Head Start Annual Training
Tuesday, October 8, 2024 5:00 PM

Dr. Matthew Prophet Education Center - Board Auditorium
501 N. Dixon St
Portland, OR 97227

Agenda

1. Head Start Annual Training

PPS Early Learners Update & Head Start Annual Training

PORTLAND
Public Schools

October 8. 2024

Presentation Overview

AGENDA

I. Early Learners/PreK Program Overview
   A. Updates & Reorganization
   B. Program Overview
   C. Funding Overview
   D. Enrollment Updates

II. Head Start Board Training
   A. Governance Structures
   B. Roles & Responsibilities
   C. Modes of Communication
   D. Continuous Improvement

PRESENTERS

- **Kristina Howard**, Chief Academic Officer
- **Dr. Emily Glasgow,** Sr Director PreK-5 Academics
- **Dana Stiles,** Director, Early Learners

Early Learners Preservice 2024- All Staff

Early Learners PreK Program Overview

PPS Early Learners

What's New in SY24–25?

In response to:

- Significant budget constraints,
- Enrollment challenges,
- Ongoing learning about strategies for aligning program supports and services

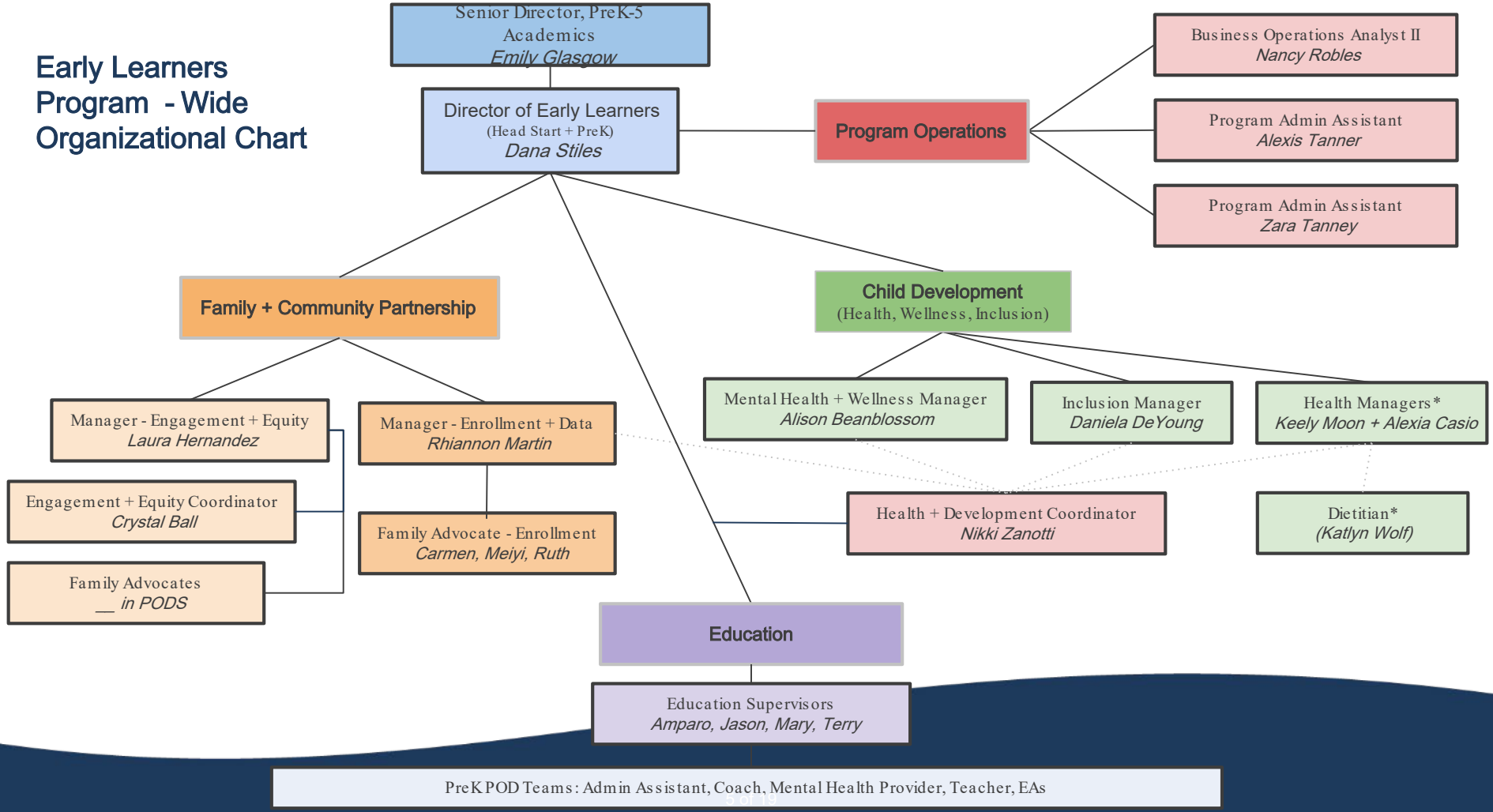
We reorganized with this central question in mind:

How do we effectively and efficiently maximize PreK access to the same number of PPS students/families with reduced programmatic resources?

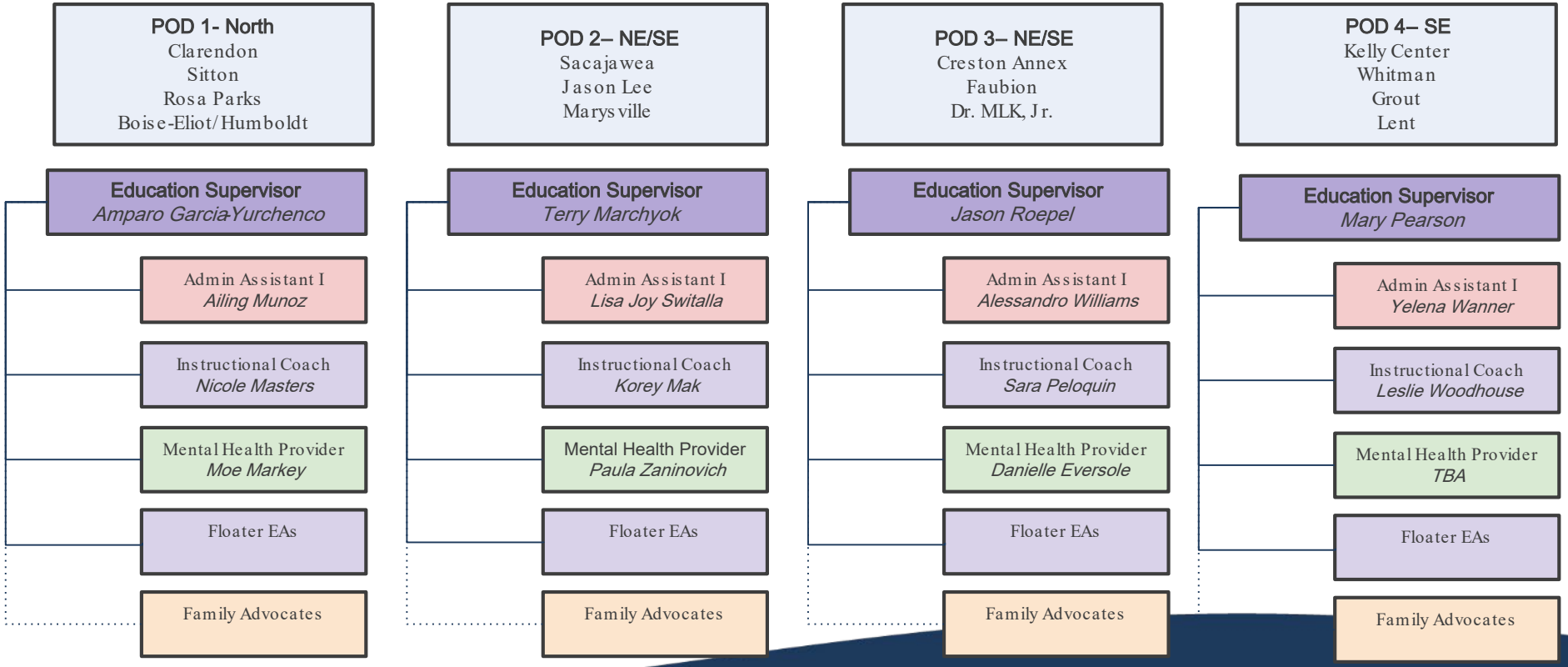
Summary of Program Shifts:

- One Early Learners program team managing and supporting all PPS PreK classrooms;
- One year-round coordinated enrollment process;
- Braided funding @ most sites;
- Consolidation of sites without decrease in "seats";
- Reduction of $2.5 million without decrease in "seats" or services

Early Learners Program - Wide Organizational Chart



PreK POD Support Teams– Organizational Chart



PPS PreK Programs: By the Numbers

Classrooms:

- 51 PPS PreK classrooms @ 14 sites
- 7 DLI PreK classrooms (including new Vietnamese DLI program!)
- 2 Native culture classrooms & 1 emerging Black Excellence classroom
- 1 licensed PAT teacher and 1.5 classified PFSP EAs/classroom
- 1 Early Learner Admin & Pod Support team assigned to each classroom
- *Note: PPS also provides over a dozen classroom spaces for partner PreK providers*

Students:

- PPS PreK students are 3-5 yrs old
- Capacity to serve 910 students

Data from SY23-24:

- 22% have disabilities
- 14% have experienced homelessness
- 43% are Multilingual Learners
- 71% are students of color
- 100% meet eligibility criteria for free, full-day PreK experiences

Priorities for SY24–25

Priority 1: Instructional Equity through Literacy	Priority 2: Equity through Inclusive Environments
Implement evidence-based core literacy instruction to improve educational outcomes for **black and native students**. Engage families in meaningful literacy practices that enhance school-based learning and multilingualism.	Create a sense of belonging for children and families in all areas of the program. Implement culturally responsive practices that hold consistently high expectations for every student accompanied by responsive support.

PreK FUNDING

PPS PreK classrooms student slots – are entirely grant-funded. This funding comes from federal, state, county, and state sources.

HEAD START

PRESCHOOL PROMISE

PRESCHOOL FOR ALL

PRESCHOOL FOR ALL MULTNOMAH COUNTY

portland children's levy

PPS PORTLAND PUBLIC SCHOOLS

Head Start eligibility requirements:

- Less than 100% of federal poverty.
- Currently experiencing homelessness
- Children who are in foster care
- Receiving Temporary Assistance for Needy Families (TANF)
- Receiving Social Security Income (SSI) benefits
- Receiving Supplemental Nutrition Assistance Program (SNAP) benefits
- Up to 10% allowed >130% FPL

Preschool Promise eligibility requirements:

- Oregon families who are living at or below 200% of the federal poverty level

Preschool For All priority populations (70% required):

- Black, Brown, Native American Indigenous, and all Children of Color;
- Children who speak languages other than English;
- Children with developmental delays and disabilities;
- Children living in or at risk of placement in foster care;
- Children from families experiencing low incomes;
- Children experiencing homelessness.

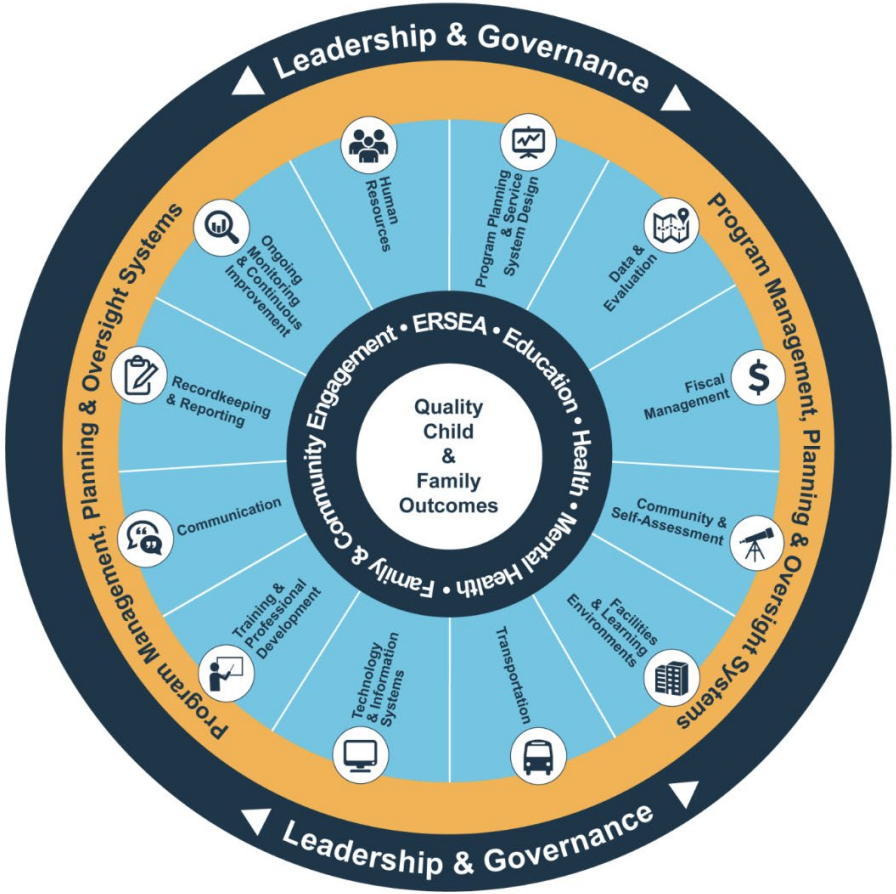
Enrollment Update

September 2024			
Funding	**Total Slots**	**Enrolled**	**Percentage**
Head Start	648	473	73%
PSP/PFA	262	219	84%
Totals	**910**	**692**	**76%**

Head Start Board Training

Management Systems Wheel

The Head Start Management Systems Wheel is a visual representation of the 12 program management, planning, and oversight systems that are critical to high-quality service delivery.



