

Head Start Monthly Report October 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 \$1,088.74

9/13/24	\$87.43	Subway	PC Lunch
9/20/24	\$114.82*	Wal Mart	Sunshine Fund
9/23/24	\$30.00*	Cakes By Design	Sunshine Fund
9/24/24	40.00	American Airlines	A Esser
9/24/24	19.17	Uber	A Esser
9/24/24	17.79	UVC	A Esser
9/26/24	20.70	Uber	A Esser
9/26/24	9.91	UVC	A Esser
9/27/24	672.52	Hilton	A Esser
9/27/24	28.40	PP Coach	A Esser
9/30/24	48.00	Dayton International	A Esser

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 , COLT, Kids Summit

Internal committees / meetings – Policy Council meetings, Administrative meetings, Recruitment, Intake meetings accepting children, Pre-Service training meetings, OHSAI mtgs, State Collab Director mtg, monthly OHS call, Momentum discussion about MH Consultative Services, meetings with all programmatic managers, Intakes, Conscious Discipline training planning meetings,

Trainings provided – CA / N all staff & contractors

In addition to the tasks mentioned, Director attended the NHSA Fall Leadership Institute. Topics in the institute included the new HSPPS. Director visited the congressional offices of Jordan, Latta, Beatty and Senate offices of Brown & Vance. Advocacy for continued support of Head Start and the need to increase funding to meet the mandates in the HSPPS were top priority.

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

Report on Recruitment – Rockford center is full with 1 person on the waiting list. Celina center full-day programming is full. Part-day programming is not full. Coldwater center is grossly underenrolled. New recruitment efforts in the Coldwater area include banners at the school and billboards in the community educating the community that Head Start is in their community and who is eligible.

Report on Community Partnerships – The program has active MOUs with each school district, EI, HMG, ESC, DJFS, Momentum, Key to Recovery, Our Home, Topp Counseling

Education – TLC coaching began

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

Disabilities – new SLP, Sarah Sudhoff

Health – many children enrolled with PÓAs

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

Family Engagement – Policy Council nominations and elections held

B. Enrollment / Attendance

Enrollment by program option – 110 overall

**Attendance by program option – Rockford won the attendance award for September
89.72% attendance overall**

Enrollment by Program Option:

Half Day PY Head Start	19
Full Day School Year (6 hour day)	91

Attendance by Program Option:

09-25 09-24	05436844269400114785480	WM SUPERCENTER #1433 CELINA OH		242.17
			Total Purchasing Activity	\$283.10
ANY ESSER				
5563-7580-0004-9768				
			CREDITS	
			\$0.00	
			PURCHASES	
			\$1,088.74	
			CASH ADV	
			\$0.00	
			TOTAL ACTIVITY	\$1,088.74
ACCOUNTING CODE:				
Purchasing Activity				
Post Tran	Reference Number	Transaction Description	Amount	
Date Date				
09-13 09-12	57540244256718306967311	EZCATER'SUBWAY 800481803 MA P.O.S.: UUY983 SALES TAX: 0.00	87.43	
09-20 09-19	05436844264400091584091	WM SUPERCENTER #1433 CELINA OH	114.82	
09-23 09-20	55506294264094932103845	CAKES BY DESIGN CELINA OH	30.00	
			Total Purchasing Activity	\$232.25

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Continued on next page

INDIVIDUAL CARDHOLDER ACTIVITY				
Travel Activity				
Post Tran	Reference Number	Transaction Description	Amount	
Date Date				
09-24 09-23	55417344268672681918322	AMERICAN 0010288811259 PHOENIX AZ ESSER/AMV DEPART: 09-23-24 P.O.S.: SALES TAX: \$0.00 DAY AA G DCA	40.00	
09-24 09-23	5542950426743722088125	UBER *TRIP 8005928996 CA P.O.S.: KSGESTYX SALES TAX: 0.00	19.17	
09-24 09-23	55432864267201820437120	SO *UVC INC WASHINGTON DC P.O.S.: 00023058430208640 SALES TAX: 1.06	17.79	
09-26 09-25	55429504269715990587542	UBER *TRIP 8005928996 CA P.O.S.: RM166256 SALES TAX: 0.00	20.70	
09-26 09-25	55432864269202469439318	SG *UVC INC WASHINGTON DC P.O.S.: 00023058430206736 SALES TAX: 0.59	8.91	
09-27 09-26	55436874271172718447720	HILTON CAPITAL WASHINGTON DC ARRIVAL: 09-23-24 2139784	672.52	
09-27 09-26	55500384271101354240431	PP*COACH TRANSPORTATIO WASHINGTON DC	28.40	
09-30 09-28	22303794271005089298266	99938 - DAYTON INTERNA VANDALIA OH P.O.S.: P64008858 SALES TAX: 1.44	48.00	
			Total Travel Activity	\$856.49
CONNIE ROSE				
5563-7580-1236-5418				
			CREDITS	
			\$0.00	
			PURCHASES	
			\$5,592.88	
			CASH ADV	
			\$0.00	
			TOTAL ACTIVITY	\$5,592.88
ACCOUNTING CODE:				

HEAD START - 2024 GRANT

	DEC	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
	REVENUE												
Federal Revenue		102,385.62	145,745.66	137,394.97	109,193.81	114,757.32	274,698.30		165,868.11	155,993.36			1,206,043.06
CACFP Revenue		8,381.81	10,730.18	12,865.90	11,679.42	20,109.11							63,586.42
Other Local													
Refund prior year exp													
Board advance													
Total	-	110,767.43	156,475.74	150,260.87	120,873.23	134,866.43	274,698.30	-	165,868.11	155,993.36	-	-	1,269,609.47

	EXPENDITURES												
Salary	77,711.90	79,361.81	78,015.20	52,055.53	70,670.80	74,218.73	89,212.64	84,169.22	82,758.79	77,443.66			765,617.28
Fringe Benefits	16,510.23	66,389.87	49,386.89	34,935.97	46,548.17	46,047.62	44,933.59	64,725.76	46,167.43	45,605.71			460,041.34
Programming	868.01	3,769.31	6,048.25	10,428.25	3,760.41	13,870.10	4,624.78	8,030.73	10,046.62	9,129.62			70,596.29
Supplies	5,073.48	1,398.56	9,303.93	17,401.94	4,298.83	8,977.79	7,096.53	2,612.50	12,895.94	38,242.08			107,293.49
Capital Outlay													
Other Expenditures	2,000.00			1,178.00		1,000.00				1,180.00			5,359.00
PAC2 subdental	101,965.62	151,549.65	142,734.27	116,000.69	124,278.21	144,114.24	145,867.55	159,537.21	151,858.68	171,601.27			
Training & Technical Services (job code 400)													
Staff out of town travel (OBU 419)		725.00	1,882.30	4,673.00	1,520.00	2,825.00		2,076.90	1,014.00	290.00			14,986.20
Staff out of town travel (OBU 439)		1,852.72	2,724.80	1,186.02	508.67	2,616.21	598.83	3,049.58	2,893.60				15,420.43
Subdental Purch Service		2,577.72	4,607.10	5,859.02	2,028.67	5,441.21	598.83	5,126.48	3,897.60	250.00			30,386.63
Training & Technical Supplies	420.00		773.78		129.86				243.08	550.00			2,116.72
Training & Tech Supplies	420.00				129.86					550.00			2,116.72
Subdental Supplies													
T&TA-PA20	420.00	2,577.72	5,380.88	5,859.02	2,159.53	5,441.21	598.83	5,126.48	4,140.68	800.00			
Return of Board Advance													1,442,010.74
TOTALS	102,385.62	154,127.37	148,115.15	121,859.71	126,436.74	149,555.45	146,466.38	164,663.69	155,899.36	172,401.27	-	-	1,442,010.74

1,378,444.32
8 million of advance

172,401.27

CATEGORY	RATE	HOURS	AMOUNT	COMMENTS
PC BOARD	48.88	3.5	171.08	
AT-HOME ACTIVITIES	0	0	0	Not in session
PARENT VOLS COMMUNITY VOLS	0	0	0	Not in session
			744.35	
TOTAL				
DONATED GOODS UTILITIES			2142	
ECE MHC			8154	
TOTAL			11,211.43	
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			7769.76	
BENEFITS			433.71	
TOTAL			22904.66	
MO TOTAL			34,116.09	
YTD TOTAL			291,400.06	

Head Start Program Performance Standard Reference 1302 Program Operations	Head Start Act	Performance Standard	Action Plan	Policy / Procedure	Responsibility	Form
1302.1 – Overview	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, 645 - The Secretary shall by regulation prescribe eligibility for the participation of persons in Head Start programs assisted under this subchapter 648 - Staff Qualifications and Development	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 Preschool, 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, the				

		provisions in this part do not narrow the scope or quality of services covered in previous regulations. Instead, the regulations in this part raise the quality standard to reflect science and best practices, and streamline and simplify requirements so programs can better understand what is required for quality services.				
Subpart A – Eligibility, Recruitment, Selection, Enrollment, and Attendance			.			
1302.10 Purpose –		This subpart describes requirements of grant recipients for determining community strengths, needs, and resources as well as recruitment areas. It contains requirements and procedures for the eligibility determination, recruitment, selection, enrollment, and attendance of children and explains the policy concerning the charging of fees				

1302.11 Determining community strengths, needs, and resources		(a) Service area – (1) a program must propose a service area in the grant application and define the area by county or sub-county area, such as a municipality, town, or census tract or jurisdiction of a federally recognized Indian reservation.	Mercer County Head Start has determined that the service area is Mercer County. However, MCHS may choose to expand the service area based upon a community needs assessment and to ensure Head Start services are available in the neighboring geographic areas.		Board of Education Policy Council Director	SF 424
		(i.) A tribal program may propose a service area that includes areas where members of Indian tribes or those eligible for such membership reside, including but not limited to Indian reservation land, areas designated as near-reservation by the Bureau of Indian Affairs (BIA) provided that the service area is approved by the tribe's governing council, Alaska Native Villages, Alaska Native Regional Corporations with land-based authorities, Oklahoma Tribal Statistical Areas, and Tribal Designated Statistical Areas where federally recognized Indian tribes do not have a	MCHS does not operate in or near area described in the standard.			

		<p>federally established reservation.</p> <p>(ii.) If the tribe's service area includes any area specific in paragraph (a) (1) (i) of this section, and that area is also served by another program, the tribe may serve children from families who are not members of the tribe, but who reside within the tribe's established service area.</p>				
		<p>(2) If a program decides to change the service area after ACF has approved its grant application, the program must submit to ACF a new service area proposal for approval.</p>	<p>MCHS assigns and indicates the service area through application / amendment in the Head Start Enterprise System.</p>		<p>Board of Education Policy Council Director</p>	
	<p>42 U.S.C 11432 (6)(A) - Local educational agency liaison</p> <p>(A) Duties Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(i)(ii), shall ensure that—</p>	<p>(b) <u>Community wide strategic planning and needs assessment</u> (community assessment).</p> <p>(1) A program must conduct a community assessment at least once over the five-year grant period and annually review and update if any significant changes are needed as described in</p>	<p>MCHS completes a comprehensive community needs assessment at a minimum once during the 5-year grant cycle, and updates the community needs assessment annually.</p> <p>MCHS will ensure that all items required by the standards will be included in</p>	<p>Community Needs Assessment</p>	<p>Executive Director</p>	

