communicated to the Program Specialist per recommendations by the grantee, Policy Council, and Board of Education.</p>		
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	appropriate screening and referral;					
	(7) ensure formal linkages with local Head Start programs in order to provide for continuity of services for children and families;					
	(8) develop and implement a systematic procedure for transitioning children and parents from an Early Head Start program to a Head Start program or other local early childhood education and development program;					
	(9) establish channels of communication between staff of					

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	<p>the Early Head Start program, and staff of a Head Start program or other local providers of early childhood education and development programs, to facilitate the coordination of programs;</p> <p>(10) in the case of a Head Start agency that operates a program and that also provides Head Start services through the age of mandatory school attendance, ensure that children and families participating in the program receive such services through such age;</p> <p>(11) ensure formal linkages with providers of early intervention services for infants</p>					
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	and toddlers with disabilities under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.), with the State interagency coordinating council, as established in part C of the Individuals with Disabilities Education Act (20 U.S.C. 1431 et seq.), and with the agency responsible for administering section 106 of the Child Abuse Prevention and Treatment Act (42 U.S.C. 5106a); and					
	(12) meet such other requirements concerning design and operation of the program described in subsection (a) as the Secretary may establish.					

	<p>(3) Notwithstanding any other provision of this Act, an Indian tribe or tribes that operates both an Early Head Start program under section 645A and a Head Start program may, at its discretion, at any time during the grant period involved, reallocate funds between the Early Head Start program and the Head Start program in order to address fluctuations in client populations, including pregnant women and children from birth to compulsory school age. The reallocation of such funds between programs by an Indian tribe or tribes during a year shall not serve as</p>	<p>(4) Consistent with section 645(d)(3) of the Act, any American Indian and Alaska Native grant recipient that operates both an Early Head Start program and a Head Start preschool program may reallocate funds between the programs at its discretion and at any time during the grant period involved, in order to address fluctuations in client populations. An American Indian and Alaska Native program that exercises this discretion must notify the regional office.</p>	<p>MCHS does not operate and American Indian / Alaska Native program.</p>		
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	the basis for the Secretary to reduce a base grant (as defined in section 640(a) (7)) for either program in succeeding years.						
		d) Source of funding. A program may consider hours of service that meet the Head Start Program Performance Standards, regardless of the source of funding, as hours planned class operations for the purposes of meeting the Head Start preschool and Early Head Start service duration requirements.	Program design allocates / affords to ensure that classroom operations meet the service duration requirements.	Program Schedule	Director School District Treasurer	Grant application / program schedule	
1302.21 Center-based option		(a) Setting. The center-based option delivers the full range of services, consistent with 1302.20(b). Education and child development services are delivered primarily in classroom settings. (b) Ratios and group size. (1) Staff-child ratios and group size maximums must be determined by the age of the majority of children in a class at the start of the year and may adjust this determination during the program year, if	MCHS operates center-based programming for eligible children.		Board of Education Policy Council Director	Program Schedule	
		(b) Ratios and group size. (1) Staff-child ratios and group size maximums must be determined by the age of the majority of children in a class at the start of the year and may adjust this determination during the program year, if	MCHS recognizes and follows the child-teacher ratios identified by the OHS and Ohio Department of Education / Department of Children and Youth	Active Supervision	Early Childhood Services Director	ODE Licensing regulations	

		<p>necessary. Where state and local licensing requirements are more stringent than the teacher-child ratios and group size specifications in this section, a program must meet the stricter requirements. A program must maintain appropriate ratios during all hours of program operations except:</p> <p>(i) For brief absences of a teaching staff member for no more than 5 minutes; and,</p> <p>(ii) During nap time, one teaching staff member may be replaced by one staff member or trained volunteer who does not meet the teaching qualifications for the age.</p>	<p>ODE / DCY ratios are currently established at a minimum of 12 children to 1 teacher.</p> <p>Step Up to Quality guidance references that high-quality programs exercise a lower teacher / child ratio (1 to 12).</p>			
		<p>(2) An Early Head Start or Migrant or Seasonal Head Start class that serves children under 36 months old must have 2 teachers with no more than eight children, or 3 teachers with no more than 9 children. Each teacher must be assigned consistent, primary responsibility for no more than four children to promote continuity of care for individual children. A program must minimize teacher changes throughout a child's</p>	<p>MCHS does not currently operate an EHS program.</p>			

