

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

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Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming ACF-OHS-PI-24-05

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

1. **Log Number:** ACF-OHS-PI-24-05
2. **Issuance Date:** 08/21/2024
3. **Originating Office:** Office of Head Start
4. **Key Words:** Head Start Workforce; Wages; Benefits; Mental Health; Quality Improvement

Program Instruction

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

Subject: Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming

Instruction:

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

The Office of Head Start (OHS) first proposed these changes in a notice of proposed rulemaking (NPRM), published on November 20, 2023. During the NPRM comment period, OHS received approximately 1,300 public comments, including from Head Start programs; national, regional, and state Head Start associations, labor unions; research organizations; individual Head Start staff and families; and members of the U.S. Congress. The final rule takes into consideration and is responsive to the public comments.

The updated Performance Standards respond to structural concerns affecting the sustainability of Head Start programs. They provide clear federal requirements for:

- Wages and benefits to support the Head Start workforce
- Better integration of mental health across all aspects of Head Start programming
- Quality improvement and clarity of requirements in other topic areas

The final rule is effective immediately. Programs are expected to comply with some of the updated requirements 60 days after the rule is published (October 21, 2024). Programs are granted more time to comply with several requirements, including new wage and benefit requirements, as noted in the Effective and Compliance Dates section of the rule.

Workforce

This rule supports Head Start programs in maintaining a diverse and well-qualified workforce by ensuring staff are more fairly compensated, which in turn promotes more stable, higher-quality services for enrolled children and families. Previously, the Performance Standards did not include any specific requirements for staff wages or benefits, which has generally led to low compensation for staff and high staff turnover rates for programs.

Staff Wages

The updated Performance Standards require programs to provide competitive wages for staff by August 1, 2031. Specifically, the rule will require programs to establish or update a pay scale for all positions. It will also require programs to pay Head Start educators annual salaries that are comparable to public school preschool teachers or 90% of public kindergarten teachers, accounting for responsibilities, qualifications, experience, and work schedule. The updated Performance Standards will also require programs to pay all staff a wage sufficient to cover basic costs of living and to ensure wages are comparable across Head Start Preschool and Early Head Start programs.

The final rule includes a small agency exemption for Head Start agencies with fewer than 200 funded slots. These small agencies must develop a pay scale for all employees and make measurable improvements in wages for staff over time. However, small agencies are not required to pay wages that are comparable to public school preschool teachers (or 90% of public kindergarten teachers), nor are they required to comply with the pay floor policy described above.

The final rule includes flexibility for the Secretary of the Department of Health and Human Services to establish in 2028 a waiver process for most of the rule's wage requirements, if needed, due to low appropriations over the prior four years. The waiver would be for programs that are already meeting quality benchmarks and would otherwise have to reduce enrolled Head Start slots to implement these requirements.

Staff Benefits

By August 1, 2028, the updated Performance Standards will require programs to provide or facilitate access to high-quality affordable health care coverage; offer paid leave; and offer access to short-term, free or minimal-cost behavioral health services for fulltime staff. For part-time staff, programs will be required to facilitate access to high-quality, affordable health care coverage. Programs will also be required to facilitate access to affordable child care and to the Public Service Loan Forgiveness program or other applicable student loan debt relief programs for any eligible staff members.

The final rule also includes flexibility for small agencies with 200 or fewer funded slots. As with wages, these small agencies must still make measurable improvements in benefits for Head Start staff over time.

Staff Wellness

The updated Performance Standards require programs to cultivate a culture of wellness that empowers staff as professionals and supports them to effectively accomplish daily job responsibilities in a high-quality manner. As part of this larger effort to promote the wellness of Head Start staff, by August 1, 2027, programs must provide each staff member with regular breaks during their work shifts that are of adequate length based on hours worked.

Mental Health

In the updated Performance Standards, mental health is integrated more intentionally and consistently across program systems to better support children, families, and staff. Programs are required to take a multidisciplinary approach to foster a program-wide culture of wellness. The Performance Standards also clarify the role and responsibilities of mental health consultants, and allow for behavioral health support specialists to be used in coordination with a mental health consultant. These changes address workforce shortages while maintaining a focus on high-quality, integrated mental health supports.

Other Quality Improvements

The updated Performance Standards enhance and clarify requirements in other topic areas to promote consistent high-quality services and support child well-being. These changes include:

- More reasonable caseloads for family service workers
- Promoting child safety in Head Start programs
- Preventing and addressing lead exposure in the water and paint of Head Start facilities
- Updates to the community assessment process
- Enhanced services for expectant families
- Requirements for programs to identify barriers to program enrollment and attendance, such as lack of transportation

Finally, the changes include some clarifications to promote better transparency and clarity of understanding for recipients.