PPS Head Start Leadership and Governance

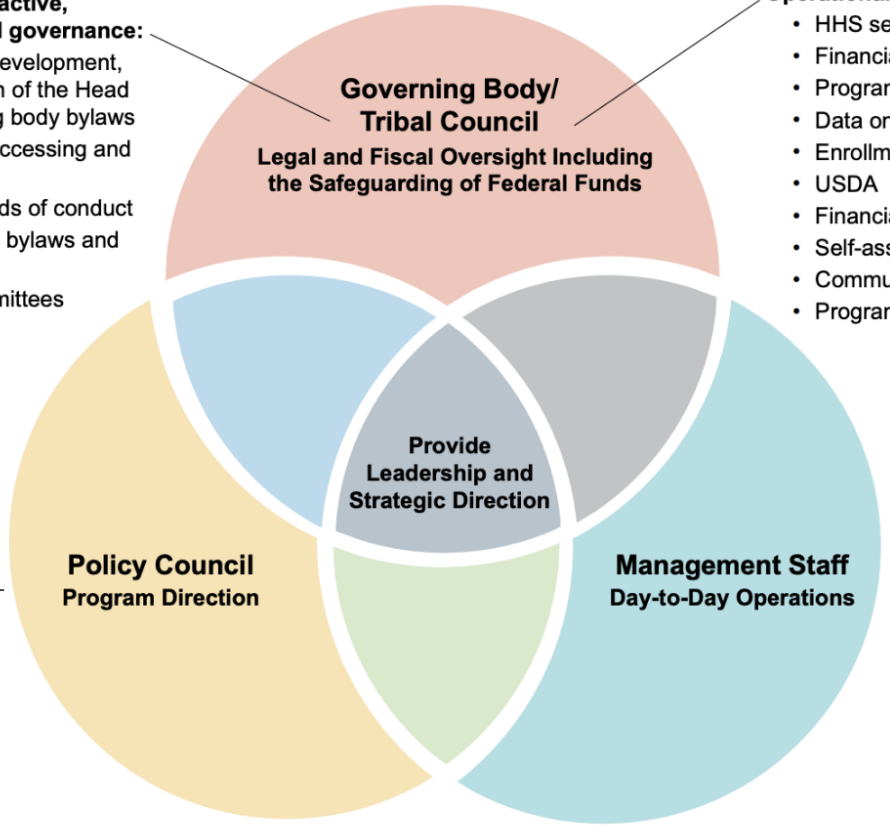
PPS School Board

Adopt practices to ensure active, independent, and informed governance:

- Fully participate in the development, planning, and evaluation of the Head Start program governing body bylaws
- Create procedures for accessing and collecting information
- Develop written standards of conduct
- Establish Policy Council bylaws and election procedures
- Establish advisory committees as deemed necessary

Operational Reports:

- HHS secretary communication
- Financial statement
- Program information summaries
- Data on school readiness goals
- Enrollment
- USDA
- Financial audit
- Self-assessment
- Community assessment
- Program Information Report (PIR)



PPS Parent Policy Council

PPS Early Learners Department

Supplemental Document A & B

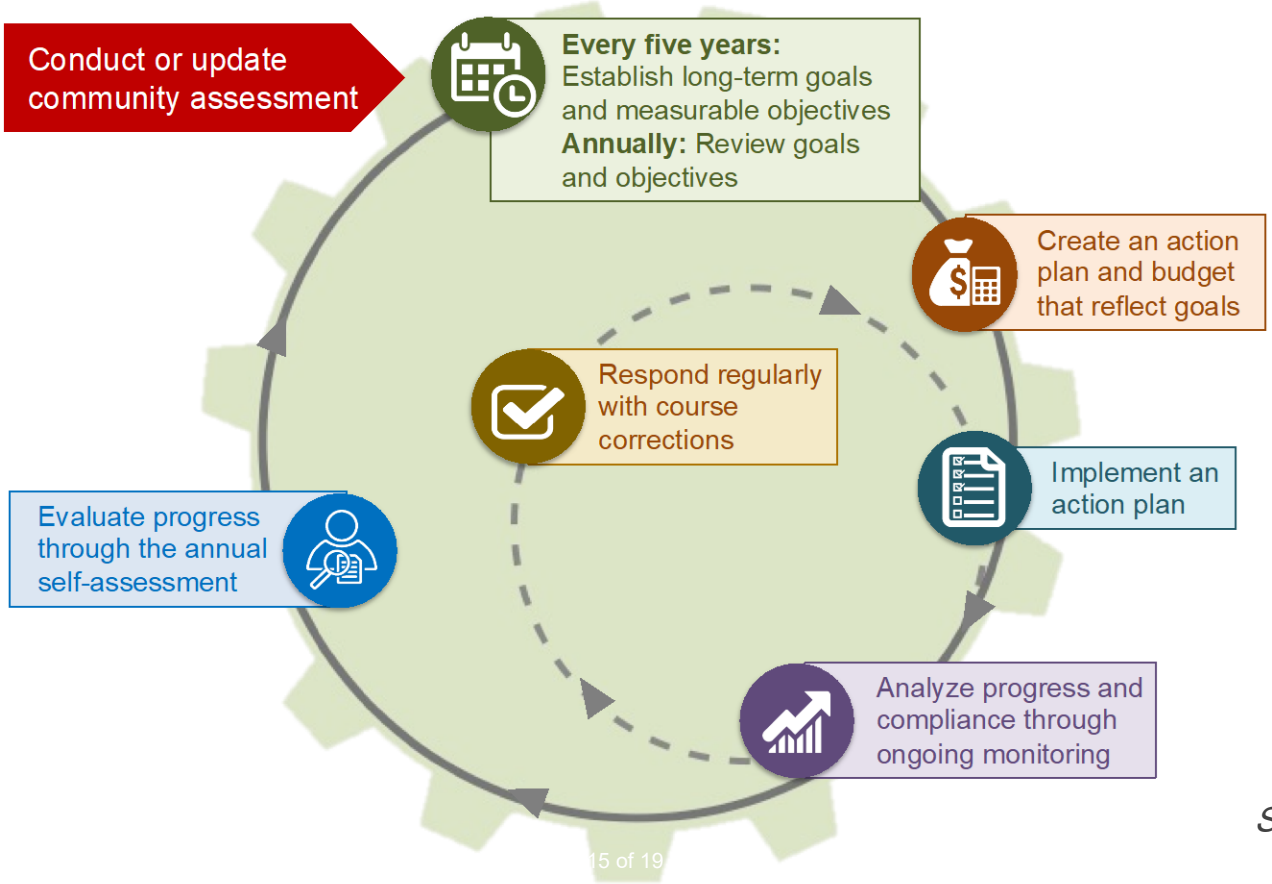
Governance Roles & Responsibilities

PPS Early Learners Management Team	PPS Parent Policy Council	PPS School Board
Management staff lead the day -to-day of the program. Operating activities and reports informs the decision-making activities of the Policy Council and Governing Body.	Policy Council is established yearly. Parents participate in policy making and in other decisions about the program. They offer parent feedback and advocacy.	The Board is fiscally and legally accountable for overseeing the program including: general responsibility for guiding, directing, planning, general procedures, and human resources. The Board has legal and fiduciary responsibility for the program that includes responsibility for program compliance and effectiveness.

These three entities of Head Start leadership collaborate
to support grantees on their five -year journeys, particularly around program improvement and planning.

Supplemental Document C

Program Planning for Continuous Improvement



Supplemental Document D

Modes of Communication

Automated HSES System:

Automated program updates and findings from the Office of Head Start – will always include Board Chair, Executive Director, Director, etc.