		enrollment, whenever possible, and consider mixed age group classes to support continuity of care.					
		(3) A class that serves a majority of children who are 3 years old must have no more than 17 children with a teacher and a teaching assistant or two teachers. A double session class that serves a majority of children who are 3 years old must have no more 15 children with a teacher and teaching assistant or two teachers.	In a full day program, where the population is predominantly 3 year old children, the classroom size will not exceed 17 children with 2 teachers (1 Head Teacher, 1 Teacher Assistant) In a part day program, where the population is predominantly 3 year old children, the classroom size will not exceed 15 children with 2 teachers(1 Head Teacher, 1 Teacher Assistant)	Program Schedule	Early Childhood Services Director	Attendance Record	
		(4) In a full day program, where the population is predominantly 3 year old children, the classroom size will not exceed 17 children with 2 teachers (1 Head Teacher, 1 Teacher Assistant) In a part day program, where the population is predominantly 3 year old children, the classroom size will not exceed 15 children with 2 teachers(1 Head Teacher, 1 Teacher Assistant)	In a full day program, where the population is predominantly 4 or 5 year old children, the classroom size will not exceed 20 children with 2 teachers (1 Head Teacher, 1 Teacher Assistant) In a part day program, where the population is predominantly 4 or 5 year old children, the classroom size will not exceed 17 children with 2 teachers (1 Head Teacher, 1 Teacher Assistant)	Program Schedule	Early Childhood Services Director	Attendance Record	

		(c) Service Duration				
		<p>1. Early Head Start</p> <p>(i). A program must provide 1,380 annual hours of planned class operations for all enrolled children.</p> <p>(ii). A program that is designed to meet the needs of young parents enrolled in school settings may meet the service duration requirements in paragraph ©(1)(i) of this section if it operates a center-based program schedule during the school year aligned with its local education agency requirements and provides regular home-based services during the summer break.</p>	MCHS does not currently operate EHS services.			
		<p>2) Head Start Preschool</p> <p>(i). Service duration for at least 45 percent. A program must provide 1,020 annual hours of planned class operations over the course of at least eight months per year for at least 45 percent of its Head Start preschool center-based funded enrollment.</p> <p>(ii). Service duration for remaining slots. A program must provide, at a minimum, at least 160 days per year of planned</p>	<p>MCHS provides 3.5 hours of service per day, 4 days per week, 136 days per year, for part day programming.</p> <p>MCHS provides 7.5 hours of service per day, 4 days per week, 136 days per year for full day programming.</p>	Program Schedule	Board of Education Policy Council Director	Program Schedule