Members of the Head Start community are urged to take the time to read the final rule in its entirety, including the section-by-section discussion of public comments. OHS will continue to provide [direction, guidance, and resources](#) that support our shared mission to prepare Head Start children and families for school and beyond.

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

Sincerely,

/ Khari M. Garvin /

Khari M. Garvin
Director
Office of Head Start

See PDF Version of Program Instruction:

[Final Rule on Supporting the Head Start Workforce and Consistent Quality Programming](#) (41.24 KB)

Historical Document

Fiscal Year 2025 Monitoring Process for Head Start and Early Head Start Recipients

eclkc.ohs.acf.hhs.gov/policy/im/acf-ohs-im-24-02

Fiscal Year 2025 Monitoring Process for Head Start and Early Head Start Recipients ACF-OHS-IM-24-02

U.S. Department
of Health and Human Services

ACF
Administration for Children and Families

1. **Log Number:** ACF-OHS-IM-24-02
2. **Issuance Date:** 06/27/2024
3. **Originating Office:** Office of Head Start
4. **Key Words:** Monitoring; FY 2025; CLASS®

Information Memorandum

To: All Head Start and Early Head Start Recipients

Subject: Fiscal Year 2025 Monitoring Process for Head Start and Early Head Start Recipients

Information:

[Section 641A](#) of the Improving Head Start for School Readiness Act of 2007 (the Act) requires the Office of Head Start (OHS) to implement ongoing monitoring of all programs receiving federal funds.

This Information Memorandum (IM) outlines the OHS monitoring process for fiscal year 2025 (FY25). It describes the types of monitoring reviews that recipients may experience, highlighting Focus Area 1 (FA1), Focus Area 2 (FA2), Classroom Assessment Scoring System (CLASS®), Risk Assessment Notification (RAN), and unannounced reviews.

FY25 Monitoring Review Types and Start Dates

Review
Type*

FY25 Implementation

Start Date

Review Type*	FY25 Implementation	Start Date
FA1	FA1 reviews are conducted through a virtual format.	October 2024
FA2	FA2 reviews are conducted using a combination of virtual and on-site monitoring.	October 2024
CLASS [®]	CLASS reviews are conducted again this year using either self-recorded videos or onsite formats.	October 2024
Follow-up Reviews	Follow-up reviews are conducted virtually or in person.	Start dates will coincide with the end of the corrective action period.
RAN	RAN reviews are conducted through a virtual format.	As needed
Other	OHS reserves the right to conduct special off-site or on-site reviews.	As needed

* *Monitoring reviews may be conducted with or without prior notification to the recipient. OHS reserves the right to conduct unannounced reviews at any time.*

FA1 Reviews

The FA1 review is an opportunity for recipients to describe their approach and plan for providing high-quality services to children and families. It typically occurs in the first or second year of the grant period. This focus area determines if programs are meeting the requirements of the Head Start Program Performance Standards (HSPPS), Uniform Guidance, and Head Start Act. The FA1 informs OHS' understanding of each recipient's foundation for program services — staffing structure, program design and governance, education, health and family services, and fiscal infrastructure. The FA1 review also allows OHS to assist recipients in fulfilling application commitments, provide resources to address any identified issues, and support recipients in reaching their goals.

FA2 Reviews

The FA2 review is an opportunity for recipients to demonstrate their implementation of high-quality services to children and families that meet Head Start requirements. It typically occurs in the third or fourth year of a grant period. This focus area broadens OHS' understanding of each recipient's performance and determines if programs are meeting the requirements of the HSPPS, Uniform Guidance, and Head Start Act.

CLASS[®] Reviews

Section 641A(c)(2)(F) of the Act requires OHS to assess the quality of teacher–child interactions using a valid and reliable observation measure. For the upcoming FY25 monitoring year, OHS will continue to use the 2008 edition of the Classroom Assessment Scoring System (CLASS[®]) Pre-K Teacher–Child Observation Instrument. Scores from CLASS observations will count toward Designation Renewal System (DRS) determinations using the competitive thresholds established in the [Final Rule on DRS Changes](#).

For FY25, recipients that are scheduled for a CLASS monitoring review will have the option to self-record and submit their own videos (Video Review) or request a traditional on-site review with certified CLASS observers (On-site Review).

American Indian and Alaska Native (AIAN) Head Start programs have the option to do a self-review for the CLASS. OHS will transmit a letter to AIAN grant recipients with additional information on this option.

All recipients will have the opportunity to attend information sessions specifically developed to discuss FY25 CLASS options, including a group of sessions convened specifically for American Indian and Alaska Native recipients.

RAN Reviews

OHS conducts Risk Assessment Notification reviews, as necessary, to address child health and safety incidents. They are initiated when OHS needs to gather more information about significant incidents affecting program participants' health and safety. These reviews have a specific focus on abuse, neglect, inappropriate conduct, inadequate supervision, or unauthorized releases in Head Start programs.

