
	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 1</b>			
<b>SUBJECT</b>	Determining Community Strengths & Needs		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	2/17/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/25/22</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 2/24/22</b>
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**Policy:**

The Head Start Program, which includes both the Early Head Start (EHS) and Early Head Start-Child Care Partnership (EHS-CCP) programs, will perform a Community Assessment once over the five-year grant period with annual updates. Results from the Community Assessment will be used to ensure community strengths, needs, and resources are identified and adequately integrated. Results from the Community Assessment and updates will be analyzed, as required by Head Start Performance Standards.

Results from the Community Assessment will be used annually to reassess long and short-range objectives; program option and services provided; center locations; and criteria that assign priority to children and families.

The Community Assessment will include information related to:

- Number of children experiencing homelessness and foster care
- Availability of publicly funded full day pre-kindergarten
- Availability of early childhood programs in the community
- Availability of state and other publicly funded preschool
- Demographic data on Head Start eligible children and families
- Children with disabilities, including types of disabilities services
- Education, health, nutrition, and social service needs of Head Start eligible children and their families including prevalent social or economic factors impacting their well-being
- Typical work, school, and training schedules of parents with eligible children
- Child development, childcare centers, family childcare programs, publicly funded state and local preschools and approximate number of eligible children served
- Community resources and strengths



If resources are determined to be inadequate to meet the needs of the entire service area, the EHS program will request permission from the Federal Regional Office to revise the

recruitment area to select the areas that have the greatest need for EHS program services, as determined by the Community Assessment.

Community Assessments and all updates will be approved by the Head Start Policy Council and Governing Body Advisory Committee which holds responsibility of programmatic oversight as it reports to the City Council (Governing Body).

**Performance Standard:**

1302.11

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 2</b>			
<b>SUBJECT</b>	Eligibility		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/25/22</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 2/24/22</b>
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**Policy:**

The application process must be completed prior to determining a child's eligibility into the Early Head Start (EHS) Program, to include both the Early Head Start (EHS) and the Early Head Start – Childcare Partnership (EHS-CCP) programs and include requirements described in age, service area and income.



- **Age:**
  - A child must be an infant or toddler younger than three years old. A child may remain in EHS, following his or her third birthday, until he or she can transition into the DHS' Head Start Program. Children not transitioning into the DHS' Head Start Program may remain in the program until the end of the term.
- **Service Area:**
  - Children applying for the EHS-CCP program must reside or the parents/guardians work within the San Antonio or Edgewood Independent School Districts or qualify under the McKinney Vento Act.
  - Children applying for the EHS program must reside within the Edgewood Independent School District or qualify under the McKinney Vento Act.
- **Income:**
  - Family's income is equal to or below the 100 % poverty guideline: or
  - Family is eligible for, or in the absence of childcare would be potentially eligible for public assistance, including TANF child only payments; or
  - Children who are in foster/kinship care or children who are homeless are eligible for the EHS program regardless of income.
  - If a child moves from an EHS to a Head Start Program, the family's income must be re-verified.

- **Additional Allowances:**

- Families with an income at or below 130% of the *Federal Poverty Guidelines* *may be eligible* for enrollment in the Head Start Programs. The total number of families with income between 101%-130% of the *Federal Poverty Guidelines* *must not* exceed 35% of the total funded enrollment.
- Families with an income above 130% of the *Federal Poverty Guidelines* may be eligible for enrollment in the Head Start Programs. The total number of families with an income above 130% of the *Federal Poverty Guidelines* must not to exceed 10% of total funded enrollment. Children accepted above the 130% of the Federal Poverty Guideline must be approved by the grantee's administrator.