		<p>class operations if it operates for five days a week, or at least 128 days per year of it operates 4 days per week. Classes must operate a minimum of 3.5 hours per day.</p> <p>(iii). Double session. Double session variation must provide classes for four days per week for a minimum of 128 days per year and 3.5 hours per day. Each double session class staff member must be provided adequate break time during the course of the day. In addition, teachers, assistants, and volunteers must have appropriate time to prepare for each session together, to set up the classroom environment, and to give individual attention to children entering and leaving the center.</p> <p>(iv). A Head Start preschool program providing fewer than 1,020 annual hours of planned class operations or fewer than eight months of service is considered to meet the requirements described in paragraphs (c)(2) of this section if its program schedule aligns with the annual hours required by its local education agency for grade one and such alignment is</p>	<p>The agency program planning calendar and the individual teacher contracts established through the Local OAPSE #457, teaching staff is afforded break time each day, planning time, and time to greet and dismiss children and families each day at the center.</p> <p>MCHS will provide full day services (1,020 hours) to at a minimum 50% of the total funded enrollment.</p>	<p>Early Childhood Services Director Education Staff</p>	<p>Program Planning Calendar OAPSE Local #457 Negotiated Agreement Classroom Daily Routine</p>	<p>Program Planning Calendar Program Schedule</p>
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		necessary to support partnerships for service delivery.		Community Needs Assessment	Board of Education Policy Council Director	
		3). Exemption for Migrant or Seasonal Head Start programs. A Migrant or Seasonal program is not subject to the requirements described in paragraph ©(1) or (2) of this section, but must make every effort to provide as many days and hours of service as possible to each child and family.	NA			
		4). Calendar planning. A program must: (i) Plan its year using a reasonable estimate of the number of days during a year that classes may be closed due to problems such as inclement weather; and, (ii) Make every effort to schedule makeup days using existing resources if hours of planned class operations fall below the number required per year.	<p>MCHS plans 136 days of service.</p> <p>In the event of closures due to inclement weather, MCHS will utilize the make-up days when reasonable and feasible within the parameters of the negotiated agreement and program planning calendar.</p> <p>In the event that cancellation days exceeds the extra 5 days pre-planned and all make-up days scheduled by MCHS, the program MAY opt to extend the school year beyond its pre-planned end date to ensure all service days are delivered if the budget permits.</p>	Program Schedule	Director	Program Calendar

		(d) Licensing and square footage requirements. (1) The facilities used by a program must meet state, tribal, or local licensing requirements, even if exempted by the licensing entity. When state, tribal, or local requirements vary from Head Start requirements, the most stringent provision takes precedence.	MCHS follows ODE / DCY licensing requirements for square footage per child.	ODE / DCY Preschool Licensing	Early Childhood Services Director	ODE / DCY Preschool Licensing
		(2) A center-based program must have at least 35 square feet of usable indoor space per child available for the care and use of children (exclusive of bathrooms, halls, kitchen, staff rooms, and storage places) and at least 75 square feet of usable outdoor play space per child.	MCHS classroom space exceeds the minimum licensing requirement of 35 square feet per child. MCHS exceeds the minimum requirement of 75 square feet of usable outdoor play space per child.	ODE / DCY Preschool Licensing	Early Childhood Services Director	ODE / DCY Preschool Licensing
		(3) A program that operates two or more groups within an area must ensure clearly defined, safe divisions to separate groups. A program must ensure such spaces are learning environments that facilitate the implementation of the requirements in subpart C of this part. The divisions must limit noise transfer from one group to another to prevent disruption of	Not applicable under current facility arrangements.			

		an effective learning environment.				
1302.22 Home-based option		<p>(a) Setting. The home-based option delivers the full range of services, consistent with 1302.20(b), through visits with the child's parents, primarily in the child's home and through group socialization opportunities in a Head Start classroom, community facility, home, or on field trips. For Early Head Start programs, the home-based option may be used to deliver services to some or all of a program's enrolled children. For Head Start Preschool programs, the home-based option may only be used to deliver services to a portion of a program's enrolled children.</p>	<p>MCHS Home-based services ensure that all comprehensive services are provided to each enrolled child and family.</p> <p>While the home visitor will make every effort to provide services to the child in their home, MCHS does respect a family's right to request an alternative location for home visits as long as this is not conducted on a frequent / regular basis.</p> <p>Group Socializations are to be scheduled and conducted primarily in the center-based facility.</p> <p>Group socializations are to be no less than 2 hours in length and no more than 3.5 hours in length to ensure that the children experience a typical preschool day experience.</p> <p>Group Socializations may be scheduled / conducted off site in the event of a field trip.</p>	Early Childhood Services Director Home Visitor	Program Schedule Program Options	
		<p>(b). Caseload. A program that implements a home-based option must maintain an average caseload of 10 to 12</p>	<p>A home visitor may be assigned no more than 12 enrolled families.</p>	Early Childhood Services Director	Program Schedule	