RAN reviews:

- Ensure prompt and accurate reporting of serious incidents
- Investigate contributing program or management factors
- Communicate necessary corrective actions
- Provide feedback to improve program management and prevent future incidents

Other Reviews

Special reviews are conducted, as needed, to explore concerns outside of the typical FA1 or FA2 schedule. OHS reserves the right to conduct unannounced reviews at any time.

Scheduling

Each year, recipients are required to submit an accurate calendar of availability, which is used to schedule monitoring reviews. The availability calendar also gives recipients a way to inform OHS as to when their program is not operational and when children are not in session. Recipients should immediately update their calendars as changes in program availability occur. Please note that OHS has very limited capacity to accommodate requests to reschedule reviews and can only do so under exceptional circumstances.

Monitoring reviews can also be conducted with or without prior notification to the recipient that it will take place.

Communications

Recipients scheduled to receive a monitoring review in FY25 will receive a notification letter 45 calendar days before the start of the event. They can also expect a planning call with their assigned coordinator to discuss their review. During the initial call, recipients should share their program's current service delivery options. OHS Review Reports are typically issued within 60 calendar days of the monitoring review.

If you have any questions regarding the FY25 monitoring season, please contact your regional office.

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

Sincerely,

/Khari M. Garvin/

Khari M. Garvin
Director
Office of Head Start

See PDF Version of Information Memorandum:

[Fiscal Year 2025 Monitoring Process for Head Start and Early Head Start Recipients](#) (45.36 KB)

Historical Document



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | Region 5 | 233 North Michigan Avenue, Suite 400, Chicago IL 60601 | eclkc.ohs.acf.hhs.gov

June 17, 2024

Mr. Cory Stine, Board Chair
Great Lakes Community Action Partnership
127 S Front St
Fremont, OH 43420-3021

Re: Grant No. 05CH011180

Dear Mr. Stine,

The Office of Head Start (OHS) is writing to inform you that the 12-month period in which Great Lakes Community Action Partnership was required to implement a plan to reduce underenrollment concluded on April 7, 2024. We are pleased to inform you that, based on the Head Start and Early Head Start enrollment levels reported for May, 2024, Great Lakes Community Action Partnership enrolled at least 97 percent of its funded enrollment for Head Start and Early Head Start. Great Lakes Community Action Partnership met the criteria listed in Section 641A(h)(4) of the Head Start Act and successfully implemented a plan to reduce underenrollment over the 12-month period. We know that achieving full enrollment took significant work and effort, and we congratulate you on this important accomplishment.

As we look forward, the OHS will continue to evaluate enrollment to ensure Great Lakes Community Action Partnership maintains at least 97 percent enrollment for six consecutive months. If this is achieved, a Completion Letter will be issued as formal recognition of completion of the underenrollment plan. Monthly enrollment must continue to be reported by center and program option using the Center Level Reporting Spreadsheet until further notice. The Regional Office remains available to provide support and technical assistance as you work to maintain your enrollment levels.

Please be advised that the inability to maintain at least 97 percent enrollment in your Head Start and/or Early Head Start program for six consecutive months **may** result in the respective program(s) being designated as Chronically Underenrolled, and could include a reduction in Great Lakes Community Action Partnership's base grant award, pursuant to Section 641A(h)(5) of the Head Start Act.

The OHS remains committed to supporting grant recipients' efforts to achieve full enrollment while maintaining the highest quality of services for children and families. Please contact your Regional Office if there are any questions or concerns. Thank you for all you do on behalf of children and families.

For more information about the Full Enrollment Initiative, please see [ACF-PI-HS-18-04](#).

Sincerely,

/Karen McNamara/

Karen McNamara
Regional Program Manager
Office of Head Start, Region 5

ATTACHMENT A

[Sec. 641A Standards; Monitoring of Head Start Agencies and Programs](#)

...

(h) Reduction of Grants and Redistribution of Funds in Cases of Underenrollment-

(1) DEFINITIONS- In this subsection:

(A) ACTUAL ENROLLMENT- The term 'actual enrollment' means, with respect to the program of a Head Start agency, the actual number of children enrolled in such program and reported by the agency (as required in paragraph (2)) in a given month.

(B) BASE GRANT- The term 'base grant' has the meaning given the term in section 640(a)(7).

(C) FUNDED ENROLLMENT- The term 'funded enrollment' means, with respect to the program of a Head Start agency in a fiscal year, the number of children that the agency is funded to serve through a grant for the program during such fiscal year, as indicated in the grant agreement.