<p>(i) homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies;</p> <p>(ii) homeless children and youths enroll in, and have a full and equal opportunity to succeed in, schools of that local educational agency;</p> <p>(iii) homeless families, children, and youths receive educational services for which such families, children, and youths are eligible, including Head Start and Even Start programs and preschool programs administered by the local educational</p>	<p>paragraph (b)(5) of this section to:</p> <p>(i) Identify populations most in need of services including prevalent social or economic factors, challenges, and barriers experienced by families and children;</p> <p>(ii) Inform the program's design and to ensure equitable, inclusive, and accessible service delivery that reflect needs and diversity of the community;</p> <p>(iii) Inform the enrollment, recruitment, and selection process to prioritize the enrollment of those populations with relevant circumstances identified under paragraph (b)(1)(i) of this section;</p> <p>(iv) Identify strengths and resources in the community that can be leveraged for service delivery, coordination, and partnership efforts for education, health, nutrition, and referrals to social services to eligible</p>	<p>the community needs assessment.</p>			
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	<p>agency, and referrals to health care services, dental services, mental health services, and other appropriate services;</p> <p>(iv) the parents or guardians of homeless children and youths are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children;</p> <p>(v) public notice of the educational rights of homeless children and youths is disseminated where such children and youths receive services under this chapter, such as</p>	<p>children and families; and,</p> <p>v) Identify the communication methods and modalities available to the program that best engage with prospective and enrolled families in accessible ways.</p> <p>(2). In conducting The community assessment, a program must collect and utilize data that describes community strengths, needs, and resources and include, at a minimum:</p> <p>(i) Relevant demographic data about eligible infants, toddlers, preschool age children, and expectant mothers, including their geographic location, race, ethnicity, and languages they speak, including:</p> <p>(A) Race and ethnicity;</p> <p>(B) Children living in poverty;</p> <p>(C) Children experiencing homelessness in collaboration with, to the extent possible, McKinney-Vento Local Education Agency Liaisons (42 U.S.C. 11432 (6)(A));</p> <p>(D) Children in foster care;</p>				
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	<p>schools, family shelters, and soup kitchens;</p> <p>(vi) enrollment disputes are mediated in accordance with paragraph (3)(E); and</p> <p>(vii) the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin, as described in paragraph (1)(j)(iii), and is assisted in accessing transportation to the school that is selected under paragraph (3)(A).</p>	<p>(E) Children with disabilities, including types of disabilities and relevant services and resources provided to these children by community agencies;</p> <p>(F) Geographic location and languages they speak;</p> <p>(ii). The education, health, nutrition, and social service needs of eligible children and their families, including prevalent social or economic factors, challenges, and barriers to program participation such as transportation needs;</p> <p>(iii). Typical work, school, and training schedules of parents with eligible children;</p> <p>(iv). Other child development, child care centers, and family child care programs that serve eligible children, including home visiting, publicly funded State and local preschools, and the approximate number of eligible children served and their ages;</p> <p>(v). Resources that are available in the community to address the needs of</p>			
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		<p>eligible children and their families; and,</p> <p>(vi). Strengths of the community; and,</p> <p>(vii) Gaps in community resources in areas relevant to addressing the needs of eligible children and their families such as gaps in health and human services, housing assistance, food assistance, employment assistance, early childhood development, and social services.</p>				
		<p>(3) Programs should have a strategic approach:</p> <p>i) To determine what data to acquire to reach goals in paragraph (b)(1) of this section prior to conducting the community assessment; and (ii) For how to use the data acquired to reach goals in paragraph (b)(1) of this section after conducting the community assessment.</p>				
		<p>(4) When determining what data to acquire under paragraph (b)(2) of this section programs should</p>				

		consider what information is most relevant to inform services for families most in need. Data gathering should be informed by the program's understanding of the community and be intentionally designed to help the program identify community strengths, needs and resources, and plan the program accordingly. Programs are not required to collect all information themselves; rather programs should utilize community partners and utilize existing available data sources relevant to the local community.			
	(5) A program must annually review and, where needed, update the community assessment to identify any significant shifts in community demographics, needs, and resources that may impact program design and service delivery. As described in paragraph (b)(4) of this section, programs should consider results from their self-assessment as required in subpart J of this part (§§	MCHS updates the community needs assessment each year annually ensuring the availability of pre-kindergarten programs and to the extent those programs are meeting the needs of enrolled families and children, an update on homelessness, and significant changes in demographics.	Community Needs Assessment	Executive Director	

		1302.101 through 1302.103) and their annual funding application to inform this process. The annual update review must consider at a minimum: changes related to children and families experiencing homelessness; how the program addresses equity, accessibility, and inclusiveness in its provision of services; and changes including to the availability of publicly-funded pre-kindergarten and whether it meets the needs of the families. Programs must consider how the annual review and update can inform and support management approaches for continuous quality improvement, program goals, and ongoing oversight.				
	(6) A program must consider whether the characteristics of the community allow it to include children from diverse economic backgrounds that would be supported by other funding sources, including private	MCHS provides services to its total funded enrollment amount based upon eligibility criteria. MCHS MAY choose to serve children from diverse economic backgrounds	Community Needs Assessment	Executive Director		

		pay, in addition to the program's eligible funded enrollment. A program must not enroll children from diverse economic backgrounds if it would result in a program serving less than its eligible funded enrollment.	above and beyond its total funded enrollment amount.			
1302.12 Determining, verifying, and documenting eligibility		(a) Process overview (1) Program staff must: (i) Conduct an in-person interview with each family, unless paragraph (a)(2) of this section applies; (ii) Verify information as required in paragraphs (h) and (i) of this section; and, (iii). Create an eligibility determination record for enrolled participants according to paragraph (k) of this section	MCHS family engagement personnel will complete an application with each family interested in participating in the program. Family Engagement personnel consist of the Mental Health Manager and Family Advocates. All applications are to be completed in person either at the center location or at a location mutually agreed upon by staff and parents. In the case of extraordinary circumstances (i.e. state of emergencies) applications can be conducted via the use of technology. Applications are found within the program's online database system, COPA.	Application Process	Family Advocates MH Mgr	COPA – Application Income Verification Form Residency Document Immunization Record Child's birth record HIPAA statement Eligibility criteria

			An application consists of the demographic information of the family, income reflective of 12 months, family's residency status, proof of child's date of birth, child's immunization record, social security numbers for family members, HIPAA statement. The eligibility determination record is created within the COPA system, populating the eligibility criteria based upon the applicant's responses.			
		(2) Program staff may interview the family over the telephone if an in-person interview is not possible or convenient for the family.	Please see above. MCHS expects that applications are to be completed in person unless there is a significant safety concern / natural / national disaster announced.			
		(3) If a program has an alternate method to reasonable determine eligibility based on its community assessment, geographic and administrative data, or from	Please see above.			

	other reliable sources, it may petition the responsible HHS official to waive requirements in paragraphs (a)(1)(i) and (ii) of this section.			
	<p>(b) Age Requirements</p> <p>(1) For Early Head Start, except when the child is transitioning to Head Start Preschool, a child must be an infant or a toddler younger than 3 years old.</p> <p>(2) For Head Start Preschool, a child must:</p> <p>(i) Be at least 3 years old or, turn three years old by the date used to determine eligibility for public school in the community in which the Head Start Preschool program is located; and,</p> <p>(ii) Be no older than the age required to attend school.</p>	<p>MCHS does not operate an Early Head Start program.</p> <p>MCHS utilizes the child's birth certificate, hospital birth record, or medical card issued by the Department of Job & Family Services to verify a child's birth date & determine a child's age. Applications will be completed on children ages 3 to 5 years old with the following stipulations: A child must be 3 by the residing school district's kindergarten age eligible cutoff date. Celina City Schools is August 1st. Applications can be completed on children who are not yet 3 years old no earlier than 30 days prior to the child's 3rd birth date.</p>	Verifying Eligibility - Age	<p>MH Mgr Family Advocates</p> <p>COPA – Application Child's Birth Record / Birth Certificate / Medical Card</p>

		(3) For Migrant or Seasonal Head Start, a child must be younger than compulsory school age by the date used to determine public school eligibility for the community in which the program is located.	Applications cannot be completed on children who will turn 6 years old during the planned program year. MCHS does not operate a Migrant / Seasonal Head Start program.		
	c. Eligibility Requirements 1. A pregnant woman or a child is eligible if: i. The family's income is equal to or below the poverty line; or ii. The family is eligible for or, in the absence of childcare, would be potentially eligible for public assistance; including TANF child-only payment, etc.	MCHS determines eligibility during the application process. Applicants are required to bring their income information reflecting a 12-month period of time. Applicants are required to communicate whether they receive TANF benefits through Department of Job & Family Services. Applicants communicate their housing / homeless status utilizing the McKinney Vento definition on the program's residency document. Applicants are required to share if the child is currently	Verifying Eligibility - Income	MH Mgr Family Advocates	COPA – Application Income Verification form Residency Document Eligibility Criteria

		<p>iii. The child is homeless, as defined in part 1305; or,</p> <p>iv. The child is in foster care.</p> <p>2. If the family does not meet a criterion under paragraph @(1) of this section, a program may enroll a child who would benefit from services, provided that these participants only make up to 10 percent of a program's enrollment in accordance with paragraph (d) of this section.</p>	<p>in a placement outside the home that meets the definition of foster care.</p> <p>MCHS MAY enroll up to 10% of the current enrollment for families deemed to be over-income. These families must display a need through eligibility criteria.</p>			
	<p>(d) Additional allowances for programs</p> <p>(1) A program may enroll an additional 35% of participants whose families do not meet a criterion described in paragraph (C) of this section and whose incomes are below 130 percent of the poverty line, if the program:</p> <p>(i) Establishes and implements outreach, and enrollment policies and</p>	<p>MCHS MAY enroll up to 35% of total enrollment of families deemed over income falling into the 101 – 130% of federal poverty guidelines.</p> <p>MCHS develops a recruitment plan annually that targets the most at-risk and “neediest of the needy” population in the community. Recruitment strategies are shared with all</p>	<p>Verifying Eligibility - Income Recruitment</p>	<p>MH Manager Executive Director Policy Council Board of Education</p>	<p>COPA – Enrollment roster COPA – Wait list Eligibility criteria Recruitment Plan</p>	

		<p>procedures to ensure its meeting the needs of eligible pregnant women, children, and children who do not meet the criteria in paragraph (C) of this section; and</p> <p>(ii) Establishes criteria that ensure pregnant women and children eligible under the criteria listed in paragraph (C) of this section are served first.</p>	<p>MCHS staff, community social service agencies, Policy Council, and the Board of Education.</p> <p>MCHS eligibility and selection criteria is designed to ensure that families most at-risk and “neediest of the needy” are selected first prior to any “over income” applicants.</p> <p>All children identified as categorically eligible or fall at or below 100% of the poverty line are accepted first.</p> <p>Remaining slots are filled in the order of highest points of the eligibility criteria with the highest overincome and lowest eligibility points being accepted last.</p>			
		<p>(2). If a program chooses to enroll participants who do</p>	<p>MCHS program will make available the required information via the program’s recruitment plan</p>			

		<p>not meet a criterion in paragraph (C) of this section, and whose family incomes are between 100 and 130 percent of the poverty line, it must be able to report to the Head Start regional program office:</p> <p>(i) How it is meeting the needs of low-income families or families potentially eligible for public assistance, homeless children, and children in foster care, and include local demographic data on these populations;</p> <p>(ii) Outreach and enrollment policies and procedures that ensure it is meeting the needs of eligible children or pregnant women, before serving over-income children or pregnant women;</p> <p>(iii). Efforts, including outreach, to be fully enrolled with eligible pregnant women or children;</p> <p>(iv). Policies, procedures, and selection criteria it uses to serve eligible children;</p>	<p>and submit to the regional office per request.</p>			
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		(v). Its current enrollment and its enrollment for the previous year (vi). The number of pregnant women and children served, disaggregated by the eligibility criteria in paragraphs @ and (d)(1) of this section; and, (vii). The eligibility criteria category of each child on the program's wait list.			
		(e). Additional allowances for Indian Tribes 1. Notwithstanding paragraph (c) of this section, a Tribal program may determine any pregnant women or children in the approved service area to be eligible for services regardless of income, if they meet the requirements of paragraph (b) of this section. 2. An Indian Tribe or Tribes that operates both an Early Head Start program and a Head Start Preschool	MCHS does not operate an Indian Tribal program.		