**Performance Standard:**

1302.12

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 3</b>			
<b>SUBJECT</b>	Training		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/26/21</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 3/25/21</b>
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**Policy:**

The Head Start Program will develop a system to provide training on Head Start and Early Head Start, to include both the Early Head Start and the Early Head Start – -Child Care Partnership eligibility, Head Start Program Performance Standards and ERSEA policies and procedures that include at a minimum the following:

- Annual training for Head Start Administrator, Directors, management staff, and any staff who determine Head Start eligibility
  - Methods on how to collect and complete eligibility documentation from families and third-party sources;
  - Strategies for treating families with dignity and respect and dealing with possible issues of domestic violence, stigma, and privacy; and,
  - Program policies, procedures, and actions taken against staff, families or participants who provide false information.
- Training for any staff member who determines Head Start eligibility within 90 days of hire
- Training for Governing Body and Policy Council members within 180 days of the beginning of a term
- Maintain all training records, including sign in sheets, agendas, and training materials

**Performance Standard:**

1302.12 (m) (1-4)

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 4</b>			
<b>SUBJECT</b>	Recruitment of Children		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/17/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/25/22</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 2/24/22</b>
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**Policy:**

The Early Head Start (EHS) Program, to include both the Early Head Start and the Early Head Start– Child Care Partnership (EHS-CCP) Programs and Child Care Service providers will actively locate and recruit families most in need of EHS services including children with disabilities, those who are experiencing homelessness, in foster care, children receiving Child Care Subsidies (for the EHS-CCP program), and other vulnerable children.

A recruitment plan will be developed each year and approved by the Head Start Policy Council and Governing Body Advisory Committee which holds responsibility of programmatic oversight as it reports to the City Council (Governing Body).

The EHS Program will publicize the recruitment areas to enhance the likelihood that eligible families and children will apply for the program.



Recruitment materials will be available in the applicant’s native language or where possible staff will be available to communicate with families in their native language.

The EHS program must maintain a tracking system for recruitment and report on all recruitment efforts.

**Performance Standard:**

1302.13

**Head Start Act:** Sec. 642 (b)(11)

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 5</b>			
<b>SUBJECT</b>	Selection		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	2/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/25/22</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 2/24/22</b>
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**Policy:**

The Early Head Start (EHS) Program, to include both the Early Head Start and the Early Head Start – Child Care Partnership (EHS-CCP) Programs will select children and families with the most need for Head Start services, without regard for race, gender, disability, or creed in accordance with Head Start Performance Standards, Head Start Act and the DHS Head Start Program ERSEA policies.

If a child is declared eligible, his or her selection will be based on points received from the Selection Criteria Point System which is developed from the Community Assessment and approved by the Policy Council and Governing Body Advisory Committee which holds responsibility of programmatic oversight as it reports to the City Council (GoverningBody).

At the beginning of each enrollment year, eligible children will be placed on a waiting list and prioritized according to the Selection Criteria Point System. A minimum of two separate selection events must occur. Selections must not exceed 90% of funded enrollment during the first selection event. A waiting list must continue to be maintained throughout the program year to ensure the children with the most need are selected for the program as slots become available. Selections must be conducted using the following waitlist priorities:

- **Income Eligible on the waitlist from 0% - 100%**
  - Using the waitlist, developed by the point system, EHS program will first select only children whose family income is at or below 100% of the Federal Poverty Guideline or those who are eligible for or, in the absence of childcare, would be potentially eligible for public assistance; or children who are homeless or in foster care.
- **Income Eligible on the waitlist from 101%-130%**
  - EHS may select up to 35% of families who do not meet the Income Eligible criteria above. These selections may occur after demonstrating all income eligible children, families eligible for or in the absence of childcare, would be potentially

eligible for public assistance, children who are homeless, in foster care, and children with disabilities on the waitlist have been selected.

- **Over Income on the waitlist 131% and above**
  - EHS must receive approval from the DHS Head Start Program Administrator prior to selecting an over income child unless the child has a current IFSP. Total participants accepted for this selection must not exceed 10% of the program funded enrollment. Excluding this priority, the EHS program may select over-income children after demonstrating they have conducted outreach and exhausted all resources to enroll income eligible children, families eligible for or in the absence of childcare, would be potentially eligible for public assistance, children who are homeless or in foster care.