(2) ENROLLMENT REPORTING REQUIREMENT- Each entity carrying out a Head Start program shall report on a monthly basis to the Secretary and the relevant Head Start agency

(A) the actual enrollment in such program; and

(B) if such actual enrollment is less than the funded enrollment, any apparent reason for such enrollment shortfall.

(3) SECRETARIAL REVIEW AND PLAN- The Secretary shall

(A) on a semiannual basis, determine which Head Start agencies are operating with an actual enrollment that is less than the funded enrollment based on not less than 4 consecutive months of data;

(B) for each such Head Start agency operating a program with an actual enrollment that is less than its funded enrollment, as determined under subparagraph (A), develop, in collaboration with such agency, a plan and timetable for reducing or eliminating underenrollment taking into consideration--

(i) the quality and extent of the outreach, recruitment, and communitywide strategic planning and needs assessment conducted by such agency;

(ii) changing demographics, mobility of populations, and the identification of new underserved low-income populations;

(iii) facilities-related issues that may impact enrollment;

(iv) the ability to provide full-working-day programs, where needed, through funds made available under

this subchapter or through collaboration with entities carrying out other early childhood education and development programs, or programs with other funding sources (where available);

(v) the availability and use by families of other early childhood education and development options in the community served; and

(vi) agency management procedures that may impact enrollment; and

(C) provide timely and ongoing technical assistance to each agency described in subparagraph (B) for the purpose of assisting the Head Start agency to implement the plan described in such subparagraph.

(4) IMPLEMENTATION- Upon receipt of the technical assistance described in paragraph (3)(C), a Head Start agency shall immediately implement the plan described in paragraph (3)(B). The Secretary shall, where determined appropriate, continue to provide technical assistance to such agency.

(5) SECRETARIAL REVIEW AND ADJUSTMENT FOR CHRONIC UNDERENROLLMENT-

(A) IN GENERAL- If, after receiving technical assistance and developing and implementing the plan as described in paragraphs (3) and (4) for 12 months, a Head Start agency is operating a program with an actual enrollment that is less than 97 percent of its funded enrollment, the Secretary may--

(i) designate such agency as chronically underenrolled; and

(ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled under paragraph (3)(A).

(B) WAIVER OR LIMITATION OF REDUCTIONS- The Secretary may, as appropriate, waive or reduce the percentage recapturing, withholding, or reduction otherwise required by subparagraph (A), if, after the implementation of the plan described in paragraph (3)(B), the Secretary finds that--

(i) the causes of the enrollment shortfall, or a portion of the shortfall, are related to the agency's serving significant numbers of highly mobile children, or are other significant causes as determined by the Secretary;

(ii) the shortfall can reasonably be expected to be temporary; or

(iii) the number of slots allotted to the agency is small enough that underenrollment does not create a significant shortfall.

(6) REDISTRIBUTION OF FUNDS-

(A) IN GENERAL- Funds held by the Secretary as a result of recapturing, withholding, or reducing a base grant in a fiscal year shall be redistributed by the end of the following fiscal year as follows:

(i) INDIAN HEAD START PROGRAMS- If such funds are derived from an Indian Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Head Start programs.

(ii) MIGRANT AND SEASONAL HEAD START PROGRAMS- If such funds are derived from a migrant or seasonal Head Start program, then such funds shall be redistributed to increase enrollment by the

end of the following fiscal year in 1 or more programs of the type from which such funds are derived.

(iii) EARLY HEAD START PROGRAMS- If such funds are derived from an Early Head Start program in a State, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Early Head Start programs in that State. If such funds are derived from an Indian Early Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Early Head Start programs.

(iv) OTHER HEAD START PROGRAMS- If such funds are derived from a Head Start program in a State (excluding programs described in clauses (i) through (iii)), then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Head Start programs (excluding programs described in clauses (i) through (iii)) that are carried out in such State.

(B) ADJUSTMENT TO FUNDED ENROLLMENT- The Secretary shall adjust as necessary the requirements relating to funded enrollment indicated in the grant agreement of a Head Start agency receiving redistributed funds under this paragraph.



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Office of Head Start | Region 5 | 233 North Michigan Avenue, Suite 400, Chicago IL 60601 | eclkc.ohs.acf.hhs.gov

June 17, 2024

Mr. Cory Stine, Board Chair
Great Lakes Community Action Partnership
127 S Front St
Fremont, OH 43420-3021

Re: Grant No. 05HP000472

Dear Mr. Stine,

The Office of Head Start (OHS) is writing to inform you that the 12-month period in which Great Lakes Community Action Partnership was required to implement a plan to reduce underenrollment concluded on April 7, 2024. We are pleased to inform you that, based on the Early Head Start enrollment levels reported for May, 2024, Great Lakes Community Action Partnership enrolled at least 97 percent of its funded enrollment. Great Lakes Community Action Partnership met the criteria listed in Section 641A(h)(4) of the Head Start Act and successfully implemented a plan to reduce underenrollment over the 12-month period. We know that achieving full enrollment took significant work and effort, and we congratulate you on this important accomplishment.