		families per home visitor with a maximum of 12 families for any individual home visitor.				
		<p>(C) Service Duration.</p> <p>1. Early Head Start. By August 1, 2017, an Early Head Start home-based program must:</p> <p>(i). Provide 1 home visit per week per family that lasts at least 1 ½ hours and provide a minimum of 46 visits per year; and,</p> <p>(ii). Provide, at a minimum, 22 group socializations activities distributed over the course of the program year.</p>	MCHS does not operate an Early Head Start program.			
		(2) Head Start Preschool. A Head Start Preschool home-based program must:				
		<p>(i). Provide one home visit per week per family that lasts at least an hour and a half and provide a minimum of 32 home visits per year; and,</p> <p>(ii). Provide, at a minimum, 16 group socializations activities distributed over the course of the program year.</p>	<p>The program planning calendar ensures that there is the opportunity to provide 32 home visits throughout the program year.</p> <p>Home visits are not conducted when center-based programming is NOT in session.</p>	Home Visitor Early Childhood Services Director	Program Calendar	

			<p>The program planning calendar ensures that there is the opportunity to provide 16 group socializations throughout the program year.</p> <p>Group Socializations are scheduled on Fridays, when center-based classrooms are available.</p>			
	<p>(3) Meeting Minimum requirements. A program that implements a home-based option must:</p> <p>(i) Make up planned home visits or scheduled group socialization activities that were canceled by the program, and to the extent possible attempt to make up planned home visits canceled by the family, when this is necessary to meet the minimums described in paragraphs ©(1) and (2) of this section; and,</p> <p>(ii) Not replace home visits or scheduled group socialization activities for medical or social service appointments for the purposes of meeting the minimum requirements described in paragraphs ©(1) and (2) of this section.</p>	<p>Any cancelled home visits or group socializations by the program will be made up with the pre-planned program calendar.</p> <p>The home visitor will utilize due diligence to ensure any and all home visits cancelled by the family will be rescheduled and completed. The home visitor will document all efforts in the child's files. The home visitor will conference with the Mental Health Manager in regards to attendance issues with a family.</p> <p>Medical and social service appointments CANNOT be utilized to be counted in attendance for home visits or socializations.</p>	Home Visitor	Program Option – Home Base		

			(d) Safety requirements. The areas for learning, playing, sleeping, toileting, preparing food, and eating in facilities used for group socializations in the home-based option must meet the safety standards described in 1302.47(1) (ii) through (viii).	Group socializations are conducted in the center-based classrooms within the Head Start facility with the exception of field trip experiences.		Home Visitor	Program option – Home-Based	
1302.23 Family Child Care Option			(a) Setting. The family child care program option delivers the full range of services, consistent with 1302.20(b). Education and child development services are primarily delivered by a family child care provider in their home or other family-like setting. A program may choose to offer the family child care option if: (1) The program has a legally binding agreement with one or more family child care provider(s) that clearly defines the roles, rights, and responsibilities of each party, or the program is the employer of the family child care provider, and ensures children and families enrolled in this option receive the full range of services described in subparts C,D,E,F, and G of this part; and,	MCHS does not currently operate any family child care options.				

		(2) The program ensures family child care homes are available that can accommodate children and families with disabilities.					
		<p>(b) Ratios & Group size.</p> <p>(1) Group size. A program that operates the family child care option per Head Start children are enrolled must ensure group size does not exceed the limits specified in this section. If the family child care provider's own children under the age of 6 are present, they must be included in the group size.</p>					
		<p>(2) Mixed age with preschoolers. When there is one family child care provider, with a mixed-age group of children that includes children over 36 months of age, the maximum group size is six children and no more than two of the six may be under 24 months of age. When there are two providers, the maximum group size is twelve children with no more than four of the twelve children under 24 months of age.</p>					