#### **Selection Exceptions:**

- **Children with Disabilities-** To comply with Head Start's requirement of having 10 percent of actual enrollment be children with an identified disability or delay, the program must give priority to children with a suspected disability or delay as identified by Part C of IDEA program during the selection process. This priority stays in effect until 12 percent of enrolled children are children with disabilities or delays and will be granted as follows:
  1. Income eligible children from 0-100% Federal Poverty Guideline with a current Individualized Family Service Plan (IFSP)
  2. Income eligible children from 101 – 130% Federal Poverty Guideline with a current Individualized Family Service Plan (IFSP)
  3. Over income children from 131% and above Federal Poverty Guideline with a current Individualized Family Service Plan (IFSP)



All, IFSPs and letters from licensed professionals must be reviewed and verified by the EHS Disability Coordinator. All supporting documentation must be scanned and attached in Child Plus.

- **Income Eligible child receiving Child Care Subsidies (CCS)** (101 – 130% Federal Poverty Guideline)- exclusive to the EHS-CCP program.
- **Tiebreaker** - In cases where families have the same point total for the same slot, priority will be given to the younger child.

#### **Performance Standard:**

1302.14





	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 6</b>			
<b>SUBJECT</b>	Eligibility and Determination Records		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/26/21</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 3/25/21</b>
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**Policy:**

The Early Head Start Program, to include both The Early Head Start and the Early Head Start – Child Care Partnership Program and Child Care Service Providers must maintain eligibility determination records for any child enrolled in the program. All records must be kept for a minimum of five years after a child is no longer enrolled in the program.

**Performance Standard:**

1302.12 (k)(1-3)

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 7</b>			
<b>SUBJECT</b>	Violation of Eligibility Determination Regulations		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	2/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/26/21</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 3/25/21</b>
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**Policy:**



The Early Head Start (EHS) to include both The Early Head Start and the Early Head Start – Child Care Partnership (EHS-CCP) Program must develop procedures to address the violation of eligibility determination regulations that include, at a minimum, the following:

- Consequences for staff violating Federal and program eligibility determination regulations.
- Consequences for staff enrolling a child ineligible to receive EHS or Head Start Services.
- Consequences for parents providing false information or documentation, including possible removal from the program.
- Actions against staff who intentionally violate federal and program eligibility determination regulations.

On an annual basis staff must complete an Acknowledgment of Eligibility Regulations form.

**Performance Standard:**

1302.12 (L)

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 8</b>			
<b>SUBJECT</b>	Enrollment		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	2/01/2017		
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**Policy:**

All application forms must be completed, and all necessary documents obtained prior to enrollment of a child in Early Head Start (EHS) program, to include both the Early Head Start and the Early Head Start – Child Care Partnership (EHS-CCP) programs.



**Each childcare service provider will be fully enrolled within 30 days of program start date. Enrollment opportunities must be filled within 30 days.**

If a child is determined eligible and is enrolled in the EHS program, he or she remains eligible while participating in the program.

EHS may reserve slots for children experiencing homelessness and children in foster care when a vacancy occurs. No more than three percent of funded enrollment slots may be reserved.

**Performance Standard:**

1302.15

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 9</b>			
<b>SUBJECT</b>	Attendance		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/26/21</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 3/25/21</b>
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**Policy:**

The Early Head Start (EHS) Program, to include both the Early Head Start center-based and the Early Head Start – Child Care Partnership (EHS-CCP) programs will ensure daily attendance is recorded in the Child Plus data entry tracking system.