Quarterly Board Packets (consent agenda):

A packet including a Director's Update, Policy Council minutes, enrollment & demographic update, financial update, description of new policies – items will be noted for review or approval.

Supplemental Communication:

Additional communications as needed to share health & safety incident reports, upcoming audit information, Board requests, etc. – will come through the Board office.

Upcoming Focus Area 1 Review

Focus Area One Review (happening in SY24 -25)

Focus Area One (FA1) is conducted virtually by the Office of Head Start (OHS).

Through interviews, grant recipients share information they use to inform the following topics:

- Strengths and needs of children and families in the community
- Staffing structure and program design that meets the needs of children and families
- Approaches to education and child development, health, and family and community engagement services
- Fiscal infrastructure and capacity
- Program governance and accountability
- Eligibility, recruitment, selection, enrollment, and attendance (ERSEA) processes

Board member interviews will be conducted as a component of this review.
The Early Learners Department will support preparation for these interviews.

Supplemental Documents

A. Head Start Program Governance Reference Book
B. PPS Governing Body Policy
C. Head Start Leadership and Governance Key Activities
D. Head Start Program Planning Cycle
E. Head Start Governance FAQs

Supplemental Document E

Head Start Leadership and Governance Key Activities

Activity	Management Team	Policy Council/Committee	Governing Body/Tribal Council
		Policies and Procedures	
Developing Bylaws	• Draft governing body/Tribal Council and Policy Council bylaws and amendments	• Submit decisions regarding Policy Council bylaws to governing body/Tribal Council	• Adopt bylaws and amendments for governing body/Tribal Council and Policy Council

Developing Governance Structure	• Draft policies and procedures for consideration by Policy Council and governing body/Tribal Council
	• Oversee the implementation of approved policies and procedures
	• Provide training to governing body/Tribal Council and Policy Council
	• Focus on continuous quality improvement
	• Oversee management and protection of program data
	• Maintain automated accounting and recordkeeping system
	• Monitor goals, objectives, and regulatory compliance
	• Establish and manage parent committees to:
	  ○ Advise staff on parent engagement activities
	  ○ Communicate with Policy Council/Committee
	  ○ Participate in the recruitment and screening of Head Start employees
		• Approve and submit to the governing body/Tribal Council decisions regarding:
		  ○ Activities to actively involve parents and ensure responsive services
		  ○ Recruitment, selection, and enrollment priorities
		  ○ Funding applications and amendments
		  ○ Budget planning, including policies supporting Policy Council activities
		  ○ Policy Council bylaws and election procedures
		  ○ Head Start program personnel policies and decisions, including criteria for employment and dismissal of program staff
		  ○ Recommendations on delegates and service areas
			• Select delegate agencies and service areas
			• Establish procedures and criteria for recruitment, selection, and enrollment
			• Review results and follow-up from federal monitoring
			• Review and approve:
			  ○ Funding applications and amendments
			  ○ Major policies and procedures, including self-assessment and financial audit
			  ○ Progress on implementing the Head Start grant, including corrective actions
			  ○ Personnel policies regarding the hiring, evaluation, termination, and compensation of agency employees, including the Head Start director and management team
			  ○ Financial management, accounting, and reporting policies

Developing Governance Structure			○ Major expenditures and operating budget ○ Selection of an auditor and actions to correct audit findings • Adopt: ○ Procedures for accessing and collecting information ○ Standards of conduct, including conflicts of interest and complaints ○ Procedures for selecting Policy Council members ○ Procedures for utilizing advisory committees
Providing Leadership and Strategic Direction	• Outline planning process and protocols for planning committee, including staffing considerations • Review key reports and recommend program and school readiness plans • Prepare goals and objectives • Use program plans to support reporting, ongoing monitoring, and self-assessment • Outline required adjustments to goals and objectives	• Work with staff to select planning committee with focus on parent engagement • Review recommendations for planning committee • Approve goals and objectives • Respond to progress reports • Use data for ongoing oversight and correction • Approve adjusted goals and objectives	• Work with management staff to select planning committee, including governing body/Tribal Council representation • Review recommendations for planning committee • Ratify goals and objectives • Respond to progress reports • Use data for ongoing oversight and correction • Ratify adjusted goals and objectives

Monitoring Program Performance	• Generate reports to monitor compliance and goal attainment that include:
	  ○ U.S. Department of Health and Human Services (HHS) secretary communication
	  ○ Financial statements
	  ○ Program information summaries
	  ○ Ongoing monitoring results
	  ○ Data on school readiness
	  ○ Enrollment
	  ○ U.S. Department of Agriculture (USDA) nutrition reports
	  ○ Financial audit
	  ○ Self-assessment
	  ○ Community assessment
	  ○ Program Information Report (PIR)
		• Review related reports
		• Use data for ongoing oversight, correction, and self-assessment
			• Review related reports
			• Use data for ongoing oversight, correction, and self-assessment

Ensuring Consensus	• Develop procedures with governing body/Tribal Council and Policy Council and facilitate selection of mediator and arbitrator	• Jointly establish written procedures for resolving internal disputes between governing body/Tribal Council and Policy Council in a timely manner that include impasse procedures. These procedures:
		  ○ Demonstrate the governing body/Tribal Council considers proposed decisions from the Policy Council and vice versa
		  ○ Require the governing body/Tribal Council and the Policy Council to notify the other in writing why it does not accept a decision
		  ○ Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal
		• If the agency's decision-making process does not result in a resolution and an impasse continues, governing body/Tribal Council and Policy Council must select a mutually agreeable third-party mediator and participate in a formal process of mediation that leads to a resolution of the dispute
		• If no resolution is reached with a mediator, governing body and Policy Council must select a mutually agreeable arbitrator whose decision is final. This does not apply to American Indian and Alaska Native (AIAN) programs	

Flow of reports

PORTLAND PUBLIC SCHOOLS
Head Start

Governing body

Head Start Performance Standard

§ **1301.2**

(a) Composition. The composition of a governing body must be in accordance with the requirements specified at section 642(c)(1)(B) of the Act, except where specific exceptions are authorized in the case of public entities at section 642(c)(1)(D) of the Act. Agencies must ensure members of the governing body do not have a conflict of interest, pursuant to section 642(c)(1)(C) of the Act.

(b) Duties and responsibilities.

(1) The governing body is responsible for activities specified at section 642(c)(1)(E) of the Act.

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

(c) Advisory committees.

(1) A governing body may establish advisory committees as it deems necessary for effective governance and improvement of the program.

(2) If a governing body establishes an advisory committee to oversee key responsibilities related to program governance, it must:

(i) Establish the structure, communication, and oversight in such a way that the governing body continues to maintain its legal and fiscal responsibility for the Head Start agency; and,

(ii) Notify the responsible HHS official of its intent to establish such an advisory committee.

Preschool Promise Grant Requirement

Preschool For All Grant Requirement

Parent Advisory

Policy

(a) Composition.

PPS Governing Board are the elected PPS School Board members who are voted upon by registered voters of those residing within the school district boundaries.

(b) Duties and responsibilities.

(1) The Governing Board ensures compliance with Federal laws and regulations.

- The Governing Board is trained annually and understands the role of parents and the Policy Council in Head Start-shared governance and procedures of the Policy Council.
- The Board is fiscally and legally accountable for overseeing the program including: general responsibility for guiding, directing, planning, general procedures and human resources.