As we look forward, the OHS will continue to evaluate enrollment to ensure Great Lakes Community Action Partnership maintains at least 97 percent enrollment for six consecutive months. If this is achieved, a Completion Letter will be issued as formal recognition of completion of the underenrollment plan. Monthly enrollment must continue to be reported by center and program option using the Center Level Reporting Spreadsheet until further notice. The Regional Office remains available to provide support and technical assistance as you work to maintain your enrollment levels.

Please be advised that the inability to maintain at least 97 percent enrollment for six consecutive months **may** result in your program being designated as Chronically Underenrolled and could include a reduction in Great Lakes Community Action Partnership's base grant award, pursuant to Section 641A(h)(5) of the Head Start Act.

The OHS remains committed to supporting grant recipients' efforts to achieve full enrollment while maintaining the highest quality of services for children and families. Please contact your Regional Office if there are any questions or concerns. Thank you for all you do on behalf of children and families.

For more information about the Full Enrollment Initiative, please see [ACF-PI-HS-18-04](#).

Sincerely,

/Karen McNamara/

Karen McNamara

Regional Program Manager
Office of Head Start, Region 5

ATTACHMENT A

Sec. 641A Standards; Monitoring of Head Start Agencies and Programs

...

(h) Reduction of Grants and Redistribution of Funds in Cases of Underenrollment-

(1) DEFINITIONS- In this subsection:

(A) ACTUAL ENROLLMENT- The term 'actual enrollment' means, with respect to the program of a Head Start agency, the actual number of children enrolled in such program and reported by the agency (as required in paragraph (2)) in a given month.

(B) BASE GRANT- The term 'base grant' has the meaning given the term in section 640(a)(7).

(C) FUNDED ENROLLMENT- The term 'funded enrollment' means, with respect to the program of a Head Start agency in a fiscal year, the number of children that the agency is funded to serve through a grant for the program during such fiscal year, as indicated in the grant agreement.

(2) ENROLLMENT REPORTING REQUIREMENT- Each entity carrying out a Head Start program shall report on a monthly basis to the Secretary and the relevant Head Start agency

(A) the actual enrollment in such program; and

(B) if such actual enrollment is less than the funded enrollment, any apparent reason for such enrollment shortfall.

(3) SECRETARIAL REVIEW AND PLAN- The Secretary shall

(A) on a semiannual basis, determine which Head Start agencies are operating with an actual enrollment that is less than the funded enrollment based on not less than 4 consecutive months of data;

(B) for each such Head Start agency operating a program with an actual enrollment that is less than its funded enrollment, as determined under subparagraph (A), develop, in collaboration with such agency, a plan and timetable for reducing or eliminating underenrollment taking into consideration--

(i) the quality and extent of the outreach, recruitment, and communitywide strategic planning and needs assessment conducted by such agency;

(ii) changing demographics, mobility of populations, and the identification of new underserved low-income populations;

(iii) facilities-related issues that may impact enrollment;

(iv) the ability to provide full-working-day programs, where needed, through funds made available under this subchapter or through collaboration with entities carrying out other early childhood education and development programs, or programs with other funding sources (where available);

(v) the availability and use by families of other early childhood education and development options in the community served; and

(vi) agency management procedures that may impact enrollment; and

(C) provide timely and ongoing technical assistance to each agency described in subparagraph (B) for the purpose of assisting the Head Start agency to implement the plan described in such subparagraph.

(4) IMPLEMENTATION- Upon receipt of the technical assistance described in paragraph (3)(C), a Head Start agency shall immediately implement the plan described in paragraph (3)(B). The Secretary shall, where determined appropriate, continue to provide technical assistance to such agency.

(5) SECRETARIAL REVIEW AND ADJUSTMENT FOR CHRONIC UNDERENROLLMENT-

(A) IN GENERAL- If, after receiving technical assistance and developing and implementing the plan as described in paragraphs (3) and (4) for 12 months, a Head Start agency is operating a program with an actual enrollment that is less than 97 percent of its funded enrollment, the Secretary may--

(i) designate such agency as chronically underenrolled; and

(ii) recapture, withhold, or reduce the base grant for the program by a percentage equal to the percentage difference between funded enrollment and actual enrollment for the program for the most recent year for which the agency is determined to be underenrolled under paragraph (3)(A).