		<p>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 Preschool 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 may not serve as a basis for any reduction of the base grant for either program in succeeding years.</p>				
		<p>(f) Migrant or Seasonal eligibility requirements. Notwithstanding paragraph (c) of this section, pregnant women and children are eligible for Migrant or Seasonal Head Start, if they have at least one family member whose income comes primarily from agricultural employment as defined in section 3 of the Migrant and Seasonal</p>	<p>MCHS does not operate a Migrant or seasonal Head Start program.</p>			

		<p>Agricultural Worker Protection Act (29 U.S.C. 1802), and if they meet the requirements of paragraph (b) of this section.</p>			
	<p>(g) Eligibility requirements for communities with 1,000 or fewer individuals. (1) A program may establish its own criteria for eligibility provided that it meets the criteria outlined in section 645(a) (2) of the ACT. (2) No child residing in such community whose family is eligible under criteria described in paragraphs © through (f) of this section, may be denied an opportunity to participate in the program under the eligibility criteria established under this paragraph (g).</p>	<p>MCHS operates within a community of over 1,000 individuals.</p>			
	<p>(h) Verifying age. Program staff must verify a child's age according to program policies and procedures. A programs' policies and procedures cannot require families to provide documents that</p>	<p>A child's age is verified utilizing a host of documents: Official birth certificate Hospital Birth record Medical Card issued through Department of Job & Family Services</p>	<p>Verifying eligibility - Age</p>	<p>MH Manager Family Advocates</p>	<p>Birth certificate Birth Record Medical Card Release of Information Child File</p>

		confirm a child's age, if by doing so creates a barrier for the family to enroll the child.	If families are unable to produce any aforementioned documents, Family Engagement staff may request a release of information signed by the parent / guardian to obtain the necessary information from a source named by the parent / guardian		
	<p>(i). Verifying Eligibility To verify eligibility based on income, program staff must use tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period.</p> <p>i) The program must calculate total gross income using applicable sources of income.</p> <p>ii) A program may make an adjustment to a family's gross income calculation for the purposes of determining eligibility to account for excessive housing costs. A program may use available bills, bank statements, and other relevant documentation provided by the family to calculate total annual</p>	<p>MCHS requires families to provide a variety of options to prove the family's income. These include tax forms, paystubs, written statement from an employer, child support, social security benefits, self-employment statements, no income statements.</p> <p>Income statements must incorporate a 12-month block of time, either the 12 months immediately preceding the application date or the 12 months reflective in the most recent tax year.</p>	Verifying eligibility - Income	MH Manager Family Advocates Executive Director	Income Verification

		<p>housing costs with appropriate multipliers to:</p> <p>(A) Determine if a family spends more than 30 percent of their total gross income on housing costs, as defined in part 1305 of this chapter; and</p> <p>(B) If applicable, reduce the total gross income by the amount spent on housing costs that exceed more than 30 percent.</p> <p>(iii). If the family cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, program staff may accept written statements from employers, including individuals who are self-employed, for the relevant time period and use information provided to calculate total annual income with appropriate multipliers.</p> <p>/.If the family reports no income for the relevant time period, a program may accept the family's signed declaration to that effect, if program staff describes efforts made to verify the family's income, and</p>	<p>MCHS staff will conduct a thorough interview with families to determine all sources of income from the family to determine eligibility. MCHS staff will document all information on the income verification document.</p> <p>While determining eligibility, staff is to document any significant changes in the family's income – current situation income verification should clearly state what the change in income is, the cause for it, how it impacts the family's standard of living. Staff will then utilize a formula to determine if the family would be income eligible for a 12-month</p>		
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		<p>explains how the family's total income was calculated or seeks information from third parties about the family's eligibility, if the family gives written consent. If a family gives consent to contact third parties, program staff must adhere to program safety and privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k)(2) of this section.</p> <p>v.If the family can demonstrate a significant change in income for the relevant time period, program staff may consider current income circumstances.</p>	<p>period of time under the current circumstance.</p>			
		<p>(2) To verify whether a family is eligible for, or in the absence of child care, would be potentially eligible for public assistance, the program must have documentation from either the state, local, or tribal public assistance agency that shows the family receives public assistance or</p>	<p>While interviewing families and determining income, MCHS staff will ask families if they are currently receiving TANF / Public Assistance for childcare. If the family indicates that "yes" they are receiving assistance, MCHS will ask the family to complete a release of information to obtain</p>	<p>Verifying eligibility – Income</p>	<p>MH Manager Family Advocates</p>	<p>Income verification Release of Information</p>

		that shows the family is potentially eligible to receive public assistance	verification of TANF/Public Assistance.			
		(3) To verify whether a family is homeless, a program may accept a written statement from a homeless services provider, school personnel, or other service agency attesting that the child is homeless or any other documentation that indicates homelessness, including documentation from a public or private agency, a declaration, information gathered on enrollment, or application forms, or notes from an interview with staff to establish the child is homeless; or any other document that establishes homelessness. (i). If a family can provide one of the documents described in this paragraph (i) (3), program staff must describe efforts made to verify the accuracy of the information provided and state whether the family is eligible because they are homeless.	During the application interview, MCHS staff has the family read, review and complete the Residency Document. The Residency Document outlines and explains homeless under the <i>McKinney Vento</i> definition.	Verifying eligibility - income	MH Manager Family Advocates	Residency Document Release of Information

		<p>(ii). If a family cannot provide one of the documents described in this paragraph (i)(#) to prove the child is homeless, a program may accept the family's signed declaration to that effect, if, in a written statement, program staff describe the child's living situation that meets the definition of homeless in part 1305 of this chapter.</p> <p>(iii). Program staff may seek information from third parties who have firsthand knowledge about a family's living situation, if the family gives written consent. If the family gives consent to contact third parties, program staff must adhere to program privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k) of this section.</p>			
	<p>(4) To verify whether a child is in foster care, program staff must accept either a court order or other legal or government-issued document, a written</p>	<p>During the application interview, MCHS will determine whether a child is in foster care, or in an out of home placement by court order.</p>	<p>Verifying Eligibility - Income</p>	<p>Family Advocate Mental Health Manager</p>	<p>Release of Information Legal Documentation Court Orders</p>

		statement from a government child welfare official that demonstrates the child is in foster care, or proof of a foster care payment	MCHS will ask for a release of information for the Child Protective Services Agency who has jurisdiction of the child to determine / verify the child's out of home placement. MCHS will accept legal documentation from the applicant at the time of application if available.			
	(j) Eligibility duration (1) If a child is determined eligible under this section and is participating in a Head Start program, he or she will remain eligible through the end of the succeeding program year except that the Head Start program may choose not to enroll a child when there is a change in the child's family income and there is a child with a greater need for Head Start services.	Children who are deemed eligible for the program (not including children identified as over-income) are eligible for 2 years. Children who are identified as over-income may be reconsidered year to year, ensuring that any and all eligible children are served in the program. Annually, any child identified as over-income MAY have their income re-verified for possible eligibility.	Verifying Eligibility - Income & Age	Family Advocate Mental Health Manager Executive Director	Income verification COPA	
645 – Head Start or Early Head Start	2. Children who are enrolled in a program receiving	Once a child is deemed eligible and enrolled in the	Verifying Eligibility - Age & Income	MH Manager	COPA	

		funds under the authority of section 645A of the ACT remain eligible while they participate in the program.	program remain eligible for their duration.			
		(3). If a child moves from an Early Head Start program to a Head Start Preschool program, program staff must verify the family's eligibility again.	Any child transitioning from an Early Head Start program will be re-verified for eligibility.	Verifying Eligibility - Age & Income	Family Advocate MH Manager	Application packet Income Verification
		4. If a program operates both an Early Head Start and a Head Start Preschool program, and the parents wish to enroll their child who has been enrolled in the program's Early Head Start, the program must ensure, whenever possible, the child receives Head Start Preschool services until enrolled in school, provided the child is eligible.	MCHS does not operate an Early Head Start program. MCHS will ensure that on the program's eligibility criteria, weight / points will be given to children who are transitioning from and Early Head Start program.	Verifying Eligibility - Age & Income	Policy Council Board of Education MH Manager Executive Director	Eligibility Criteria
		5. If a program operates a Migrant and Seasonal Head Start program, children younger than age three participating in the program remain eligible until they turn three years old consistent with paragraph (j)(2) of this section.				

		(k) Records (1) A program must keep eligibility determination records for each participant and ongoing records of the eligibility training for staff required by paragraph (m) of this section. A program may keep these records electronically.	MCHS maintains records for all children in software database (COPA) and paper file on-site. The child's paper file is kept on site through the duration of enrollment and 1 year thereafter. The file is then stored for an additional 2 years and then destroyed.	Verifying eligibility - Age & Income	Family Advocate MH Manager Executive Director	COPA Child File (paper copy) Personnel Files
	2. Each eligibility determination record must include: (i) Copies of any documents or statements, including declarations, that are deemed necessary to verify eligibility under paragraphs (h) and (i) of this section; (ii) A statement that program staff has made reasonable efforts to verify information by: A. Conducting either an in-person, or a telephone interview with the family as described under paragraph	MCHS maintains child file records that includes eligibility verification documentation, income verification, case notes, any and all releases of information	Verifying eligibility - Age & Income Application process	Family Advocate	Child File COPA	

		(a)(1)(i) or (a)(2) of this section; and, B. Describing efforts made to verify eligibility, as required under paragraphs (h) through (i) of this section; and, collecting documents required for third party verification that includes the family's written consent to contact each third party, the third parties' names, titles, and affiliations, and information from third parties regarding the family's eligibility.				
		(i) Program policies and procedures on violating eligibility determination regulations. A program must establish written policies and procedures that describe all actions taken against staff who intentionally violate Federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Head Start services	MCHS has adopted such policies into the personnel policy manual. All MCHS staff who make any determination or assessment of eligibility verification, Board of Education members, and Policy Council members are trained on the policy.	Code of Conduct	Executive Director MH Manager	Personnel Policy

		(m) Training on Eligibility. (1) A program must train all governing body, policy council, management, and staff who determine on applicable federal regulations and program policies and procedures. Training must at a minimum: (i) Include methods on how to collect complete and accurate eligibility information from families and third party sources; (ii) Incorporate strategies for treating families with dignity and respect and for dealing with possible issues of domestic violence, stigma, and privacy; and, iii. Explain program policies and procedures that describe actions taken against staff, families, or participants who attempt to provide or intentionally provide false information.	MCHS ensures required training on eligibility is provided per the guidance of the Final Rule. Training documentation is kept in each individual staff's personnel file. Training documentation for Board of Education and Policy Council is documented in meeting minutes and attendance roster.	ERSEA Eligibility Training	Executive Director	Personnel Policy Personnel file Board of Education & Policy Council Meeting Minutes
	2. A program must train management and staff members who make eligibility determinations within 90 days of hiring new staff.	MCHS provides eligibility training to all required staff within 90 days of hire.	ERSEA Eligibility Training	Executive Director	New employee orientation check off list	

		(3). A program must train all governing body and policy council members within 180 days of the beginning of the term of a new governing body or policy council.	MCHS provides eligibility training to Board of Education and Policy Council annually at governance training.	ERSEA Eligibility Training	Executive Director	Board of Education & Policy Council meeting minutes
		(4). A program must develop policies on how often training will be provided after the initial training.	MCHS provides eligibility training annually at the agency in-service prior to the beginning of the program year. MCHS may at any time determine the need for additional / individual trainings for staff.	ERSEA Eligibility Training	Executive Director	In-service training agenda
1302.13 Recruitment of children		In order to reach those most in need of services, a program must develop and implement a recruitment process designed to actively inform all families with eligible children within the recruitment area of availability of program services. A program must include modern technologies to encourage and assist families in applying for admission to the program, and to reduce the family's administrative and paperwork burden in	MCHS engages in a comprehensive cyclical recruitment plan that is re-evaluated and implemented each January respectively. MCHS develops a marketing strategy / plan based on information gathered from the community needs assessment. MCHS partners with local community resources such as Department of Job & Family Services, WIC, Family and Children First Council,	Recruitment	Management Team	Recruitment Strategy / Plan Recruitment materials & resources

		the application and enrollment process. A program must include specific efforts to actively locate and recruit children with disabilities and other children in need, including children experiencing homelessness and children in foster care.	Educational Service Center, Celina City Schools, homeless shelters, mental health providers, and food banks to recruit families eligible for the program. MCHS utilizes modern technological tools to support families (i.e. QR codes linking to intake forms, texting capabilities, and social media, etc.)		
1302.14 Selection process.	(a) Selection Criteria (1) A program must annually establish selection criteria that weigh the prioritization of selection of participants, based on community needs identified in the community needs assessment as described in 1302.11(b), and including family income, whether the child is homeless, whether the child is in foster care, the child's age, whether the child is eligible for special education and related services, or early intervention services, as appropriate, as determined under the Individuals with Disabilities Act (IDEA) (20	MCHS reviews the eligibility criteria annually in conjunction with the Community Needs Assessment. MCHS ensures that prioritization of criteria includes income, homelessness, foster care, disabilities, and age. MCHS annually determines the other relevant risk factors to families and children. These risk factors will be considered in November.	Selection Criteria Community Needs Assessment	MH Manager	Selection Criteria Community Needs Assessment

		U.S.C. 1400 et seq.) and other relevant family or child risk factors.	Selection Criteria is approved by Policy Council and Board of Education.			
		2. An Indian tribe that operates a Head Start program must annually establish selection criteria that weigh the prioritization of selection of participants, based on community needs identified in the community needs assessment as described in § 1302.11(b), and may, at its discretion, give priority to children in families for which a child, a family member, or a member of the same household, is a member of an Indian Tribe, and would benefit from the Head Start program.				
		(3) If a program serves migrant or seasonal families, it must annually establish selection criteria that weigh the prioritization of selection of participants, based on community needs identified in the community needs assessment as described in § 1302.11(b), and give priority to children	MCHS does not operate a seasonal migrant program.			