(2) Governing Board members review and have input into developing and analyzing program including:

- Program 5 Year goals
- Annual Self-Assessment
- School Readiness Goals

- Budget/Grants
- Program Options
- ERSEA

(c) Advisory committees.

(1) The Governing Body (School Board) has established departments to oversee the district. The departments will serve as the advisory committee reporting directly to the superintendent who reports to the Governing Body.

(2)

Advisory committee components: **Oversee key responsibilities related to program governance**	**Evidence/** **Documentation**
Dept. of HR — Oversight of all systems related to personnel including hiring/firing, development of contracts, monitoring HR policies approved by the Governing Board.	Evaluations, Consultant, Contracts, Personnel File
Dept. of Grant Accounting — Oversight of systems related to grant accounting annual budget. Responsible for monitoring oversight of the budget according to individual grant standards.	Credit Card summaries, Accounting Policies and Procedures
Dept. of Procurement Services — Oversight of systems related to purchasing, credit card, contracts and consultants. Responsible for monitoring according to policies approved by the Governing Board.	Board Procedures and policies
Dept. of Legal Counsel — Oversight of all legal issues related to PPS district to ensure legal compliance related in all areas of the system.	Board Procedures and policies
Dept. of Facilities — Oversight of all schools/facilities located within the district. Responsible for daily custodial services as well as facility maintenance and renovation.	Work orders, Maintenance Log, Contracts
Dept. of Security Services — Oversight of all systems related to the safety of children. Including background checks, fingerprinting and building security.	Background Checks, Clearance to work
Office of Teaching and Learning — Oversight and development of appropriate curriculum to ensure the success of children entering the school system.	Adopted Curriculum, Instruction Specialist schedule

The Performance Standards have been updated. Resources may not yet reflect these changes.

Head Start Program Governance: Frequently Asked Questions (FAQs)

Head Start leaders who implement strong governance systems often face important questions. When such questions arise, leaders should refer first to key H regulation. These items include the Head Start Act, Head Start Program Performance Standards (HSPPS), Program Instructions (PIs), and Information Mem resources will help to determine if Head Start regulations and policies already exist to address the issues at hand.

FAQs Pertaining to the Governing Body

- What is the required composition of a Head Start governing body or Tribal Council?
- The Head Start Act specifies that certain members of the governing body or Tribal Council have "a background and expertise" in particular areas. Is there that more clearly defines "a background and expertise?"
- Can a staff member of a Head Start agency serve as a member of the governing body?
- Can a staff member serve as a consultant to the governing body?
- Do the public entity governing body membership exceptions apply to Indian tribes?
- Can governing body or Tribal Council members be compensated for serving on the governing body or for providing services to the Head Start agency?
- What exceptions are allowed for governing body or Tribal Council member compensation?
- Can consultants be compensated for providing services to the governing body or Tribal Council or for providing services to the Head Start agency?
- How can the governing body or Tribal Council use advisory committees to support its responsibilities relative to the Head Start program?
- What constitutes a conflict of interest for governing body or Tribal Council members?
- How should a Head Start agency address conflict of interest situations involving governing body or Tribal Council members?

FAQs Pertaining to the Policy Council

- What are the selection and election requirements for members of the Policy Council?
- How are procedures determined for selecting and electing Policy Council members?
- What constitutes a conflict of interest for Policy Council members?
- Can Head Start parents who are also staff serve on policy groups as voters?
- How long after the beginning of an operational year does a grantee or delegate agency have to establish a Policy Council or committee?
- How can a new grantee or delegate agency without an official Policy Council move forward with hiring staff?
- What are the differences between a Policy Council, Policy Committee, Policy Group, and Parent Committee?
- What are the term limits for members of a Head Start Policy Council and Committee, and why are there limits?
- Can low-income members of a Policy Council, Policy Committee, or Parent Committee be reimbursed for travel, meals, and child care expenses that aris responsibilities?
- What is the Policy Council's role in personnel decisions?
- If a grandparent is a primary caregiver, can he or she serve on Policy Council?
- How should Policy Council parents be included in the planning process of the local Head Start program?
- What does a program do when there is conflict between the governing body or Tribal Council and Policy Council?
- Can parents be required to participate or volunteer in Head Start?

FAQs Pertaining to the Governing Body and Policy Council

- Is there a regulation that pertains to the training and technical assistance that must be provided to the Policy Council/Committee and governing body or T
- Can members of the governing body or Tribal Council and the Policy Council be reimbursed for child care or mileage expenses for attending board and c

Read more:

Leadership and Governance, Organizational Leadership

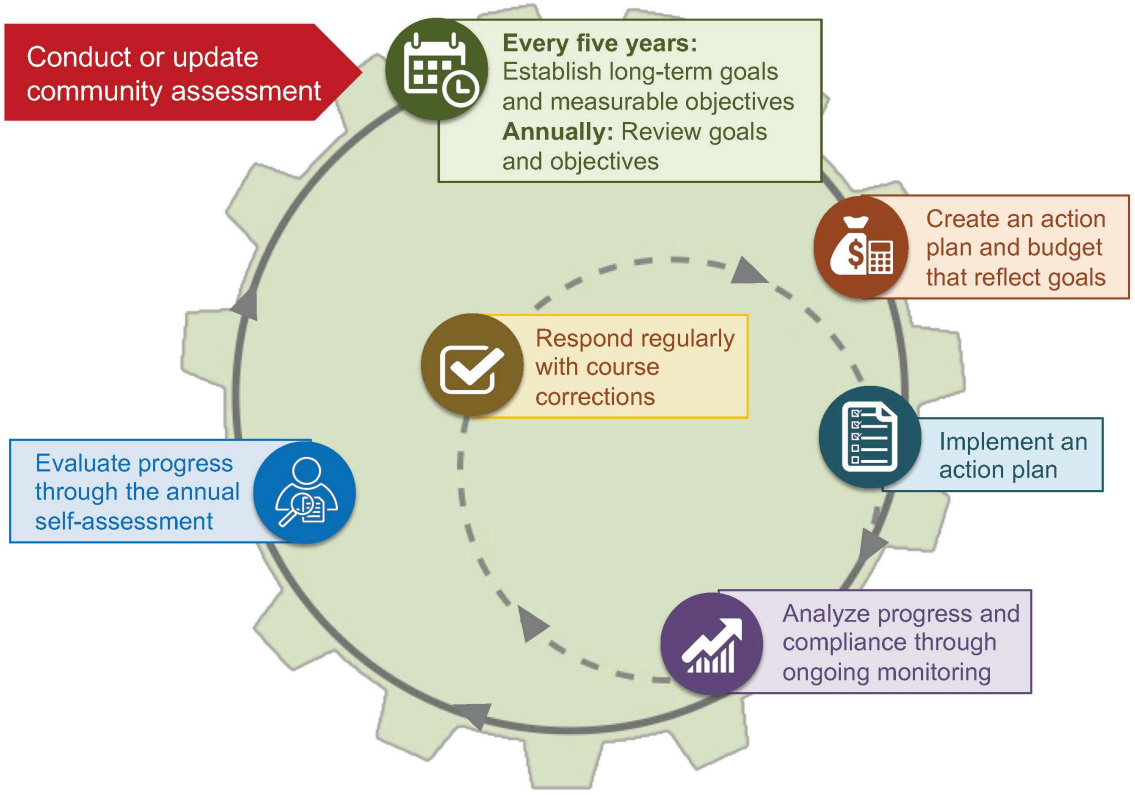
Last Updated: October 25, 2023

Program Planning in Head Start: The Program Planning Cycle

Thoughtful planning is key to successful programming and to the achievement of desired outcomes. The Head Start Program Planning Cycle outlines how the required Head Start management systems are interrelated parts of a predictable planning process. Through this process, programs develop goals, objectives, and expected outcomes. They monitor and evaluate progress toward their program goals, which include school readiness goals. In this document, references to long-term goals are inclusive of all program goals. Programs also ensure compliance with the Head Start Program Performance Standards (HSPPS).