- EHS must implement a process to attempt to contact the parent/guardian for any unexpected absences to ensure the child’s well-being.
- EHS program will provide support efforts to promote the child’s regular attendance.
- EHS program will emphasize and provide information to promote the benefits of regular attendance, support families to address barriers preventing regular attendance, and assist families with referrals for services that will enhance attendance.
- EHS program will conduct a home visit or other direct contact with child’s parent/guardian if child has two consecutive unexplained absences.
- Within the first 60 days of the program year and thereafter, the EHS program must conduct an analysis utilizing individual child attendance data to identify children at risk of missing 10% of program days per year. The EHS program must then identify reasons for absenteeism and develop strategies to improve attendance of children at risk. Strategies may include direct contact with parents or intensive case management. All efforts and contact with parents must be documented in Child Plus.
- In circumstances where chronic absenteeism persists and the program has made appropriate efforts to reengage the family and attendance does not improve, the child’s slot may be then considered vacant with the Head Start Administrator’s authorization.

When the monthly average daily attendance rate falls below 85%, the EHS- program must analyze the causes of absenteeism and determine the systematic issues contributing to the program's absentee rate. A process must be implemented, utilizing absenteeism data, to identify program strengths and needs and implement a plan to continuously evaluate compliance of performance standards.

The EHS program must support homeless eligible children by allowing attendance up to 90 days, or as allowed under state licensing requirements, without immunization and other records. Programs must give families reasonable time to present documents and work with families to obtain immunizations to comply with state requirements.

The EHS- program must utilize community resources, where possible, to provide transportation to homeless children experiencing absenteeism due to transportation to and from their childcare center.

### **EHS Home-Based Program**

Attendance is viewed as a family's participation in a home visit with a designated Home Visitor.



Children enrolled in the home-based option will have a minimum of 46 home visits during the program year.

The EHS program will make up planned home visits that are canceled by the program, and to the extent possible, attempt to make up planned home visits cancelled or missed by the family.

Medical or social service appointments may not replace planned group socializations activities or home visits.

### **Performance Standard(s):**

1302.16 (a)(1-3)(b); 1302.102 (b-c)



	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 10</b>			
<b>SUBJECT</b>	Suspension and Expulsion		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/25/22</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 2/24/22</b>
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**Policy:**

The Early Head Start (EHS) Program, to include both the Early Head Start and the Early Head Start– Child Care Partnership (EHS-CCP) programs prohibits Child Care Service Providers from suspending, expelling, or un-enrolling a child from an EHS program due to a child’s behavior. Exceptions to this policy may be considered on a case- by- case basis. Consultation with the Grantee’s Mental Health Coordinator, Education Coordinator, in collaboration with the parents, must be conducted to determine if the child’s enrollment presents a safety threat to the child or other enrolled children. Other community resources should be considered if appropriate. Exceptions must be submitted to the Head Start Administrator and approved prior to any action.

**Performance Standard:**

1302.17 (a) (b)

	<b>DHS Early Head Start Program Policy</b>		
<b>ERSEA 11</b>			
<b>SUBJECT</b>	Policy on Fees		
<b>REFERENCE</b>	Eligibility, Recruitment, Selection, Enrollment, and Attendance		
<b>EFFECTIVE</b>	02/01/2017		
<b>Policy Council Approval: 1/24/17</b>	<b>Policy Council Revision: 1/25/22</b>	<b>Governing Body Approval: 2/20/17</b>	<b>Governing Body Revision: 2/24/22</b>
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**Policy:**

The Early Head Start (EHS) Program, to include both The Early Head Start and the Early Head Start – Child Care Partnership (EHS-CCP) Programs does not charge any fees for participation in the program. EHS Child Care Service Providers may not request parents to provide any supplies, materials, money, or other items including snacks for special celebrations or events. Teachers may accept donations for special celebrations or events but cannot exclude a child's participation of events contingent on donations.

Child Care Service Providers may charge a parent fee to those participants who are dually enrolled in the Child Care Subsidies (CCS) program as set by the CCS program. The family's ability to pay the CCS copayment must not affect their participation in the EHS-CCP program.

**Performance Standard:**

1302.18