		whose families can demonstrate they have relocated frequently within the past two-years to pursue agricultural work.				
		(4). If a program operates in a service area where Head Start preschool eligible children can enroll in high-quality publicly funded pre-kindergarten for a full school day, the program must prioritize younger children as part of the selection criteria in paragraph (a)(1) of this section. If this priority would disrupt partnerships with local education agencies, then it is not required. An American Indian and Alaska Native or Migrant or Seasonal Head Start program must consider whether such prioritization is appropriate in their community.	A MCHS selection criterion ensures that the age of each child is considered as well as the best placement for the child. MCHS establishes recruitment efforts and targeted population within the Memorandums of Understanding with LEAs and ESCs.	Selection Criteria	Executive Director	Eligibility Criteria Memorandum of Understanding
		5. A program must not deny enrollment based on a disability or chronic health condition or its severity.	MCHS evaluates internal and external resources available to ensure a positive placement for children with disabilities or with chronic health conditions.	Plan of Action	Executive Director Early Childhood Services Director	Case Conference Plan of Action

			MCHS will develop plans of action with families to implement services available to children with disabilities or chronic health conditions.	Health & Safety Manager Mental Health Manager	
		(6). A program may consider the enrollment of children of staff members as part of the selection criteria in paragraph (a)(1) of this section.			Selection Criteria
	(b) Children eligible for services under IDEA. (1) A program must ensure at least 10 percent of its total actual enrollment is filled by children eligible for services under IDEA, unless the responsible HHS official grants a waiver.	MCHS serves at a minimum 10% of actual enrollment as identified children receiving IEP services. All children are screened utilizing a research and or evidence-based tool within 45 days of entry. Education staff and parents utilize screening and assessment results to determine if a child is in need for further evaluation. In the event that a child requires, or it is deemed necessary for further evaluation, a release of information is obtained by the parent to	Enrollment of Children with Special Needs	Executive Director MH Manager Early Childhood Services Director	IEP Referral for evaluation Memorandum of Understanding

			begin the referral process to Mercer County ESC.			
		2. If the requirement is paragraph (b)(1) of this section has not been met, children eligible for services under IDEA should be prioritized for the available slots in accordance with the program's selection criteria described in paragraph (a) of this section	MCHS allocates priority points to children identified with an IEP and those children suspected of having delays or disabilities.	Executive Director MH Manager	Selection Criteria	
		C. Waiting Lists. A program must develop at the beginning of each enrollment year and maintain during the year a waiting list that ranks children according to the program's selection criteria.	MCHS maintains a waiting list for all children who have applied for services. The database software system, COPA prioritizes the wait list based on eligibility criteria.	MH Manager	Enrollment	COPA
		d. Understanding barriers to enrollment. A program is required to use data from the community assessment to identify the population of eligible children and families and potential barriers to	MCHS reviews enrollment processes and data annually during self-assessment as part of the ERSEA monitoring tool.	MH Manager		Self-Assessment

		enrollment and attendance, including using data to understand access to transportation for the highest need families. A program must use this data to inform ongoing program improvement efforts as described in 1302.102@ to promote enrolling children most in need of program services.				
1302.15 Enrollment		(a) Funded Enrollment. A program must maintain its funded enrollment level and fill any vacancy as soon as possible. A program must fill any vacancy within 30 days.	MCHS maintains full enrollment. Any vacancy is to be filled within 30 days utilizing the agency waiting list.	Enrollment	MH Manager	COPA
		(b) Continuity of enrollment. (1) A program must make efforts to maintain enrollment of eligible children for the following year.	MCHS informs families of their eligibility for a minimum of two years (with the exception of families who are over income for the program). MCHS allocates eligibility criteria points for returning children.	Verifying Eligibility - Age & Income	Family Advocates MH Manager	Eligibility Criteria
		(2). Under exceptional circumstances, a program may maintain a child's	Based on a child's birth date, s/he may be eligible for a third year.	Verifying Eligibility - Age & Income	Family Advocates	Application packet

		enrollment in Head Start Preschool for a third year, provided that the family income is verified again. A program may maintain a child's enrollment in Early Head Start as described in 1302.12(j) (2).	The family will reapply for services including income verification.			Income verification
		(3). If a program serves homeless children or children in foster care, it must make efforts to maintain the child's enrollment regardless of whether the family or child moves to a different service area, or transition the child to a program in a different service area, as required on 1302.72(a), according to the family's needs.	In the event that a child is accepted / enrolled in the Head Start program and that child has been identified as homeless or placed in foster care, MCHS will make every effort to continue services even if the child leaves the service area, if these services meet the needs of the family.	Continuity of Care	Family Advocates	COPA
		(c). Reserved slots. If a program determines from the community assessment there are families experiencing homelessness in the area, or children in foster care that could benefit from services, the program may reserve one or more enrollment slots for pregnant women and children experiencing homelessness and children	MCHS may reserve enrollment slots for children experiencing homelessness or foster care placement. MH Manager will communicate with the Children Services Director, Mercer County Department of Job & Family Services, regularly to determine if there is a significant increase / decrease in the number of	Reserved Slots	MH Manager	COPA

		in foster care, when a vacancy occurs. No more than 3% of a program's funded enrollment slots may be reserved. If the reserved enrollment is not filled within 30 days, the enrollment slot becomes vacant and then must be filled in accordance with paragraph (a) of this section.	preschool children in foster care. Reserved slots that are not filled within 30 days must be filled.		
		(d) Other enrollment. Children from diverse economic backgrounds, who are funded with other sources, including private pay, are not considered part of a program's eligible funded enrollment.	MCHS only operates a Head Start program funded through federal grants.	Enrollment	MH Manager
		(e). State immunization enrollment requirements. A program must comply with state immunization enrollment and attendance requirements, with the exception of homeless children as described in 1302.16©(1)	MCHS follows the immunization requirements set forth by the licensing agent, Ohio Department of Education & Ohio Department of Health with the exception of homeless children for whom this requirement would create a hardship.	Required immunization Record	Family Advocates Health & Safety Manager
		(f). Voluntary parent participation. Parent	MCHS encourages parents / guardians to participate in all	Family Advocates	Parent Handbook

		participation in any program activity is voluntary, including consent for data sharing, and is not required as a condition of the child's enrollment.	aspects of the Head Start program. However, parent participation or lack thereof does not impact a child's eligibility /acceptance into the program.		
		(g). User-friendly enrollment process. A program must regularly examine their enrollment processes and implement any identified improvements to streamline the enrollment experience for families.	MCHS reviews enrollment processes and data annually during self-assessment as part of the ERSEA monitoring tool.	MH Manager	Self-Assessment
1302.16 Attendance		(a) Promoting regular attendance. A program must track attendance for each child. (1). A program must implement a process to ensure children are safe when they do not arrive at school. If a child is unexpectedly absent and a parent has not been contacted the program within one hour of program start time, the program must attempt to contact the parent to ensure the child's well-being.	MCHS has a comprehensive attendance system to ensure the whereabouts of all enrolled children is accounted for. In the event that a parent /guardian has failed to call into the center to report a child's absence & the reason for the absence, a staff member will attempt to contact the parent / guardian utilizing information provided to the family engagement staff.	FESM Family Advocates Teaching Staff	COPA – Attendance case notes

			Attendance	Family Advocates Teaching Staff	Parent Handbook Parent Education materials COPA Case notes COPA Attendance Case Conference notes Family Engagement Monitoring tool
	<p>(2). A program must implement strategies to promote attendance. At a minimum a program must:</p> <p>(i) Provide information about the benefits of regular attendance;</p> <p>(ii) Support families to promote the child's regular attendance</p> <p>iii. Conduct a home visit or make other direct contact with a child's parents if a child has multiple unexplained absences (such as two consecutive unexplained absences);</p> <p>(iv). Within the first 60 days of program operation, and on an ongoing basis thereafter, use individual child attendance data to identify children with patterns of absence that put them at risk of missing 10% of program days per year and develop appropriate strategies to improve individual attendance among identified children, such as direct contact with parents or intensive case management, as necessary, and</p>	<p>MCHS provides parents with information in regard to attendance in school and the impact on school readiness through the parent handbook, handouts, and newsletters.</p> <p>MCHS teaching staff to provide attendance information and how it impacts School Readiness @ each parent / teacher conference.</p> <p>MCHS staff work with families to develop plans to ensure children attend school every day except when the child is ill.</p> <p>MCHS staff conduct home visits with families to discuss the child's absence from school after 2 unexcused absences from the program.</p> <p>In the event that a child continues to be absent after a Family Advocate has met with a family and developed a plan ensuring the child is in attendance, a case conference will be scheduled between the parent /</p>			

			guardian, a manager, and the director to identify any additional barriers, develop a new plan of action, and to educate the parent on the consequences of continued absences.			
			MCHS management team will review attendance of all children but a primary focus on children with a pattern of absenteeism beginning 60 days after the beginning of the program year & regularly thereafter as described on the family engagement services monitoring tool.			
	(v). Examine barriers to regular attendance, such as access to safe and reliable transportation, and where possible, provide or facilitate transportation for the child if needed;	MCHS reviews attendance monthly and overall processes and data annually during self-assessment as part of the ERSEA monitoring tool. During monthly reviews, FAs and MH Manager work collaboratively with families to alleviate barriers. If transportation is identified as a barrier, local resources are shared with the family.		Family Advocates MH Manager	Self-Assessment Family Partnership Agreements	
	(3). If a child ceases to attend, the program must	MCHS will expend every effort to maintain contact	Attendance	MH Manager	COPA case notes	

		make appropriate efforts to reengage the family to resume attendance, including as described in paragraph (a)(2) of this section. If the child's attendance does not resume, then the program must consider the slot vacant. This action is not considered expulsion as described in 1302.17.	and engagement with families who have ceased to send their child to the program. These efforts include but are not limited to phone calls, letters, and home visits.		Family Advocates	
	(b) Managing systematic program attendance issues. If a program's monthly average daily attendance rate falls below 85 percent, the program must analyze the causes of absenteeism to identify any systematic issues that contribute to the program's absentee rate. The program must use this data to make necessary changes in a timely manner as part of ongoing oversight and correction as described in §1302.102(b) and inform its continuous improvement efforts as described in §1302.102(c).	The MH Manager reviews attendance data at the end of each month. Awareness and attention is brought to classrooms and individuals with the highest attendance and the lowest attendance. Monthly, as part of the MH Manager monitoring tool, attendance is evaluated to determine root causes to chronic absenteeism and set the framework to build individualized plans with families who struggle maintaining regular attendance. Referrals for additional services such as transportation are made when needed.			MH Manager	Monitoring tools

		(c) Supporting attendance of homeless children. (1) If a program determines a child is eligible under §1302.12(c)(1)(iii), it must allow the child to attend for up to 90 days or as long as allowed under state licensing requirements, without immunization and other records, to give the family reasonable time to present these documents. A program must work with families to get children immunized as soon as possible in order to comply with state licensing requirements. (2) If a child experiencing homelessness is unable to attend classes regularly because the family does not have transportation to and from the program facility, the program must utilize community resources, where possible, to provide transportation for the child.				
1302.17 Suspension & expulsion		(a) Limitations on suspension (1) A program must prohibit or severely limit the use of suspension due to a child's behavior. Such suspensions	MCHS utilizes many strategies to avoid temporary suspensions.	Temporary Suspension	Teaching Staff Family Advocate Mental Health	Request for Individual Observation Request for Consultation