The Program Planning Cycle depicts an ongoing sequence of planning, implementation, and evaluation. It promotes continuous quality improvement and allows programs to work toward the achievement of positive outcomes for children and families. Many of the steps happen repeatedly throughout the cycle, and the cycle itself is repeated throughout the five-year project period.

The Program Planning Cycle



To learn more about the process, follow the arrows clockwise around the planning cycle. Review a list of the steps and a brief description of each below.

1. Begin with either **community assessment** or **self-assessment** (see red arrow above).
    - **New programs** begin with a community assessment. They collect and analyze data about the needs and resources of eligible families, the program, and the community within the service area to inform the goal-setting process.
    - **Existing programs** may begin the process with self-assessment. They take a fresh look at updated community assessment, ongoing monitoring, and other relevant data to make recommendations for program planning and goal-setting.
2. For their baseline grant applications, programs identify the long-term goals they will accomplish during the **five-year project period**. They also identify initial specific, measurable, attainable, relevant, and timely (SMART) **objectives** linked to **expected outcomes**. During their **annual** planning process, programs review their long-term goals and objectives, along with community assessment and self-assessment data, and make any necessary programming adjustments. They continue to break down their goals into measurable objectives linked to expected outcomes.
3. Programs develop an annual **action plan,** which is a defined set of steps outlining what a program will do to accomplish its goals and objectives. The action plan is supported by a budget that is aligned with the goals and objectives. Through the **data and evaluation system**, the program decides which data will be collected to measure progress and determine impact.
4. While **implementing its plan**, the program collects data through its **technology and information systems** and manages it through its **recordkeeping and reporting system**.
5. The program continually evaluates progress toward its goals and objectives and compliance with the HSPPS by reviewing data gathered through the system of **ongoing monitoring and continuous improvement.** Effective ongoing monitoring enables programs to track progress toward their goals and objectives, ensure compliance, and collect data to inform continuous improvement.

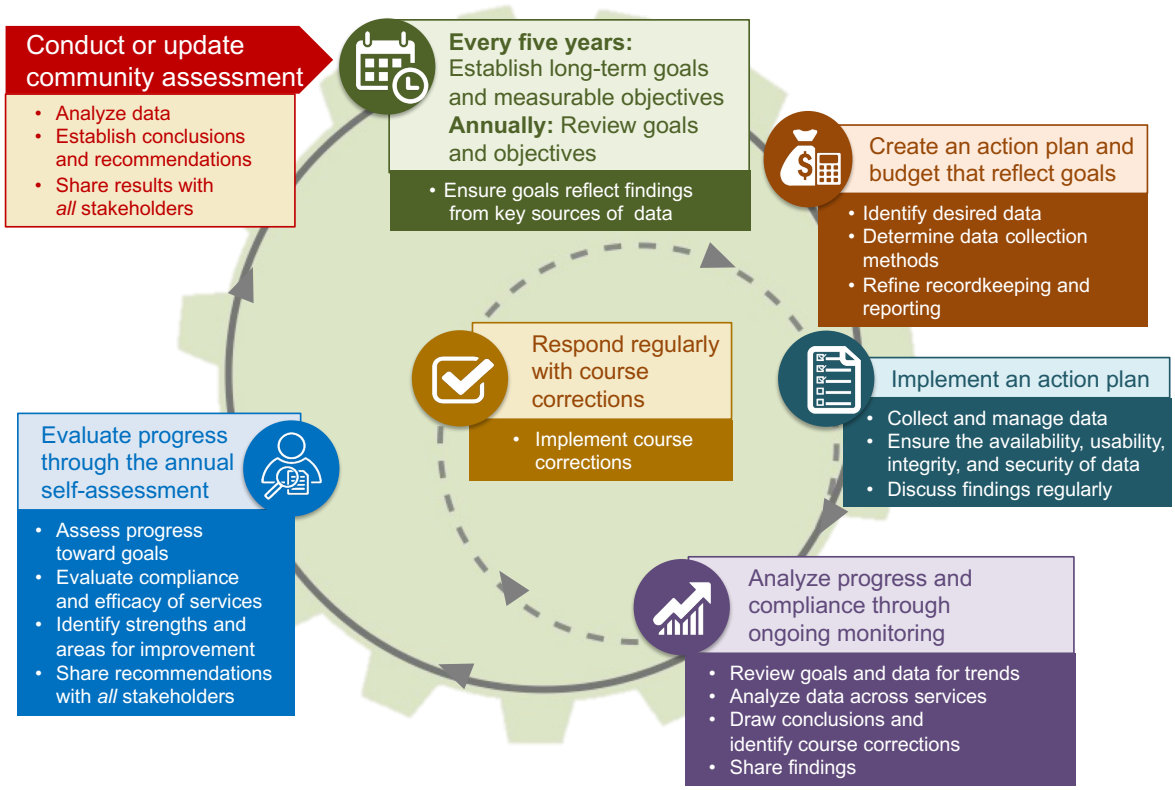
6. Based on ongoing monitoring results, programs may continue to implement their **action plan** as written, change the plan to **replicate best practices**, or make **course corrections** that may require changes in program activities or levels of effort. Following up to determine the efficacy of the course corrections is critical.

7. Finally, the program comes full circle to the annual **self-assessment**. In this step, the self-assessment team uses its ongoing monitoring, community assessment, and other relevant data (e.g., child assessment, professional development, and family engagement data, as appropriate) to assess the program's progress in achieving its goals, objectives, and expected outcomes. The team also evaluates the program's compliance with federal requirements.

Two more elements are essential throughout the planning process:

- Effective use of data that support a coordinated approach to service delivery
- Communication with appropriate stakeholders at each step

Integrating Data into Program Planning Systems



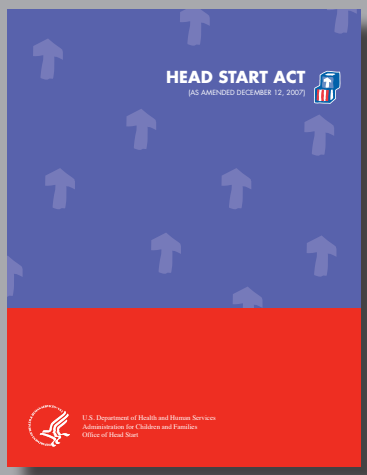
The Integrating Data into Planning Systems graphic above shows how the use of data is integrated into each step of the planning cycle. Below is a list of the steps in the planning cycle, along with the data activities that occur at each step.