(B) WAIVER OR LIMITATION OF REDUCTIONS- The Secretary may, as appropriate, waive or reduce the percentage recapturing, withholding, or reduction otherwise required by subparagraph (A), if, after the implementation of the plan described in paragraph (3)(B), the Secretary finds that--

(i) the causes of the enrollment shortfall, or a portion of the shortfall, are related to the agency's serving significant numbers of highly mobile children, or are other significant causes as determined by the Secretary;

(ii) the shortfall can reasonably be expected to be temporary; or

(iii) the number of slots allotted to the agency is small enough that underenrollment does not create a significant shortfall.

(6) REDISTRIBUTION OF FUNDS-

(A) IN GENERAL- Funds held by the Secretary as a result of recapturing, withholding, or reducing a base grant in a fiscal year shall be redistributed by the end of the following fiscal year as follows:

(i) INDIAN HEAD START PROGRAMS- If such funds are derived from an Indian Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Head Start programs.

(ii) MIGRANT AND SEASONAL HEAD START PROGRAMS- If such funds are derived from a migrant or seasonal Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more programs of the type from which such funds are derived.

(iii) EARLY HEAD START PROGRAMS- If such funds are derived from an Early Head Start program in

a State, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Early Head Start programs in that State. If such funds are derived from an Indian Early Head Start program, then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Indian Early Head Start programs.

(iv) OTHER HEAD START PROGRAMS- If such funds are derived from a Head Start program in a State (excluding programs described in clauses (i) through (iii)), then such funds shall be redistributed to increase enrollment by the end of the following fiscal year in 1 or more Head Start programs (excluding programs described in clauses (i) through (iii)) that are carried out in such State.

(B) ADJUSTMENT TO FUNDED ENROLLMENT- The Secretary shall adjust as necessary the requirements relating to funded enrollment indicated in the grant agreement of a Head Start agency receiving redistributed funds under this paragraph.



ADMINISTRATION FOR
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Office of Head Start | 330 C St., SW, 4th Floor, Washington DC 20201 | eclkc.ohs.acf.hhs.gov

June 13, 2024

Great Lakes Community Action Partnership

Re: Grant No. 05HP000472,90CM009853

Dear Grant Recipient:

The Administration for Children and Families (ACF), Office of Head Start (OHS) recently conducted a monitoring review of your program. The attached report contains information about your agency's performance and compliance with the requirements of the Head Start Program Performance Standards, Public Law 110-134, Improving Head Start for School Readiness Act of 2007, and other applicable regulations.

Please contact your Regional Office for guidance should you have any questions or concerns. Your Regional Office will follow up on the content of this report and can work with you to identify resources to support your program's continuous improvement.

If the report has findings the corrective action period will begin 72 hours from the time this email was sent.

Sincerely,

OHS Monitoring Team



ADMINISTRATION FOR
CHILDREN & FAMILIES

Office of Head Start | 4th Floor – Switzer Memorial Building, 330 C Street SW, Washington DC 20024 eclkc.ohs.acf.hhs.gov

Program Performance Summary Report

To: Authorizing Official/Board Chairperson

Mr. Cory Stine

Great Lakes Community Action Partnership

127 S Front St

Fremont, OH 43420 - 3021

From: Responsible HHS Official

Date: 06/12/2024

Mr. Khari M. Garvin

Director, Office of Head Start

From June 3, 2024 to June 7, 2024, the Administration for Children and Families (ACF) conducted a Focus Area Two (FA2) monitoring review of Great Lakes Community Action Partnership. This report contains information about the grant recipient's performance and compliance with the requirements of the Head Start Program Performance Standards (HSPPS) or Public Law 110-134, *Improving Head Start for School Readiness Act of 2007*.

The Office of Head Start (OHS) would like to thank your governing body, policy council, parents, and staff for their engagement in the review process. Based on the information gathered during this review, it has been determined that your program meets the requirements of all applicable HSPPS, laws, regulations, and policy requirements.

Please contact your Regional Office for guidance should you have any questions or concerns. Your Regional Office will follow up on the content of this report and can work with you to identify resources to support your program's continuous improvement.

DISTRIBUTION OF THE REPORT

Copies of this report will be distributed to the following:

Ms. Karen McNamara, Regional Program Manager

Ms. Sandra Carton, Regional Program Manager

Mrs. Ruthann House, Chief Executive Officer/Executive Director

Mrs. Jacquie Wells, Early Head Start Director

Grant(s) included as part of this review

Grant Recipient Name	Grant Number(s)
Great Lakes Community Action Partnership	05HP000472 90CM009853