		<p>may only be temporary in nature.</p> <p>(2). A temporary suspension must be used only as a last resort in extraordinary circumstances where there is a serious safety threat that has not been reduced or eliminated by the provision of interventions and supports recommended by the mental health consultant and the program needs time to put additional appropriate services in place.</p> <p>(3). Before a program determines whether a temporary suspension is necessary, a program must engage with a mental health consultant, collaborate with the parents, and utilize appropriate community resources – such as behavior coaches, psychologists, other appropriate specialists, or other resources as needed, to determine no other reasonable option is appropriate.</p> <p>(4) If a temporary suspension is deemed</p>		<p><i>Suspension</i> means the temporary removal of a child from the learning setting due to a child's behavior including requiring the child to cease attendance for a specified period of time, reducing the number of days or amount of time that a child may attend, removing the child from the regular group setting for an extended period of time, or requiring the parent or the parent's designee to pick up a child for reasons other than illness or injury.</p> <p>MCHS utilizes information gathered by the parent and teacher from the ASQ-3, ASQ – SE, DECA screens, classroom observations, and parent observations to determine the correct path of intervention for a child.</p> <p>MCHS engages in a series of case conferences with the parent and the comprehensive team to develop a plan to ensure the child can successfully</p>	<p>Services Manager Mental Health Consultant Executive Director Early Childhood Services Director</p>	<p>ASQ – 3 ASQ – SE DECA Individual Child Plan Case Conference COPA Referrals</p>
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		<p>necessary, a program must help the child return to full participation in all program activities as quickly as possible while ensuring child safety. A program must explore all possible steps and document all steps taken to address the behavior(s) and supports needed to facilitate the child's safe reentry and continued participation in the program. Such steps must include, at a minimum:</p> <p>(i). Continuing to engage with the parents, mental health consultant, and other appropriate staff, and continuing to utilize appropriate community resources;</p> <p>(ii). Providing additional program supports and services, including home visits;</p> <p>(iii). Determining whether a referral to a local agency responsible for implementing IDEA is appropriate, or if the child has an individualized family service plan (IFSP) or individualized education</p>	<p>maintain placement within the classroom.</p> <p>MCHS with parent permission will utilize all resources available both internal collaborative partners (mental health consultant) and external community partners to develop aforementioned plan.</p> <p>All referrals made to support both family & child will be documented in COPA system.</p> <p>If the multi-disciplinary team, which includes the parent / guardian, feels that more additional referrals are necessary to the LEA for further evaluation and assessment, MCHS staff will support the parent / guardian throughout the process.</p> <p>If the multi-disciplinary team, which includes the parent / guardian, decides that a modified schedule is in the best interest for the safety of the individual child</p>		
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		program (IEP), consulting with the responsible agency to ensure the child receives the needed support services.	and the remaining children in the classroom, a plan for intervention services outside of the classroom must be established. Additionally, a re-entry plan must be developed ensuring that the child returns to the classroom as quickly as possible.			
		<p>(b). Prohibition on expulsion.</p> <p>(1). A program cannot expel or un-enroll a child from Head Start because of a child's behavior.</p> <p>(2). When a child exhibits persistent and serious behavioral concerns, a program must explore all possible steps and document all steps taken to address such problems, and facilitate the child's safe participation in the program. Such steps must include, at a minimum, engaging a mental health consultant, considering the appropriateness of providing appropriate services and supports under section 504 of the Rehabilitation Act of 1973</p>	<p>MCHS utilizes many options to avoid expulsions both permanent and or temporary for each child.</p> <p>MCHS utilizes information gathered by the parent and teacher from the ASQ-3, ASQ – SE, DECA screens, classroom observations, and parent observations to determine the correct path of intervention for a child.</p> <p>MCHS engages in a series of case conferences with the parent and the comprehensive team to develop a plan to ensure the child can successfully maintain placement within the classroom.</p>			

		<p>to ensure that the child who satisfies the definition of disability in 29 U.S.C. 705(9)(b) of the Rehabilitation Act is not excluded from the program on the basis of disability, and consulting with the parents and the child's teacher and:</p> <p>(i) If the child has an individualized family service plan (IFSP) or individualized education program (IEP), the program must consult with the agency responsible for the IFSP or IEP to ensure the child receives the needed support services; or,</p> <p>(ii). If the child does not have an IFSP or IEP, the program must collaborate, with parental consent, with the local agency responsible for implementing IDEA to determine the child's eligibility for services.</p> <p>(3). If, after a program has explored all possible steps and documented all steps taken as described in paragraph (b)(2) of this section, a program in consultation with the parents, the child's teacher,</p>	<p>MCHS, with parent permission will utilize all resources available both internal collaborative partners (mental health consultant) and external community partners to develop aforementioned plan.</p> <p>All referrals made to support both family & child will be documented in COPA system.</p> <p>If the comprehensive team, which includes the parent / guardian, feels that more additional referrals are necessary to the LEA for further evaluation and assessment, MCHS staff will support the parent / guardian throughout the process.</p> <p>If the comprehensive team, which includes the parent / guardian, decides that a temporary expulsion from the classroom is in the best interest for the safety of the individual child and the remaining children in the</p>		
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		<p>the agency responsible for implementing IDEA (if applicable) , and the mental health consultant , determines that the child's continued enrollment presents a continued serious safety threat to the child or other enrolled children and determines the program is not the most appropriate placement for the child, the program must work with such entities to directly facilitate the transition of the child to a more appropriate placement.</p>	<p>classroom, a plan for intervention services outside of the classroom must be established. Additionally, a re-entry plan must be developed ensuring that the child returns to the classroom as quickly as possible.</p> <p>If the child is receiving IFSP or IEP services, the comprehensive team will include the primary service providers of the IFSP & IEP.</p> <p>If the child is not receiving IFSP or IEP services and the child's screenings, assessments, and observations indicate that a thorough ETR is warranted, a referral will be made to the local LEA / ESC for further evaluation.</p> <p>If the child is receiving IFSP or IEP services and continues to be a serious threat to himself / herself and other children in the classroom, the comprehensive team may determine that a more restrictive environment may be the best placement for</p>			
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1302 Subpart A ERSEA

			the child. MCHS will facilitate the child's transition to a new program.			
1302.18 Fees		(a) Policy on Fees. A program must not charge eligible families a fee to participate in Head Start, including special events such as field trips, and cannot in any way condition an eligible child's enrollment or participation in the program upon the payment of a fee.	MCHS does not charge any fees as a condition of enrollment for eligible families	Family Advocates MH Manager	Parent Handbook	
		(b) Allowable fees (1) A program must only accept a fee from families of enrolled children for services that are in addition to services funded by Head Start, such as childcare before and after funded Head Start hours. A program may not condition a Head Start child's enrollment on the ability to pay a fee for additional hours. (2). In order to support program serving children from diverse economic backgrounds or using multiple funding sources, a	MCHS only operates a federal-funded Head Start program.	Tuition	Board of Education Policy Council	Parent Handbook Personnel Policy

		program may charge fees to private pay families and other non-Head Start enrolled families to the extent allowed by any other applicable federal, state, or local funding sources.				
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Mercer County Head Start Policies and Procedures

P/P Topic:	Community Needs Assessment	P/P #:	
Part:	Program Operations - 1302	PC Approval Date:	10/17/24
Subpart:	<i>A. Eligibility, Recruitment, Selection, Enrollment, Attendance</i>	Last Reviewed Date:	9/14/23
Section Title(s):	<i>Determining community strengths, needs, and resources.</i>	Implementation Responsibility:	Director
Related Performance Standard(s):	1302.11(b)(1)(2)(3)	Monitoring Responsibility:	Director Policy Council Board of Education

(A) Policy	<p>(b) <u>Community wide strategic planning and needs assessment (community assessment)</u>. (1) A program must conduct a community assessment at least once over the five-year grant period and annually review and update if any significant changes are needed as described in paragraph (b)(5) of this section to:</p> <p>(i) Identify populations most in need of services including prevalent social or economic factors, challenges, and barriers experienced by families and children;</p> <p>(ii) Inform the program's design and to ensure equitable, inclusive, and accessible service delivery that reflect needs and diversity of the community;</p> <p>(iii) Inform the enrollment, recruitment, and selection process to prioritize the enrollment of those populations with relevant circumstances identified under paragraph (b)(1)(i) of this section;</p> <p>(iv) Identify strengths and resources in the community that can be leveraged for service delivery, coordination, and partnership efforts for education, health, nutrition, and referrals to social services to eligible children and families; and,</p> <p>v) Identify the communication methods and modalities available to the program that best engage with prospective and enrolled families in accessible ways.</p> <p>(2). In conducting the community assessment, a program must collect and utilize data that describes community strengths, needs, and resources and include, at a minimum:</p> <p>(i) Relevant demographic data about eligible infants, toddlers,</p>
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preschool age children, and expectant mothers, including their geographic location, race, ethnicity, and languages they speak, including:

(A) Race and ethnicity;

(B) Children living in poverty;

(C) Children experiencing homelessness in collaboration with, to the extent possible, McKinney-Vento Local Education Agency Liaisons (42 U.S.C. 11432 (6)(A));

(D) Children in foster care;

(E) Children with disabilities, including types of disabilities and relevant services and resources provided to these children by community agencies;

(F) Geographic location and languages they speak;

(ii). The education, health, nutrition, and social service needs of eligible children and their families, including prevalent social or economic factors, challenges, and barriers to program participation such as transportation needs;

(iii). Typical work, school, and training schedules of parents with eligible children:

(iv). Other child development, child care centers, and family child care programs that serve eligible children, including home visiting, publicly funded State and local preschools, and the approximate number of eligible children served and their ages;

(v). Resources that are available in the community to address the needs of eligible children and their families; and,

(vi). Strengths of the community; and,

(vii) Gaps in community resources in areas relevant to addressing the needs of eligible children and their families such as gaps in health and human services, housing assistance, food assistance, employment assistance, early childhood development, and social services.

(3) Programs should have a strategic approach:

i) To determine what data to acquire to reach goals in paragraph (b)(1) of this section prior to conducting the community assessment; and (ii) For how to use the data acquired to reach goals in paragraph (b)(1) of this section after conducting the

	<p>community assessment.</p> <p>(4) When determining what data to acquire under paragraph (b)(2) of this section programs should consider what information is most relevant to inform services for families most in need. Data gathering should be informed by the program's understanding of the community and be intentionally designed to help the program identify community strengths, needs and resources, and plan the program accordingly. Programs are not required to collect all information themselves; rather programs should utilize community partners and utilize existing available data sources relevant to the local community.</p> <p>(5) A program must annually review and, where needed, update the community assessment to identify any significant shifts in community demographics, needs, and resources that may impact program design and service delivery. As described in paragraph (b)(4) of this section, programs should consider results from their self-assessment as required in subpart J of this part (§§ 1302.101 through 1302.103) and their annual funding application to inform this process. The annual update review must consider at a minimum: changes related to children and families experiencing homelessness; how the program addresses equity, accessibility, and inclusiveness in its provision of services; and changes including to the availability of publicly-funded pre-kindergarten and whether it meets the needs of the families. Programs must consider how the annual review and update can inform and support management approaches for continuous quality improvement, program goals, and ongoing oversight.</p> <p>(6) A program must consider whether the characteristics of the community allow it to include children from diverse economic backgrounds that would be supported by other funding sources, including private pay, in addition to the program's eligible funded enrollment. A program must not enroll children from diverse economic backgrounds if it would result in a program serving less than its eligible funded enrollment.</p>
(B) Responsibility	Director

(C) Procedure	<p>At a minimum, once during the 5-year grant cycle, the Director will complete a thorough Community Needs Assessment as prescribed by the Performance Standards utilizing multiple sources of data including but not limited to internal school readiness data, family demographic data, and PIR data. Externally, the Director will gather data from local resources (i.e. annual reports, community reports), state level resources (i.e. ODH, ODE, ODJFS), and national resources (i.e. US Census, Child Data Reports, etc.)</p> <p>In addition, the Director will update the Community Needs Assessment annually, providing the grantee with any NEW information pertinent to services in the community that would directly impact the grantee's service area, targeted population, or ability to provide adequate services to eligible families. The Community Needs Assessment will be used to support any grant applications, decision-making for service area, types of services available to families including program design & option. The Community Needs Assessment is referenced to assist with developing, reviewing, revising the grantee's eligibility criteria.</p> <p>The program's strategic approach to collecting data relies heavily on maintaining presence in multiple community committees to allow access to data. The program receives and collects relevant data throughout the program year. Data is stored to be revisited at the time of development of the community needs assessment. A community needs assessment checklist guides the development ensuring all required areas are included.</p> <p>The community needs assessment should reflect the entire community allowing decisions to be made on the availability and / or future development of services for the entire community (diverse backgrounds) ensuring Head Start eligible families are served.</p> <p><u>Community Needs Assessment Checklist</u></p> <ol style="list-style-type: none"> 1. Identify population most in need of services 2. Identify prevalent socio-economic factors, challenges, barriers 3. Identify strengths and resources in the community 4. Partnership efforts for education, health, nutrition, and social services 5. Identify communication methods to best engage with families 6. Relevant demographic data on eligible children, families, and expectant families (race, ethnicity, poverty, homelessness, foster care, children with disabilities [types and services available]. 7. Geographic location and languages 8. Challenges and barriers to participation
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	<ul style="list-style-type: none">9. Typical work and school schedules of parents10. Other childcare / development center / programs to serve eligible children11. Gaps in community resources to address needs of eligible children and families
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Mercer County Head Start Policies and Procedures