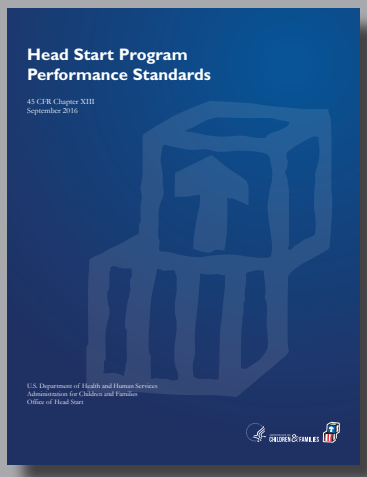
- **Evaluate progress through the annual self-assessment (new programs begin with community assessment)**
  - Assess annual progress toward goals and objectives
  - Evaluate compliance and the efficacy of services
  - Identify strengths and areas for improvement
  - Share recommendations with all stakeholders
- **Conduct or update community assessment**
  - Analyze data
  - Establish conclusions and programming recommendations
  - Share results with all stakeholders
- **Every five years: Establish long-term goals and measurable objectives**
- **Annually: Review goals and objectives**
  - Ensure goals reflect conclusions from key data sources (e.g., community assessment, self-assessment, child outcomes, professional development, and family engagement data)
- **Create an action plan and budget that reflect goals**
  - Identify desired data
  - Determine data-collection methodologies
  - Refine recordkeeping and reporting systems
- **Implement an action plan**
  - Collect and manage data
  - Ensure the availability, usability, integrity, and security of data
  - Discuss findings regularly
- **Analyze progress and compliance through ongoing monitoring**
  - Review goals and data for trends
  - Analyze data across services
  - Draw conclusions and identify course corrections
  - Share findings with internal stakeholders

- **Respond regularly with course corrections, as required**
  - Implement course corrections
  - Review corrections to monitor the efficacy of the change
  - Communicate data findings and next steps to internal stakeholders

Head Start Program Governance

Reference Book





Early Childhood National Centers

NATIONAL CENTER ON
Program Management and Fiscal Operations

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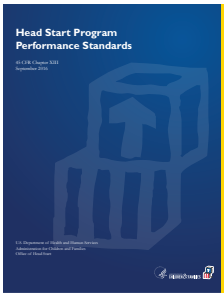

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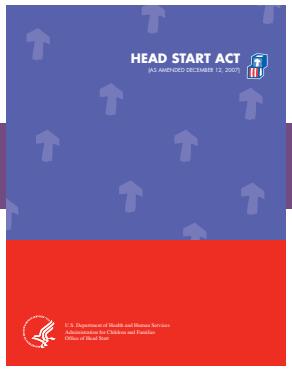
HEAD START ACT



Governing Body Sec. 642 (c)(1)

(c) Program Governance – Upon receiving designation as a Head Start agency, the agency shall establish and maintain a formal structure for program governance, for the oversight of quality services for Head Start children and families and for making decisions related to program design and implementation. Such structure shall include the following:

(1) GOVERNING BODY –

(A) In General – The governing body shall have legal and fiscal responsibility for the Head Start agency.

(B) Composition – The governing body shall be composed as follows:

(i) Not less than 1 member shall have a background and expertise in fiscal management or accounting.

(ii) Not less than 1 member shall have a background and expertise in early childhood education and development.

(iii) Not less than 1 member shall be a licensed attorney familiar with issues that come before the governing body.

(iv) Additional members shall—

(I) reflect the community to be served and include parents of children who are currently, or were formerly, enrolled in Head Start programs; and

(II) are selected for their expertise in education, business administration, or community affairs.

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

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

(C) Conflict of Interest – Members of the governing body shall:

(i) not have a financial conflict of interest with the Head Start agency (including any delegate agency);

(ii) not receive compensation for serving on the governing body or for providing services to the Head Start agency;

(iii) not be employed, nor shall members of their immediate family be employed, by the Head Start agency (including any delegate agency); and

(iv) operate as an entity independent of staff employed by the Head Start agency.

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

(i) such individual shall not be prohibited from serving on such body and the Head Start agency shall report such conflict to the Secretary; and

(ii) if the position held as a result of public election or political appointment provides compensation, such individual shall not be prohibited from receiving such compensation.

(E) Responsibilities – The governing body shall—

(i) have legal and fiscal responsibility for administering and overseeing programs under this subchapter, including the safeguarding of federal funds;

(ii) adopt practices that assure active, independent, and informed governance of the Head Start agency, including practices consistent with subsection (d)(1), and fully participate in the development, planning and evaluation of the Head Start programs involved;

(iii) be responsible for ensuring compliance with Federal laws (including regulations) and applicable state, tribal and local laws (including regulations); and

(iv) be responsible for other activities, including—

(I) selecting delegate agencies and the service areas for such agencies;

(II) establishing procedures and criteria for recruitment, selection, and enrollment of children;

(III) reviewing applications for funding and amendments to applications for funding for programs under this subchapter;

(IV) establishing procedures and guidelines for accessing and collecting information described in subsection (d)(2);

(V) reviewing and approving all major policies of the agency, including—

(aa) the annual self assessment and financial audit;

(bb) such agency's progress in carrying out the programmatic and fiscal provisions in such agency's grant application, including implementation of corrective actions; and

(cc) personnel policies of such agencies regarding the hiring, evaluation, termination, and compensation of agency employees;

(VI) developing procedures for how members of the policy council are selected, consistent with paragraph(2)(B);

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

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

(bb) annual approval of the operating budget;

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

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

(VIII) reviewing results from monitoring conducted under section 641A(c) including appropriate follow-up activities;

(IX) approving personnel policies and procedures, including policies and procedures regarding the hiring, evaluation and compensation, and termination of the Executive Director, Head Start Director, Director of Human Resources, Chief Fiscal Officer, and any other person in an equivalent position with the agency;

(X) establishing, adopting, and periodically updating written standards of conduct that establish standards and formal procedures for disclosing, addressing, and resolving—

- **(aa)** any conflict of interest, and any appearance of conflict of interest, by members of the governing body, officers and employees of the Head Start agency, and consultants and agents who provide services or furnish goods to the Head Start agency; and
- **(bb)** complaints, including investigations, when appropriate; and

(XI) to the extent practicable and appropriate at the discretions of the governing body, establishing advisory committees to oversee key responsibilities related to program governance and improvement of the Head Start program involved.

Policy Council Sec. 642 (c)(2)

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

(B) Composition and Selection –

(i) The policy council shall be elected by the parents of children who are currently enrolled in the Head Start program of the Head Start agency.

(ii) The policy council shall be composed of –

(I) parents of children who are currently enrolled in the Head Start program of the Head Start agency (including any delegate agency), who shall constitute a majority of the members of the policy council; and

(II) members at large of the community served by the Head Start agency (including any delegate agency), who may include parents of children who were formerly enrolled in the Head Start program of the agency.

(C) Conflict of Interest – Members of the policy council shall –

(i) not have a conflict of interest with the Head Start agency (including any delegate agency); and

(ii) not receive compensation for serving on the policy council or for providing services to the Head Start agency.

(D) Responsibilities – The policy council shall approve and submit to the governing body decisions about each of the following activities:

(i) Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start agency is responsive to community and parent needs.