Glossary of Terms

Term	Definition
Additional Feedback for Program Improvement	An area in which the agency needs to improve performance, also known as an Area of Concern (AOC). These issues should be discussed with the grant recipient's Regional Office for possible technical assistance. This feedback is not considered a non-compliance with federal requirements.
Area of Noncompliance (ANC)	An area in which the agency is out of compliance with Federal requirements (including but not limited to the Head Start Act or one or more of the regulations) in one or more areas of performance. This status requires a written timeline for correction and possible technical assistance or guidance from the grant recipient's program specialist. If not corrected within the specified timeline, this status becomes a deficiency.
Deficiency	<p>As defined in the Head Start Act, the term "deficiency" means:</p> <p>(A) a systemic or substantial material failure of an agency in an area of performance that the Secretary determines involves:</p> <ul style="list-style-type: none"> (i) a threat to the health, safety, or civil rights of children or staff; (ii) a denial to parents of the exercise of their full roles and responsibilities related to program operations; (iii) a failure to comply with standards related to early childhood development and health services, family and community partnerships, or program design and management; (iv) the misuse of funds received under this subchapter; (v) loss of legal status (as determined by the Secretary) or financial viability, loss of permits, debarment from receiving Federal grants or contracts, or the improper use of Federal funds; or (vi) failure to meet any other Federal or State requirement that the agency has shown an unwillingness or inability to correct, after notice from the Secretary, within the period specified; <p>(B) systemic or material failure of the governing body of an agency to fully exercise its legal and fiduciary responsibilities; or</p> <p>(C) an unresolved area of noncompliance.</p>
Strong Practice	An activity or strategy that shows promise for long term sustainable impact. A Strong Practice has an objective basis for claiming effectiveness, potential for replication, and is shareable among other organizations.

How To Read This Report

The Focus Area Two report includes the following sections:

- **Program Overview**, provides a summary describing the grant recipient.
- **Review Details**, provides details on the grant recipient performance in each Content Area, Performance Area, and Performance Measure.

Program Overview

Great Lakes Community Action Partnership has served children in north central Ohio since 1965. The grant recipient receives funding to enroll 644 children. Program options include Early Head Start-Child Care Partnership services in five counties bordering Lake Erie and Migrant Head Start services in four counties across the state.

Review Details

This section of the report provides details on grant recipient performance in each Content Area, Performance Area, and Performance Measure.

- Each Performance Area includes the compliant Performance Measures monitored in this review.
- If there are any findings or Strong Practices observed, they will be listed within that Performance Area.



Program Design, Management, and Improvement

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings, and additional feedback as applicable.

Performance Area: Program Design and Strategic Planning

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient adjusts its program design to remain responsive to shifts in community needs, strengths, and resources over time.
- The grant recipient uses program data to routinely monitor performance, progress towards goals and desired outcomes, and drive program improvement.
- The grant recipient maintains a system and procedures for collecting, managing, and reporting on accurate, timely data.

Strong Practice Details:

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient uses data to compare who enrolls for program services by race, DLL status, housing status, or other demographics to assess program access and equity and address any inequities identified.

Performance Area: Program Governance

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient collaborates effectively across program staff, the governing body, and the policy council to facilitate effective program governance.
- The grant recipient's governing body is engaged and effective in providing its legal and fiscal oversight.
- The grant recipient's policy councils and policy committees are effective in providing program direction.

Performance Area: Staffing and Staff Supports

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient supports staff members' continuous improvement and professional development.
- The grant recipient develops systems that support the Head Start workforce by providing fair compensation, opportunities for career advancement, and a positive work environment for staff.
- The grant recipient's leadership and management team have clearly defined, manageable roles and responsibilities and the appropriate experience to effectively execute Head Start program operations.
- The grant recipient establishes high expectations for staff and implements ongoing communication and training systems to reinforce organizational accountability.



Education and Child Development Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings, and additional feedback as applicable.

Performance Area: Curricula, Screening, and Assessment Tools

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements appropriate ongoing child assessment tools to support children's progress and to individualize for every child.
- The grant recipient implements appropriate screening tools to refer children as indicated for evaluation.
- The grant recipient implements research-based and culturally appropriate curricula to achieve child outcomes.

Strong Practice Details:

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient routinely (at least 3 times per year for year-round programs) observes and supports proper implementation of the curriculum through the regular and ongoing use of curriculum fidelity tools in all classrooms and programs.

Performance Area: Teaching Strategies and Learning Environments

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient provides well-organized learning environments and schedules that promote healthy development for enrolled children.
- The grant recipient staff members provide responsive, effective care and effective teaching practices that are tailored to meet the needs of all children.
- The grant recipient uses intentionally designed lesson plans to deliver developmentally appropriate experiences for children.

Performance Area: Qualifications, Professional Development, and Coaching

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient offers education staff a system of professional development to support delivery of quality education and child development services.
- The grant recipient implements a research-based coaching strategy to support education staff to use effective teaching practices.
- The grant recipient has qualified education staff.



Health Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings, and additional feedback as applicable.