P/P Topic:	Verifying eligibility - Income	P/P #:	
Part:	1302 Program operations	PC Approval Date:	10/17/24
Subpart:	<i>A Eligibility, Recruitment, Selection, Enrollment, and Attendance</i>	Last Reviewed Date:	10/5/23
Section Title(s):	<i>Determining, verifying, and documenting eligibility</i>	Implementation Responsibility:	Family Advocates
Related Performance Standard(s):	1302.12 (c), (i)(1)(2)(3)(4)	Monitoring Responsibility:	MH Manager

(A) Policy	<p>(i). Verifying Eligibility</p> <p>To verify eligibility based on income, program staff must use tax forms, pay stubs, or other proof of income to determine the family income for the relevant time period.</p> <ul style="list-style-type: none"> i) The program must calculate total gross income using applicable sources of income. ii) A program may make an adjustment to a family's gross income calculation for the purposes of determining eligibility to account for excessive housing costs. A program may use available bills, bank statements, and other relevant documentation provided by the family to calculate total annual housing costs with appropriate multipliers to: (A) Determine if a family spends more than 30 percent of their total gross income on housing costs, as defined in part 1305 of this chapter; and <p>(B) If applicable, reduce the total gross income by the amount spent on housing costs that exceed more than 30 percent.</p> <p>(iii). If the family cannot provide tax forms, pay stubs, or other proof of income for the relevant time period, program staff may accept written statements from employers, including individuals who are self-employed, for the relevant time period and use information provided to calculate total annual income with appropriate multipliers.</p> <p>i. If the family reports no income for the relevant time period, a program may accept the family's signed declaration to that effect, if program staff describes efforts made to verify the family's income, and explains how the family's total income was</p>
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	<p>calculated or seeks information from third parties about the family's eligibility, if the family gives written consent. If a family gives consent to contact third parties, program staff must adhere to program safety and privacy policies and procedures and ensure the eligibility determination record adheres to paragraph (k)(2) of this section.</p> <p>v.If the family can demonstrate a significant change in income for the relevant time period, program staff may consider current income circumstances.</p>
(B) Responsibility	Family Advocates
(C) Procedure	<p>The family advocate will assist the parent / guardian in completing the income verification document.</p> <p>If the family is eligible for or is receiving childcare benefits or other benefits deemed TANF (including SSI and SNAP), the appropriate box will be marked on the income verification form.</p> <p>Each family will complete a residency document. This document outlines the parameters of the <i>McKinney Vento</i> definition of homeless. If the family indicates that they are homeless the appropriate box will be marked on the income verification form.</p> <p>During the application, if the parent / guardian indicate that the child is in foster care or an out of home placement based on court order, the Family Advocate will obtain a release of information to obtain the legal documentation to verify placement. In the event that the child's placement meets the definition of foster care, the appropriate box will be marked on the income verification for.</p> <p>It is the responsibility of the Family Advocate to help secure this documentation once the child is enrolled in the program.</p> <p>During the application process the parent / guardian must provide documentation to prove the family's income or lack thereof. Documentation accepted includes: tax forms, pay stubs, written statements from employers, self-employment disclosures for the relevant time period (12 months either immediately previous to the application date or the previous calendar year tax forms), SNAP eligibility confirmation and a copy of the family's SNAP card are sufficient. Applicants can provide a written statement declaring their income without documentation provided.</p> <p>If the family reports that a significant change has happened in the relevant time period, family advocates may calculate income based on <i>current circumstances</i>.</p> <p><i>Relevant time period</i> means:</p>

- (1) The 12 months preceding the month in which the application is submitted; or
(2) During the calendar year preceding the calendar year in which the application is submitted, whichever more accurately reflects the needs of the family at the time of application.

During the interview process, family advocates can request documentation of housing expenses / costs as defined as *Housing costs* means the total annual applicable expenses on housing which may include rent or mortgage payments, homeowner's or renter's insurance, utilities, interest, and taxes on the home. Utilities include electricity, gas, water, sewer, and trash. Utilizing the agency's housing cost calculation form, the family advocate can calculate if the applicant's housing costs account for more than 30% of their total income. If the family's housing costs account for more than 30% of their income, the amount over 30% can be deducted from the total income to determine if the family is income eligible for the program.

When calculating income based on current circumstances, the family must demonstrate and provide documentation that a significant event has occurred impacting their income and standard of living (i.e. employer abruptly laid off staff and employment benefits are significantly different than normal income expected). The family advocate is to use the current income the family is receiving and "project" income to reflect a 12-month period of time. If that income amount falls at or below the FPL, the family can be deemed eligible. The current circumstances must be documented on the income verification form.

The Family Advocate will calculate the family's total income. If the total income falls at or below the federal poverty guidelines the family is deemed eligible for services. If the family's income is above the federal poverty guidelines, the family can be considered for services but is deemed ineligible.

The income verification form must be reviewed and signed by a parent / guardian, and staff member completing the form. The form is then reviewed for accuracy by the Mental Health Manager and Executive Director.

Eligibility is good for 2 program years.

Mercer County Head Start Policies and Procedures

P/P Topic:	Recruitment	P/P #:	
Part:	1302 Program Operations	PC Approval Date:	10/17/24
Subpart:	A	Last Reviewed Date:	9/14/23
Section Title(s):	<i>Recruitment of Children</i>	Implementation Responsibility:	MH Mgr Family Advocates
Related Performance Standard(s):	1302.13	Monitoring Responsibility:	Director

(A) Policy	In order to reach those most in need of services, a program must develop and implement a recruitment process designed to actively inform all families with eligible children within the recruitment area of the availability of program services. A program must include modern technologies to encourage & assist families in applying for admission to the program, and to reduce the family's administrative and paperwork burden in the application and enrollment process. A program must include specific efforts to actively locate and recruit children with disabilities and other children in need, including children experiencing homelessness and children in foster care.
(B) Responsibility	All Staff
(C) Procedure	<p>The MH Mgr is responsible for developing a recruitment plan for the agency.</p> <p>The recruitment plan should utilize data from the community needs assessment, internal enrollment & attendance data derived from COPA, local trends and patterns within the community.</p> <p>The recruitment plan is due for governing board (PC & Board) revision and review the month of December, annually.</p> <p>In January, MCHS will hold the annual kick off meeting.</p> <p>♦ Recruitment plans will be shared with social service staff each year in January</p> <p>In order to recruit those children most in need of Head Start services, agency will adhere to the following:</p> <p>♦ Staff will actively recruit program eligible families 12 months a year.</p> <p>♦ Head Start services will be advertised through the media on a regular basis including services to children with disabilities, experiencing foster / kinship care, and homelessness.</p> <p>♦ Recruitment tasks will include but are not limited to the following methods:</p> <ul style="list-style-type: none"> • Electronic media, email, Facebook, Twitter, etc.; • Presentations to community agencies and organizations; • News releases of major recruitment dates, specific activities, and program services;

	<ul style="list-style-type: none"> • Radio announcements and public service announcements; • Placing flyers, brochures, and posters in target areas; • Canvassing door to door; • Family referrals and referrals from other agencies (i.e. Family and Children First Councils/Committees, Early Intervention, WIC, DD, Parents). <p>As technological advancements become available (i.e. QR codes, online form completion) MCHS will integrate these mechanisms into the recruitment plan to alleviate any burdens that may become barriers to families.</p> <p>Application and enrollment appointments are to be conducted in-person, that means, staff will meet families in whatever environment is most conducive to the family (with safety considerations in place).</p> <p>♦ All recruitment efforts will be documented.</p>
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Mercer County Head Start Policies and Procedures

P/P Topic:	Selection Criteria	P/P #:	
Part:	1302 Program Operations	PC Approval Date:	9/12/24
Subpart:	A. ERSEA	Last Reviewed Date:	9/14/23
Section Title(s):	Selection process	Implementation Responsibility:	Head Start Director
Related Performance Standard(s):	1302.14 (a)(b)(c)	Monitoring Responsibility:	Governing Body

(A) Policy	<p>A program must annually establish selection criteria that weigh the prioritization of selection of participants, based on community needs identified in the community needs assessment as described in 1302.11(b), and including family income, whether the child is homeless, whether the child is in foster care, the child's age, whether the child is eligible for special education and related services, or early intervention services, as appropriate, as determined under the Individuals with Disabilities Education Act (IDEA)(20 U.S.C. 1400 et.seq.) and, other relevant family or child risk factors</p> <p>(4) If a program operates in a service area where Head Start Preschool eligible children can enroll in high-quality publicly funded pre-kindergarten for a full school day, the program must prioritize younger children as part of the selection criteria in paragraph (a)(1) of this section. If this priority would disrupt partnerships with local education agencies, then it is not required. An American Indian and Alaska Native or Migrant or Seasonal Head Start program must consider whether such prioritization is appropriate in their community.</p> <p>(5) A program must not deny enrollment based on a disability or chronic health condition or its severity.</p> <p>(6) A program may consider the enrollment of children of staff members as part of the selection criteria in paragraph (a)(1) of this section.</p>
(B) Responsibility	Director

(C) Procedure	<p>Annually, the Director and ERSEA team will review the community needs assessment, community trends and patterns, and enrollment trends and patterns.</p> <p>The Director will then draft a selection criteria that represents the children and families most in need of Head Start services in the service area.</p> <p>The Director will review and present the proposed selection criteria to the Policy Council for comment, review, and approval.</p> <p>The Director will then present the proposed selection criteria to the Board of Education for comment, review, and approval.</p>
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Mercer County Head Start Policies and Procedures

P/P Topic:	Enrollment of Children with Special Needs	P/P #:	
Part:	1302 – Program Operations	PC Approval Date:	10/17/24
Subpart:	A. ERSEA	Last Reviewed Date:	
Section Title(s):	Selection process	Implementation Responsibility:	Family Advocates
Related Performance Standard(s):	1302.14(b)(1)(2)	Monitoring Responsibility:	MH Manager

(A) Policy	<p>(b) Children eligible for services under IDEA. (1) A program must ensure at least 10 percent of its total actual funded enrollment is filled by children eligible for services under IDEA, unless the responsible HHS official grants a waiver.</p> <p>(2) If the requirement in paragraph (b)(1) of this section has been met, children eligible for services under IDEA should be prioritized for the available slots in accordance with the program's selection criteria described in paragraph (a) of this section.</p>
(B) Responsibility	Family Advocates
(C) Procedure	<p>MCHS recruits children requiring specialized services due to special needs by ensuring that verbiage is shared on recruitment materials and during presentations in the community.</p> <p>MCHS selection criteria prioritizes serving children who need or may need specialized services by allocating weighted points when these children are being considered for enrollment.</p> <p>To ensure the program is compliant with the 10% actual enrollment requirement to serve children requiring specialized services (IEP) the MH Manager will monitor enrollment reporting monthly. The 10% threshold is calculated by dividing the total number of children on IEPs by the total number of children served that month.</p> <p>The ECSD will ensure all special education information is entered in the COPA system for children receiving those services on a monthly basis.</p>

Mercer County Head Start Policies and Procedures

P/P Topic:	Attendance	P/P #:	
Part:	1302	PC Approval Date:	10/17/24
Subpart:	<i>A Eligibility, Recruitment, Selection, Enrollment, and Attendance</i>	Last Reviewed Date:	10/5/23
Section Title(s):	Attendance	Implementation Responsibility:	Education staff, family advocates, secretaries
Related Performance Standard(s):	1302.16 (a)(b)(c)	Monitoring Responsibility:	MH Mgr