(ii) Program recruitment, selection, and enrollment priorities.

Policy Council Sec. 642 (c)(2) *continued*

(iii) Applications for funding and amendments to applications for funding for programs under this subchapter, prior to submission of applications described in this clause.

(iv) Budget planning for program expenditures, including policies for reimbursement and participation in policy council activities.

(v) Bylaws for the operation of the policy council.

(vi) Program personnel policies and decisions regarding the employment of program staff, consistent with paragraph (1)(E)(iv)(IX), including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff.

(vii) Developing procedures for how members of the policy council of the Head Start agency will be elected.

(viii) Recommendations on the selection of delegate agencies and the service areas for such agencies.

Policy Committees Sec. 642 (c)(3)

(3) Policy Committees – Each delegate agency shall create a policy committee, which shall --

(A) be elected and composed of members, consistent with paragraph (2)(B) (with respect to delegate agencies);

(B) follow procedures to prohibit conflict of interest, consistent with clauses (i) and (ii) of paragraph (2)(C) (with respect to delegate agencies); and

(C) be responsible for approval and submission of decisions about activities as they relate to the delegate agency, consistent with paragraph (2)(D) (with respect to delegate agencies).

Program Governance Administration Sec. 642 (d)

(1) Impasse Policies – The Secretary shall develop policies, procedures, and guidance for Head Start agencies concerning

- **(A)** the resolution of internal disputes, including any impasse in the governance of Head Start programs; and
- **(B)** the facilitation of meaningful consultation and collaboration about decisions of the governing body and policy council.

(2) 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; and
- **(I)** the program information reports.

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

HEAD START PROGRAM PERFORMANCE STANDARDS

45 CFR §1301.1 Purpose.

An agency, as defined in part 1305 of this chapter, must establish and maintain a formal structure for program governance that includes a governing body, a policy council at the agency level and policy committee at the delegate level, and a parent committee. Governing bodies have a legal and fiscal responsibility to administer and oversee the agency's Head Start and Early Head Start programs. Policy councils are responsible for the direction of the agency's Head Start and Early Head Start programs.

45 CFR §1301.2 Governing body.

(a) Composition. The composition of a governing body must be in accordance with the requirements specified at section 642(c)(1)(B) of the Act, except where specific exceptions are authorized in the case of public entities at section 642(c)(1)(D) of the Act. Agencies must ensure members of the governing body do not have a conflict of interest, pursuant to section 642(c)(1)(C) of the Act.

(b) Duties and responsibilities.

(1) The governing body is responsible for activities specified at section 642(c)(1)(E) of the Act.

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

(c) Advisory committees.

(1) A governing body may establish advisory committees as it deems necessary for effective governance and improvement of the program.

(2) If a governing body establishes an advisory committee to oversee key responsibilities related to program governance, it must:

(i) Establish the structure, communication, and oversight in such a way that the governing body continues to maintain its legal and fiscal responsibility for the Head Start agency; and,

(ii) Notify the responsible HHS official of its intent to establish such an advisory committee.

45 CFR §1301.3 Policy council and policy committee.

(a) Establishing policy councils and policy committees. Each agency must establish and maintain a policy council responsible for the direction of the Head Start program at the agency level, and a policy committee at the delegate level. If an agency delegates operational responsibility for the entire Head Start or Early Head Start program to one delegate agency, the policy council and policy committee may be the same body.

(b) Composition.

(1) A program must establish a policy council in accordance with section 642(c)(2)(B) of the Act, or a policy committee at the delegate level in accordance with section 642(c)(3) of the Act, as early in the program year as possible. Parents of children currently enrolled in each program option must be proportionately represented on the policy council and on the policy committee at the delegate level.

(2) The program must ensure members of the policy council, and of the policy committee at the delegate level, do not have a conflict of interest pursuant to sections 642(c)(2)(C) and 642(c)(3)(B) of the Act. Staff may not serve on the policy council or policy committee at the delegate level except parents who occasionally substitute as staff. In the case of tribal grantees, this exclusion applies only to tribal staff who work in areas directly related to or which directly impact administrative, fiscal, or programmatic issues.

(c) Duties and responsibilities.

(1) A policy council is responsible for activities specified at section 642(c)(2)(D) of the Act. A policy committee must approve and submit to the delegate agency its decisions in each of the following areas referenced at section 642(c)(2)(D)(i) through (vii) of the Act.

(2) A policy council, and a policy committee at the delegate level, must use ongoing monitoring results, data on school readiness goals, other information described in §1302.102, and information described in section 642(d)(2) of the Act to conduct its responsibilities.

(d) Term.

(1) A member will serve for one year.

(2) If the member intends to serve for another year, s/he must stand for re-election.

(3) The policy council, and policy committee at the delegate level, must include in its bylaws how many one-year terms, not to exceed five terms, a person may serve.

(4) A program must seat a successor policy council, or policy committee at the delegate level, before an existing policy council, or policy committee at the delegate level, may be dissolved.

(e) Reimbursement. A program must enable low-income members to participate fully in their policy council or policy committee responsibilities by providing, if necessary, reimbursements for reasonable expenses incurred by the low-income members.

45 CFR §1301.4 Parent committees.

(a) Establishing parent committees. A program must establish a parent committee comprised exclusively of parents of currently enrolled children as early in the program year as possible. This committee must be established at the center level for center-based programs and at the local program level for other program options. When a program operates more than one option, parents may choose to have a separate committee for each option or combine membership. A program must ensure that parents of currently enrolled children understand the process for elections to the policy council or policy committee and other leadership opportunities.

(b) Requirements of parent committees. Within the parent committee structure, a program may determine the best methods to engage families using strategies that are most effective in their community, as long as the program ensures the parent committee carries out the following minimum responsibilities:

(1) Advise staff in developing and implementing local program policies, activities, and services to ensure they meet the needs of children and families;

(2) Have a process for communication with the policy council and policy committee; and

(3) Within the guidelines established by the governing body, policy council or policy committee, participate in the recruitment and screening of Early Head Start and Head Start employees.

45 CFR §1301.5 Training.

An agency must provide appropriate training and technical assistance or orientation to the governing body, any advisory committee members, and the policy council, including training on program performance standards and training indicated in §1302.12(m) to ensure the members understand the information they receive and can effectively oversee and participate in the programs in the Head Start agency.

45 CFR §1301.6 Impasse procedures.

(a) To facilitate meaningful consultation and collaboration about decisions of the governing body and the policy council, each agency's governing body and policy council jointly must establish written procedures for resolving internal disputes between the governing board and policy council in a timely manner that include impasse procedures. These procedures must:

(1) Demonstrate that the governing body considers proposed decisions from the policy council and that the policy council considers proposed decisions from the governing body;

(2) If there is a disagreement, require the governing body and the policy council to notify the other in writing why it does not accept a decision; and,

(3) Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal.

(b) If the agency's decision-making process does not result in a resolution and an impasse continues, the governing body and policy council must select a mutually agreeable third party mediator and participate in a formal process of mediation that leads to a resolution of the dispute.

(c) For all programs except American Indian and Alaska Native programs, if no resolution is reached with a mediator, the governing body and policy council must select a mutually agreeable arbitrator whose decision is final.

ADMINISTRATION FOR CHILDREN & FAMILIES

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