Performance Area: Child Health and Oral Health Status and Care

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient performs or obtains vision and hearing screenings for all children.
- The grant recipient provides health education opportunities to parents, assists them with understanding their child's health needs, and supports parents to navigate health systems.
- The grant recipient supports children to become and remain up-to-date on a schedule of age-appropriate medical and oral health care, including needs for referrals and follow-up care.
- The grant recipient leverages the Health Services Advisory Committee (HSAC) to address prevalent community health needs.

Performance Area: Mental Health and Social and Emotional Well-Being

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient develops a positive program environment, in partnership with a qualified mental health consultant, that promotes the mental health and social emotional well-being of children.
- The grant recipient provides family support services for mental health and social emotional well-being.
- The grant recipient implements positive discipline practices and policies that prohibit the use of expulsion and suspension.

Strong Practice Details:

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient widely utilizes valid and reliable observation tools to promote teaching practices that support social and emotional growth in children.
- The grant recipient consistently implements a supplemental evidence-based social and emotional curriculum or program.

Performance Area: Child Nutrition

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements nutrition services that accommodate children's unique nutritional needs.

Performance Area: Safe and Sanitary Environments

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient's facilities are safe.
- The grant recipient establishes safe environments through daily and ongoing oversight of facility, equipment, and material safety.
- The grant recipient staff engage in appropriate safety practices.
- Staff are observed engaging in appropriate hygiene practices.
- The grant recipient completes background checks prior to hire for all staff.
- The grant recipient establishes appropriate administrative safety practices and policies.
- The grant recipient's equipment, materials, and program environments are safe.
- The grant recipient establishes and follows emergency preparedness plans.

Performance Area: Expectant Families

Not applicable



Family and Community Engagement Services

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings, and additional feedback as applicable.

Performance Area: Program Foundations to Support Family Well-Being and Family Engagement

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- Staff are qualified, supported, and develop family assignments based on the specific needs of enrolled families.
- The grant recipient continuously engages all families in the program through open and effective communication.

Performance Area: Family Partnerships

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a family partnership process that includes supports for family-driven goals and progress towards outcomes.

Strong Practice Details:

During the review event the OHS monitoring team observed the following Strong Practice(s) in the Performance Area:

- The grant recipient provides economic mobility support to help families with pathways out of poverty.

Performance Area: Promoting Strong Parenting, Parent-Child Relationships, and Engagement in Children's Learning

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements strategies that promote parental skills and engage parents in children's development.
- The grant recipient chooses and implements a research-based parenting curriculum.

Performance Area: Community Partnerships

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has identified community partnerships that meet the needs and interests of families.



Fiscal Infrastructure

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings, and additional feedback as applicable.

Performance Area: Budget Development, Implementation, and Oversight

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient engages in a transparent, data-informed strategic process to develop and maintain a budget that aligns with program goals and circumstances.

Performance Area: Comprehensive Financial Management Structure and System

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient has implemented written procedures to ensure that only allowable costs are charged to the Head Start award in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award.
- The grant recipient maintains effective control over and accountability for all funds, property, and assets to avoid theft, fraud, waste, and abuse.
- The grant recipient implements a system for maintaining financial records and generating information needed to manage and safeguard Federal funds.

Performance Area: Facilities and Equipment Management Systems

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a system for ensuring compliance with requirements for the acquisition, record-keeping, insurance, and disposal of facilities purchased, constructed, or renovated (major renovations) with Head Start funds.
- The grant recipient implements a system for ensuring that equipment purchased with Head Start funds is acquired, used, and disposed of in accordance with requirements.
- The grant recipient assesses and mitigates risk and maintains property loss, casualty, and liability insurance consistent with the replacement value of property and determined risk of liability.



Eligibility, Recruitment, Selection, Enrollment, and Attendance

Below is a list of all Performance Areas and compliant Performance Measures monitored in this Content Area, with details on findings, and additional feedback as applicable.

Performance Area: Eligibility

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a clear, consistent, and compliant process for enrolling eligible families.
- The grant recipient trains staff to follow ERSEA regulations and establishes written policies and procedures to ensure compliance with eligibility requirements.

Performance Area: Recruitment

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient implements a recruitment strategy focusing on all families with eligible children, with specific outreach efforts to families with vulnerable children.

Performance Area: Selection

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient establishes selection criteria and a waitlist based on community needs.

Performance Area: Enrollment

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient fills at least 10 percent of the program's total funded enrollment with children eligible for services under the Individuals with Disabilities Education Act (IDEA).
- The grant recipient establishes practices to maintain full enrollment and accurately tracks current enrollment.

Performance Area: Attendance

Compliance Details

During the review event the OHS monitoring team identified the following Performance Measures as compliant:

- The grant recipient consistently employs strategies to encourage regular attendance.

----- End of Report -----