(A) Policy	<p>Attendance is taken daily.</p> <p>(a) Promoting regular attendance. A program must track attendance for each child.</p> <p>(1) A program must implement a process to ensure children are safe when they do not arrive at school. If a child is unexpectedly absent and a parent has not contacted the program within one hour of program start time, the program must attempt to contact the parent to ensure the child's well-being.</p> <p>(2) A program must implement strategies to promote attendance. At a minimum, a program must:</p> <p>(i) Provide information about the benefits of regular attendance;</p> <p>(ii) Support families to promote the child's regular attendance;</p> <p>(iii) Conduct a home visit or make other direct contact with a child's parents if a child has multiple unexplained absences (such as two consecutive unexplained absences); and,</p> <p>(iv) Within the first 60 days of program operation, and on an ongoing basis thereafter, use individual child attendance data to identify children with patterns of absence that put them at risk of missing ten percent of program days per year and develop appropriate strategies to improve individual attendance among identified children, such as direct contact with parents or intensive case management, as necessary; and</p> <p>(v) Examine barriers to regular attendance, such as access to safe and reliable transportation, and where possible, provide or facilitate transportation for the child if needed.;</p> <p>(3) If a child ceases to attend, the program must make appropriate</p>
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	<p>efforts to reengage the family to resume attendance, including as described in paragraph (a)(2) of this section. If the child's attendance does not resume, then the program must consider that slot vacant. This action is not considered expulsion as described in §1302.17.</p> <p>(b) Managing systematic program attendance issues. If a program's monthly average daily attendance rate falls below 85 percent, the program must analyze the causes of absenteeism to identify any systematic issues that contribute to the program's absentee rate. The program must use this data to make necessary changes in a timely manner as part of ongoing oversight and correction as described in §1302.102(b) and inform its continuous improvement efforts as described in §1302.102(c).</p> <p>(c) Supporting attendance of homeless children.</p> <p>(1) If a program determines a child is eligible under §1302.12(c)(1)(iii), it must allow the child to attend for up to 90 days or as long as allowed under state licensing requirements, without immunization and other records, to give the family reasonable time to present these documents. A program must work with families to get children immunized as soon as possible in order to comply with state licensing requirements.</p> <p>(2) If a child experiencing homelessness is unable to attend classes regularly because the family does not have transportation to and from the program facility, the program must utilize community resources, where possible, to provide transportation for the child.</p>
(B) Responsibility	Education staff, family advocates
(C) Procedure	<p>Attendance is taken as each child enters the classroom. This is kept on a "hard-copy" attendance document.</p> <ul style="list-style-type: none"> • Attendance is recorded within COPA by the teaching staff within the first 30 minutes of children's arrival. Children are marked "present", "absent (excused)" or "absent (not excused)" in the agency tracking system. • Absences due to child illness, Dr. appointment, or emergency/death in the family are marked as "absent (excused)". All other absences are considered unexcused. Whenever possible, staff is to document the reason for the absence in the agency tracking system. • Tracking absences are as follows: <ol style="list-style-type: none"> 1) Parents are to notify the agency by call or text to account for each day their child cannot attend and to explain the reason for the absence. It is the parent's responsibility to keep their phone number current and to update the One Call system. 2) A Family Advocate or MH Mgr will send a text message through One Call to notify the parent if the child has not been called in absent for the day and will then document this in the

	<p>agency data system.</p> <p>3). A Family Advocate or Secretary will attempt to contact the parent via the most updated phone number provided in the child's record the day of the child's absence.</p> <p>4) After 2 consecutive days or frequent intermittent days of absence with no contact with the family, an agency staff person will go to the home and leave a note asking the family to contact the agency within 2 days.</p> <p>5) If there is no contact with family within 2 days of the visit to the home, a letter is sent to the family. The letter will explain agency attendance policy as well as the need to develop appropriate family support or "attendance plan" (see below for a definition of this) with the family to assist in making sure the child attends school on a regular basis.</p> <p>6) If the child continues to be absent and there has been no contact with the family, a letter is sent to the family by the MH Mgr explaining that the child will be moved to the agency wait list by a stated date if still no family contact.</p> <ul style="list-style-type: none"> • All attempts, whether calls, texts, letters, etc., are documented in the agency data base within 24 hours, at the latest. All letters are scanned into the data base and or placed in the child's permanent file.. <p><u>Attendance Plan:</u> is designed to assist and support the family in establishing regular attendance. This plan will be detailed and specific so family and agency staff is clear with the goal and action steps.</p> <p>The MH Manager reviews attendance data at the end of each month. Awareness and attention is brought to classrooms and individuals with the highest attendance and the lowest attendance. Monthly, as part of the MH Manager monitoring tool, attendance is evaluated to determine root causes to chronic absenteeism and set the framework to build individualized plans with families who struggle maintaining regular attendance. Referrals for additional services such as transportation are made when needed.</p>
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Mercer County Head Start Policies and Procedures

P/P Topic:	Temporary Suspensions	P/P #:	
Part:	1302	PC Approval Date:	10/17/24
Subpart:	<i>A Eligibility, Recruitment, Selection, Enrollment, and Attendance</i>	Last Reviewed Date:	
Section Title(s):	Suspension and expulsion	Implementation Responsibility:	Education staff, family advocates
Related Performance Standard(s):	1302.17	Monitoring Responsibility:	MH Mgr

(A) Policy	<p>(a) Limitations on suspension</p> <p>(1) A program must prohibit or severely limit the use of suspension due to a child's behavior. Such suspensions may only be temporary in nature.</p> <p>(2). A temporary suspension must be used only as a last resort in extraordinary circumstances where there is a serious safety threat that has not been reduced or eliminated by the provision of interventions and supports recommended by the mental health consultant and the program needs time to put additional appropriate services in place.</p>
(B) Responsibility	Education staff, family advocates
(C) Procedure	<p><i>Suspension</i> means the temporary removal of a child from the learning setting due to a child's behavior including requiring the child to cease attendance for a specified period of time, reducing the number of days or amount of time that a child may attend, removing the child from the regular group setting for an extended period of time, or requiring the parent or the parent's designee to pick up a child for reasons other than illness or injury.</p> <p>Extraordinary Circumstances is defined as situations that are unexpected, unusual, and beyond the control of a person or organization. These circumstances are so extreme that they could not have been predicted or prevented by reasonable measures.</p> <p>Staff are to utilize every tool, skill, and resource available to identify any potential behavioral concerns. This process begins at application, identifying any developmental, behavioral, environmental, or familial conditions that could potentially result in abhorrent behaviors or the need for additional assistance in the</p>

learning environment. Whenever possible, the child is to accompany the parent to the enrollment appointment in the learning environment. This allows the opportunity for staff to observe the child in a new environment (not their home). The MH Consultant and or MH Manager can observe the child and conduct additional interviewing with the parent if warranted. The ASQ-3 and the ASQ-SE is to be completed at the enrolment appointment. Scores from the ASQ-3 and ASQ-SE are to be reviewed by the ECSD and MH Manager. Classroom placement and program option are partially determined by information gathered at the enrollment appointment. In addition to gathering required enrollment information, staff are to determine if the child has attended other early education and care programs. If so, staff are to obtain a release of information for the other program to gather information on the child's attendance and developmental information.

During the enrollment interview, staff are to be aware of any information regarding a student's behavior (i.e. lists of medications, diagnosis such as autism, adhd, odd, etc.) or parental history of mental health diagnosis (depression, anxiety) or substance misuse (addiction / alcoholism). The enrollment interview is to be extended gathering as much historical data as possible and obtaining releases of information when appropriate.

When the program receives data that implies, informs, or illustrates that a child has behavioral concerns the following steps will occur:

- Assigned classroom will be informed of the child's potential or actual behaviors
- The MH Consultant & MH Manager will meet with classroom staff to create a Classroom Strategies Plan to support the child in the classroom. This plan MUST be in place prior to the child entering the classroom. If the child is on an IEP the assigned itinerant is to attend this multidisciplinary team meeting.
- Prior to the child entering the program, the MH Manager, MH Consultant, and Head Teacher will meet with the Parent / Guardian to review classroom strategies and provide strategies to support the transition from home to school.
- An ongoing plan including case conferences to discuss the child's progress in the classroom environment is to be created with the parent / guardian.
- The MH Consultant is to provide ongoing support to classroom staff utilizing Conscious Discipline structures and concepts. Tier II intervention strategies are to be modeled in the classroom by the MHC for the education staff and coached thereafter.
- Additional referrals for community resources to support the entire family is to be made when necessary.
- If a child is not receiving IEP services and the MH

	<p>Consultant suspects developmental concerns, staff will facilitate a referral to the local LEA for further evaluation.</p> <ul style="list-style-type: none"> • The multi-disciplinary team will determine the frequency of on-going meetings. • The multi-disciplinary team will define “success” for the child in the classroom environment. <p>If the program enrolls a child and has no feasible reason to believe the child will display behavioral concerns, but later the child begins displaying behavioral concerns:</p> <ul style="list-style-type: none"> • The education team is to review DECA scores and determine if the initial score reflects the child’s current behavior. If not, the Head Teacher is to contact the MH Manager for approval of an additional DECA screen. • The MH Manager, MH Consultant, and education team is to meet and review strategies provided through the EDECA system. A Classroom Strategies Plan is developed. If the child is on an IEP the itinerant is to be present at the meeting. • The MH Consultant is to contact the parent to schedule a meeting to discuss the child’s behavior, identify any changes in the home environment, gather more data, review classroom strategies, and create a plan with the parent to support the learning environment plan. Any and all releases of information or referrals will be collected or provided. An ongoing plan including case conferences to discuss the child’s progress in the classroom environment is to be created with the parent / guardian. • The MH Consultant is to provide ongoing support to classroom staff utilizing Conscious Discipline structures and concepts. Tier II intervention strategies are to be modeled in the classroom by the MHC for the education staff and coached thereafter. If a child is not receiving IEP services and the MH Consultant suspects developmental concerns, staff will facilitate a referral to the local LEA for further evaluation. • The multi-disciplinary team will determine the frequency of on-going meetings. • The multi-disciplinary team will define “success” for the child in the classroom environment. <p>When a child’s behavior becomes disruptive for no apparent reason (no historical data, no previous incidents, no screening indications) the multi-disciplinary team will meet to discuss the incident and begin the planning process as described above.</p> <p>When a child’s behavior results in a significant injury to another person (student, staff member, contractor) or running away from staff and exiting the facility (leaving the property) AFTER all strategies and remedies have been attempted, the multi-disciplinary team , led by the MH Consultant with the parent present, will discuss and make a decision as to the child’s need for a temporary</p>
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	<p>suspension to allow the program to make adjustments to the classroom staffing and or environment, develop a new strategic plan for the child, or access additional community resources to support the child in the classroom environment.</p> <p>A temporary suspension can be a reduction in hours, reduction in days, or a break from the classroom.</p>

Mercer County Head Start Policies and Procedures

P/P Topic:	Request for Mental Health Consultant	P/P #:	
Part:	1302 Program Operations	PC Approval Date:	10/5/2023
Subpart:	A. <i>ERSEA</i>	Last Reviewed Date:	2/16/17
Section Title(s):	<i>Suspension & Expulsion</i>	Implementation Responsibility:	Teaching Staff, Family Advocates
Related Performance Standard(s):	1302.17(3), 1302.45(a)(1)	Monitoring Responsibility:	Early Childhood Services Director, MH Mgr

(A) Policy	<p>(3). Before a program determines whether a temporary suspension is necessary, a program must engage with a mental health consultant, collaborate with the parents, and utilize appropriate community resources – such as behavior coaches, psychologists, other appropriate specialists, or other resources as needed, to determine no other reasonable option is available.</p> <p>(1)To support a program-wide culture that promotes children’s mental health, social, and emotional well-being, and overall health, a program must:</p> <p>(1) Provide supports for effective classroom management and positive learning environments; supportive teacher practices; and strategies for supporting children with challenging behaviors and other social, emotional, and mental health concerns</p>
(B) Responsibility	Education Staff, PFCE staff, Early Childhood Services Director
(C) Procedure	<p><u>Process for Referral to Mental Health Consultant (before enrollment)</u></p> <p>During anytime prior to enrollment of a child (application, screening day, etc), a member of the administrative team may make a referral to the MHC for observation and services. This determination can be made based on information provided by the parent / guardian and / or other service providers, observation of the child’s skills. Any child placed on a modified schedule for any reason receives a referral to the MH Consultant.</p>

Process for Referral to Mental Health Consultant (after enrollment)

- *After a child has been in the program for 30 days , education staff will complete a DECA screen in the EDECA system.*

When children begin displaying behaviors of concern or who verbalize comments (threats to self or others) and cannot be redirected by typical classroom intervention strategies the following procedure will be followed:

1. Education staff will review child's ASQ-SE for any behavioral indicators shared by the parent
2. Discuss child's behavioral concerns with assigned Family Advocate (FA); inquiring as to possible mitigating factors in child's life that may be causing behaviors, case note.
3. To submit the referral for an individual observation, the teacher must enter the REFERRAL under the CHILD tab in COPA.
4. The referral reason, referred to, service area, and email notification to mental health consultant must be completed.
5. Once the MH Mgr receives the referral via email notification, the MHC will email the teacher to notify when the MHC will be observing in the classroom.
6. Prior to completing the individual observation, the MHC will speak with the teaching staff.
7. Based upon the MHC findings the process now begins the behavior plan process. Please see that policy.
8. The MHC is responsible to record notes and plans in the MENTAL HEALTH tab under CHILD in COPA.