					(3). Infants and Toddlers only. Where there is one family child care provider with a group of children that are all under 36 months of age, the maximum group size is four children, and no more than two of the four children may be under 18 months of age.				
					4). Maintaining ratios. A program must maintain appropriate ratios during all hours of program operation. A program must make substitute staff available with the necessary training and experience to ensure quality services to children are not interrupted.				
					(c) Service Duration. Whether family child care option services are provided directly or via contractual arrangement, a program must ensure family child care providers operate sufficient hours to meet the child care needs of families and not less than 1,380 hours per year.				
					(d) Licensing requirements. A family child-care provider must be licensed by the state, tribal, or local entity to provide				

						services in their home or family-like setting. When state, tribal, or local requirements vary from Head Start requirements, the most stringent provision applies.			
						(e) Child development specialist. A program that offers the family child care option must provide a child development specialist to support child care providers and ensure the provision of quality services at each family child care home. Child development specialists must:			
						<ol style="list-style-type: none"> 1. Conduct regular visits to each home, some of which are unannounced, not less than once every two weeks; 2. Periodically verify compliance with either contract requirements or agency policy; 3. Facilitate ongoing communication between program staff, family child care providers, and enrolled families; and, 4. Provide recommendations for technical assistance and support the family child care provider in developing relationships with other child care professionals. 			

[illegible]

		request is submitted through a grant application for an upcoming project period, for the project period of the new award. Such approval may be revoked based on progress toward program goals as described in 1302.102 and monitoring as described in 1304.2.					
		(c). Waiver requirements. 1. The responsible HHS official may waive one or more of the requirements contained in 1302.21(b),(c)(1)(i) and (c)(2)(iii) and (iv); 1302.22(a) through (c); and 1302.23(b) and (c), but may not waive ratios or group size for children under 24 months. Center-based locally-designed options must meet the minimums described in section 640(k) (1) of the Act for center-based programs.					
		(2). If the responsible HHS official determines a waiver of group size for center-based services would better meet the needs of children and families in a community, the group size may not exceed the limits below:					
		(i). A group that serves children 24 to 36 months of age must	MCHS currently does not operate a program with				

		have no more than ten children; and,	children ages 24 – 36 months of age.			
		(ii). CCS Head Start currently does not operate a program with children ages 24 – 36 months of age.	MCHS currently enrolls no more than 20 children in a full-day program option.			
		(iii). A group that serves predominantly four-year old children must have no more than twenty-four children.				
		(3). If the responsible HHS official approves a waiver to allow a program to operate below the minimums described in 1302.21© (2) (i), a program must meet the requirements described in 1302.21© (2) (i), or in the case of a double session variation, a program must meet the requirements described in 1302.21© (2) (iii).				
		(4) In order to receive a waiver under this section, a program must provide supporting evidence that demonstrates the locally-designed variation effectively supports appropriate development and progress in children's early learning outcomes.				
		(5) In order to receive a waiver of service duration, a program				

				<p>must meet the requirement in paragraph © (4) of this section, provide supporting evidence that it better meets the needs of parents than the applicable service duration minimums described in 1302.21(c)(1) and (c)(2)(i), 1302.22(c) or 1302.23(c), and assess the effectiveness of the variation in supporting appropriate development and progress in children's early learning outcomes.</p>		
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Mercer County Head Start Policies and Procedures

P/P Topic:	Program Schedule	P/P #:	
Part:	Program Operations	PC Approval Date:	11/14/24
Subpart:	<i>B – Program Structure</i>	Last Reviewed Date:	11/13/23
Section Title(s):	<i>Determining program structure</i>	Implementation Responsibility:	Executive Director
Related Performance Standard(s):	1302.20(a) 1302.21(b) 1302.22	Monitoring Responsibility:	Policy Council