Mercer County Head Start Policies and Procedures

P/P Topic:	Prohibition on Expulsion	P/P #:	
Part:	1302	PC Approval Date:	10/17/24
Subpart:	<i>A Eligibility, Recruitment, Selection, Enrollment, and Attendance</i>	Last Reviewed Date:	
Section Title(s):	Suspension and expulsion	Implementation Responsibility:	MH Consultant
Related Performance Standard(s):	1302.17(b)	Monitoring Responsibility:	MH Mgr

(A) Policy	<p>(b). Prohibition on expulsion.</p> <p>(1). A program cannot expel or un-enroll a child from Head Start because of a child's behavior</p> <p>(2). When a child exhibits persistent and serious behavioral concerns, a program must explore all possible steps and document all steps taken to address such problems, and facilitate the child's safe participation in the program. Such steps must include, at a minimum, engaging a mental health consultant, considering the appropriateness of providing appropriate services and supports under section 504 of the Rehabilitation Act of 1973 to ensure that the child who satisfies the definition of disability in 29 U.S.C. 705(9)(b) of the Rehabilitation Act is not excluded from the program on the basis of disability, and consulting with the parents and the child's teacher and:</p> <p>(i) If the child has an individualized family service plan (IFSP) or individualized education program (IEP), the program must consult with the agency responsible for the IFSP or IEP to ensure the child receives the needed support services; or,</p> <p>(ii). If the child does not have an IFSP or IEP, the program must collaborate, with parental consent, with the local agency responsible for implementing IDEA to determine the child's eligibility for services.</p> <p>(3). If, after a program has explored all possible steps and documented all steps taken as described in paragraph (b)(2) of this section, a program in consultation with the parents, the child's teacher, the agency responsible for implementing IDEA (if applicable) , and the mental health consultant , determines that the child's continued enrollment presents a continued serious safety threat to the child or other enrolled children and determines the</p>
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	<p>program is not the most appropriate placement for the child, the program must work with such entities to directly facilitate the transition of the child to a more appropriate placement.</p>
(B) Responsibility	<p>Education staff, family advocates</p>
(C) Procedure	<p><i>the <u>act of forcing someone, or being forced, to leave a school, organization, or country</u></i></p> <p>Refer to the temporary suspension policy and procedure.</p> <p>When all strategies to maintain the child in the classroom environment have been exhausted and the child continues to pose a safety threat to him / herself and or others (severe physical injuries / running away from the facility), the multi-disciplinary team including the parent and led by the Mental Health Consultant must determine the most appropriate placement for the child. The program will support the family in the transition to the next placement. This includes referring the child for additional screening and evaluations.</p>

Mercer County Head Start Policies and Procedures

P/P Topic:	Incentive – Retention	P/P #:	
Part:	45CFR 75.430(f)	PC Approval Date:	10/17/24
Subpart:		Last Reviewed Date:	11/16/23
Section Title(s):		Implementation Responsibility:	CFO
Related Performance Standard(s):	ACF-IM-HS-22-04	Monitoring Responsibility:	HS Director

(A) Policy	This Information Memorandum describes providing competitive financial incentives with existing grant funds as a short-term strategy to invest in the Head Start workforce and promote retention of current staff, as well as recruitment of new staff to fill vacant positions. This policy applies to Mercer County Head Start employees only.
(B) Responsibility	District Treasurer's Office
(C) Procedure	<p>High-retention workplaces tend to employ more engaged workers invested in the mission and vision of the program. Employee retention promotes the health and success of the program. Seasoned employees maintain and demonstrate institutional knowledge.</p> <p>While employee retention is important in all work environments, it is especially relevant and detrimental to the unique services Head Start staff / programs provide to enrolled children and families.</p> <p>For all Head Start employees who remain employed at the time this incentive is scheduled (hire date with Mercer County Head Start must be effective on or before 10/1/24) to be distributed, that employee shall receive a one-time payment in the amount of 6% of their budgeted salary (as of the approval of this policy) or \$1500 whichever amount is greater.</p> <p>*The incentive payment will be distributed on the scheduled 2nd payroll distribution November 2024.</p> <p>The MCHS employee must have been employed in FY 24 and remain employed at MCHS (at the time of distribution) to receive any retention incentive payments as scheduled. All pending or potential incentive payments will be forfeited by the employee upon termination, regardless of the reason(s) for separation of employment.</p> <p>This policy meets the definition of reasonableness per the IM</p>

	<p>narrative address workforce shortages and allowable per the IM directing grant recipients to utilize ARP, COVID related funds, and base grant funds.</p> <p>This policy will remain in effect provided grant funds are available.</p>
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Competitive Bonuses for the Head Start Workforce

 eclkc.ohs.acf.hhs.gov/policy/im/acf-im-hs-22-04

Competitive Bonuses for the Head Start Workforce ACF-IM-HS-22-04

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

1. **Log Number:** ACF-IM-HS-22-04
2. **Issuance Date:** 06/21/2022
3. **Originating Office:** Office of Head Start
4. **Key Words:** Head Start Workforce; Financial Incentives; Recruitment and Retention; Bonuses

Information Memorandum

To: All Head Start and Early Head Start Grant Recipients

Subject: Competitive Bonuses for the Head Start Workforce

Information:

Head Start staff are the backbone of our programs. Every day, staff work tirelessly to provide high-quality Head Start services to children and families. During very challenging times, Head Start staff have continued to ensure children and families have the support they need to thrive.

Adult wellness is vital in any workforce; particularly in Head Start programs where children and families in the most vulnerable circumstances are served. Providing comprehensive services through a whole family approach requires staff to be well-versed in the tenets of early childhood education and development. It also requires a level of clear-headedness and physical stamina that must be supported with a systemic approach. This approach should, at its core, value the important role of everyone in the Head Start workforce and recognize that they deserve appropriate compensation (i.e., wages and benefits) to fulfill their important charge. Indeed, a stable, qualified workforce is critical for programs to keep their classrooms open and maintain their funded enrollment. This cannot be accomplished if the workforce continues to be undervalued and undercompensated.

The Office of Head Start (OHS) recognizes that the dedication of Head Start staff is especially commendable given persistently low wages and lack of comprehensive benefits, particularly for education and family services staff. Permanent, sustainable wage increases require additional funding. This is often done by freeing up funds within existing budgets — a long-term program planning activity that often involves making difficult decisions — or through additional appropriations from Congress. In the meantime, OHS recognizes programs are seeking strategies to provide immediate relief to current staff, as well as ways to fill vacant positions as they begin to plan for the next program year.

This Information Memorandum (IM) describes providing competitive financial incentives with existing grant funds as a short-term strategy (45 CFR §75.430(f)) to invest in the Head Start workforce and promote retention of current staff, as well as recruitment of new staff to fill vacant positions. OHS strongly encourages all Head Start programs to use American Rescue Plan (ARP) funds, base grant operations funds, and other COVID-19 relief funds to offer competitive financial incentives to staff, such as retention and hiring bonuses, to help stabilize and support their workforce in the near term.¹ Please be mindful of any applicable grant requirements that must be met, including period of availability for different funding sources (e.g., March 31, 2023, for ARP funds).

OHS encourages programs, including those who have already offered such incentives, to reevaluate the monetary size of incentives that are necessary and reasonable to retain and recruit staff. These may be larger than previously considered. Below are strategies programs can use when determining and justifying the necessity and reasonableness for larger incentives. Programs are encouraged to apply these strategies for staff positions in their program that are impacted by the workforce shortage.

Competitive Financial Incentives

Challenges to maintaining a qualified workforce are not unique to Head Start programs. Employers in many industries are currently struggling to retain and hire staff. Financial incentives can be a powerful tool to promote retention and recruitment, particularly for positions that are difficult to fill or experiencing high turnover. Many employers are appealing to workers by offering financial incentives, such as retention and hiring bonuses. These incentives vary widely both in size and distribution schedule.

Head Start programs are competing with other employers, such as public schools, for qualified staff. OHS strongly encourages programs to offer financial incentives that are substantial enough to compete with incentives and overall compensation rates offered by competitor employers in their local job market, including elementary schools, while understanding that such financial incentives are not permanent wage increases. Programs may match or reasonably exceed offers made by competing employers, including elementary schools. The amount of such financial incentives may be larger than programs have offered in the past. As outlined in ACF-IM-HS-21-01, what is a reasonable cost during the ongoing COVID-19 pandemic and the heightened workforce needs likely looks different than what was reasonable during pre-pandemic times.

Justification for Financial Incentives: Determining Necessity and Reasonableness

When making data-informed programmatic decisions on financial incentives and determining necessity and reasonableness, programs can consider the following.

1. Competing employers can include public school settings.

- A program may consider bonuses and overall compensation rates being offered by local elementary school settings for positions that are comparable to the Head Start position for which the incentive is being provided (e.g., a Head Start preschool teacher provides comparable services to a kindergarten or first grade teacher).
- Programs may consider bonuses and compensation rates being offered in neighboring counties or school districts.

- These data points can be integrated into a program's wage comparability study as one key approach to using data to document workforce strengths and needs.
- 2. QHS strongly encourages programs to structure incentives in a way that rewards retention of existing staff.**
 - Think about scaling incentives based on employee tenure with the program.
 - Consider the implications of different incentive payment structures or schedules. For instance:
 - A single lump sum payment may be particularly impactful for Head Start staff who have an established tenure with the program.
 - QHS suggests programs stagger any hiring bonuses for new and prospective staff over time to promote retention, rather than providing one lump sum upon hire. For example, a hiring bonus may be advertised for a position posting as one large amount, with part of the bonus paid upon beginning employment with the program and subsequent portions dispersed in one or more increments at future points in time as the new employee remains in their position (e.g., six months after hire; one year after hire; etc.).
- 3. Programs should use data on the extent of their workforce shortage and program needs to demonstrate the necessity and reasonableness for competitive incentives.**
 - Relevant data can include the number of vacancies by type of position, how often vacancies occur, how long posted vacancies remain unfilled, the number of applicants, the number of applicants who are offered or attend interviews, the number of candidates accepting new positions, the length of time new hires remain employed in the program, and data from exit and stay surveys.
 - Programs can highlight how a staffing shortage prohibits them from reaching full in-person enrollment as a demonstration of necessity.
 - If a program already offers financial incentives and continues to struggle to maintain their workforce, this may be an indicator to increase incentive amounts to make them more competitive.
- 4. Any incentives for staff are subject to an established written policy of the grant recipient for allowability (45 CFR §75.430(f); 45 CFR §75.431; 45 CFR §1302.90(a)).** QHS reminds programs to update their written policies and procedures with governing board approval to reflect more competitive staff incentives prior to implementation.
- 5. Financial incentives may complement, but should not replace, intentional workforce planning practices.** Financial incentives, particularly those that use ARP funds, are a short-term strategy to recruit and retain staff. Programs should continue to use intentional workforce planning practices to build and sustain a stable workforce.

QHS recognizes that the availability and size of any financial incentives will depend on many local factors, including cost of living and the local job market. Programs should contact their Regional Office with any questions about this **IM** and providing financial incentives.

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

/ Katie Hamm /

Katie Hamm
Acting Director, Office of Head Start
Deputy Assistant Secretary for Early Childhood Development

See Attachments:

[Examples of Competitive Financial Incentives for Staff](#)

See PDF Version of Information Memorandum:

[Competitive Bonuses for the Head Start Workforce](#) (104.3 KB)

¹ Since monetary bonuses likely count as income, grant recipients should understand income requirements for public benefits to determine how such bonuses may impact staff members' access to these benefits.

Historical Document

Additional Filtering

Currently Enrolled ▼

Filter

View All

Mercer County Head Start ▼

All Sites ▼

All Classes ▼

Agency: All

Currently Enrolled= 118

406 - EPSDT status Report

	Up-To-Date	Not Up-To-Date
Anemia (HCT/HGB) (Mandated)	67	51
Blood Pressure (Mandated)	87	31
Dental	62	56
Growth (Mandated)	100	18
Hearing (Mandated)	99	19
Lead Screening (Mandated)	82	36
Physical (Mandated)	110	8
Vision (Mandated)	98	20

Up-to-Date / Not Up-to-Date on ALL Mandated Exams

Up-To-Date	Not Up-To-Date
52	66

Notes:

- 1- Numbers do not include unborn children
- 2- For Currently Terminated children, Up To Date status is calculated based on Termination Date (instead of Today's date). These children are marked with a RED asterisk in sub-reports.
- 3- If Class End Date is prior to Today's date, Up To Date status is calculated based on Class End Date (instead of Today's date). These children are marked with two RED asterisks in sub-reports.