(A) Policy	<p>(a) <i>Choose a program option.</i></p> <p>(1) A <u>program</u> must choose to operate one or more of the following program options: center-based, home-based, family child care, or an approved locally-designed variation as described in §1302.24. The program option(s) chosen must meet the needs of children and families based on the community assessment described in §1302.11(b). A Head Start Preschool program may not provide only the option described in §1302.22(a) and (c)(2).</p> <p>(2) To choose a program option and develop a program calendar, a program must consider in conjunction with the annual review of the community assessment described in §1302.11(b)(2), whether it would better meet child and family needs through conversion of existing slots to full school day or full working day slots, extending the program year, conversion of existing <u>Head Start Preschool</u> slots to <u>Early Head Start</u> slots as described in paragraph (c) of this section, and ways to promote continuity of care and services. A program must work to identify alternate sources to support full working day services. If no additional funding is available, program resources may be used.</p> <p>(b) <i>Ratios and group size.</i></p> <p>(1) Staff-child ratios and group size maximums must be determined by the age of the majority of children and the needs of children present. A program must determine the age of the majority of children in a class at the start of the year and may adjust this determination during the program year, if necessary. Where state or local licensing requirements are more stringent than the teacher-child ratios and group size specifications in this section, a program must meet the stricter requirements. A program must maintain appropriate ratios during all hours of program operation,</p> <p>2) <u>Head Start Preschool.</u></p>
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(B) Responsibility	Director
	<p>(i) Service duration for at least 45 percent. A program must provide 1,020 annual hours of planned class operations over the course of at least eight months per year for at least 45 percent of its Head Start Preschool center-based funded enrollment.</p> <p>(ii) Service duration for remaining slots. A program must provide, at a minimum, at least 160 days per year of planned class operations if it operates for five days per week, or at least 128 days per year if it operates four days per week. Classes must operate for a minimum of 3.5 hours per day.</p> <p>(iii) Double session. Double session variation must provide classes for four days per week for a minimum of 128 days per year and 3.5 hours per day. Each double session class staff member must be provided adequate break time during the course of the day. In addition, teachers, assistants, and volunteers must have appropriate time to prepare for each session together, to set up the classroom environment, and to give individual attention to children entering and leaving the center.</p> <p>(iv) Special provision for alignment with local education agency. A Head Start Preschool program providing fewer than 1,020 annual hours of planned class operations or fewer than eight months of service is considered to meet the requirements described in paragraphs (c)(2)(i) of this section if its program schedule aligns with the annual hours required by its local education agency for grade one and such alignment is necessary to support partnerships for service delivery.</p> <p>4) <i>Calendar planning.</i> A program must:</p> <p>(i) Plan its year using a reasonable estimate of the number of days during a year that classes may be closed due to problems such as inclement weather; and,</p> <p>(ii) Make every effort to schedule makeup days using existing resources if hours of planned class operations fall below the number required per year.</p>

(C) Procedure	<p>The Director, in conjunction with the administrative team and approved by Policy Council, develops the program schedule for the program year and program project period.</p> <p>To determine which program options best meet the needs of the children and families of Mercer County, the Director consults the community needs assessment.</p> <p>When and if the center-based option is chosen, the Director in consultation with the administrative team determines the number of students / classrooms to be designated as full-day school year programming, and part – day / part year programming. Similarly, the amount of children in classrooms is determined by following HSPPS 1302.21(b). This includes any information garnered at the time of enrollment for IEP needs, behavioral needs, and medical needs. Staffing arrangements and classroom ratios may differ classroom to classroom.</p> <p>Classroom ratios are set at 1 teacher per 10 students. This standard meets the requirements of OHS and is more stringent than ODE / DCY and the state quality rating system (SUTQ).</p> <p>Classroom service days are scheduled on a calendar within the framework of the Celina City School district operating calendar. MCHS plans for 136 service days. 7.5 hours of service for full-day programming and 3.5 hours per day for part-day programming.</p> <p>Make up days are scheduled on the immediate Friday following the missed scheduled service day when reasonable and feasible. The Director reserves the right to extend the school year to ensure that children receive the minimum required hours of service when the budget allows.</p> <p>Home-based options provide all the same services as center-based. When extenuating circumstances present themselves (i.e. natural disasters, local / state / national emergencies, long-term vacancies in the program, severe disruptive behaviors) leadership must determine if home-based services ensure the continuity of services for families in need. These decisions are made on a case by case basis. When home-based preschool programming is not an approved program option within the approved 5 year project period / continuation grant, local leadership may opt to provide this deliver option on a short-term basis by qualified staff.</p>
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