
	DHS Head Start Program Policy		
PDM 1			
SUBJECT	Program Monitoring		
REFERENCE	Program Design and Management		
EFFECTIVE	5/11/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 5/24/22	Governing Body Approval: 9/28/17	Governing Body Revision: 8/4/22
PAGE: 1 of 3			

Policy:

The Head Start Program will develop and implement a process of ongoing monitoring and continuous improvement of the service delivery and program operations. The Head Start Program, including the Head Start Grant Recipient and Education Service Providers will abide by all local, state, and federal regulations. The Head Start Program will provide high-quality program services, share strategies, and communicate plans to ensure child and adult safety.

The Head Start Program will use the following monitoring systems:

- Education Service Provider level monitoring system for ongoing monitoring to include regular site visits to all Head Start sites and classrooms
- Site visits to all Head Start centers will be announced and unannounced
- City level monitoring system that ensures Education Service Providers have effective oversight of service delivery systems and remain in compliance with all local, state, and federal regulations
- Utilization of ChildPlus to collect and record information about children and families for data analysis, evaluation, and program improvement
- Collaborative review of program information for planning and future development
- Annual Self-Assessment
- Managed by Information (MBI) Reporting
- Content Area Data Reports

The Head Start Grant Recipient Responsibilities:

Develop procedures for ongoing monitoring. These procedures will provide guidance and expectations of how Education Service Providers will be monitored. These procedures will also include the requirements for reporting findings.

- Establish a monitoring model that will help ensure timely and effective delivery of

services and provide content area expertise and support to the Education Service Providers.

- Focus on direct monitoring, reviewing, and validating the results of Education Service Providers monitoring activities.
- Monitor required program tasks and responsibilities to ensure completion within required timelines and according to guidelines provided in the Head Start Program Performance Standards, local, state, and federal regulations.

Monitoring of the Head Start Program is a continuous process, and all findings are shared with the Head Start Administrator to determine the level of compliance with the Head Start Program Performance Standards, local, state, and federal regulations. The results of ongoing monitoring will be shared with the Head Start Administrator, Leadership Team, Management Team, Education Service Providers, and the governing body and the Policy Council.

- Follow up on monitoring issues or concerns to ensure corrections and implementation of corrective actions plans. The Head Start Grant Recipient may provide training, technical assistance, and resources to assist the Education Service Providers in developing and implementing a corrective action and quality improvement plan.
- Establish an annual monitoring calendar of monitoring activities and will share with the Education Service Providers.
- With the participation of stakeholders, Head Start parents, Policy Council members, Governing Body members, community members, and program staff, The Head Start Grant Recipient will conduct the Annual Self- Assessment by utilizing program data. The results will be shared with all stakeholders.
- Monitoring of the Head Start Program is a continuous process, and all findings are shared with the Head Start Administrator to determine the level of compliance with the Head Start Program Performance Standards, local, state, and federal regulations. The results of ongoing monitoring will be shared with the Head Start Administrator, Leadership Team, Management Team, Education Service Providers, and the governing body and the Policy Council.

Education Service Provider Responsibilities:

Establish their own monitoring systems in accordance with Head Start Program Performance Standards and policies, to include the following:

- Developing and implementing procedures for ongoing monitoring
- Submitting an annual monitoring calendar to the Head Start Grant Recipient
- Taking corrective action
- Requesting assistance from the Head Start Grant Recipient when needed
- Reporting the results of monitoring to the Head Start Grant Recipient
- Implementing a corrective action plan that prevents reoccurrence of previous findings

Education Service Providers will develop and implement a procedure to monitor and report results in the following areas:

- Education Services
- ERSEA
- Health/Dental Services
- Nutrition
- Disabilities
- Mental Wellness Support Services
- Family & Community Support Services
- Transportation
- Environmental Health and Safety
- Human Resources

Education Service Providers will utilize their internal monitoring systems, to include ChildPlus, to document all results. Upon request by the Head Start Grant Recipient all monitoring documents must be made available within reasonable time.

Education Service Provider Corrective Action:



Following the receipt of results from a monitoring project completed by the Head Start Grant Recipient, the Education Service Providers will:

- Complete all Corrective Action Plans (CAPs) in ChildPlus based on set deadlines established by the Head Start Recipient
- Address any finding related to child health and safety that is an immediate threat within 24 hours
- Develop quality improvement plans as requested by the Head Start Grant Recipient

The Education Service Provider may request an extension prior to the initial deadline along with justification if they are unable to meet the deadline for the completion of a CAP. The Special Projects Manager over City Monitoring or Head Start Administrator may give permission and/or add provisions related to the CAPs and approve as needed.

Performance Standard(s):

Subpart J- Program Management and Quality
Improvement 1302.100 – 1302.103 (a-b)

	DHS Head Start Program Policy		 HEAD START City of San Antonio Department of Human Services
PDM 2			
SUBJECT	Standards of Conduct		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 5/24/22	Governing Body Approval: 9/28/17	Governing Body Revision: 8/4/22
PAGE: 1 of 1			

Policy:

The Head Start Program staff, including substitutes, consultants, contractors, and volunteers must abide by the program’s Standards of Conduct that:



- a. Ensure staff, including substitutes, consultants, contractors, and volunteers implement positive strategies to support children’s well-being and prevent and address challenging behavior;
- b. Ensure staff, including substitutes consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not:
 - i. Use corporal punishment;
 - ii. Use isolation to discipline a child;
 - iii. Bind or tie a child to restrict movement or tape a child’s mouth;
 - iv. Use or withhold food as a punishment or reward;
 - v. Use toilet learning/training methods that punish, demean, or humiliate a child;
 - vi. Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child;
 - vii. Physically abuse a child;
 - viii. Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child’s family; or,
 - ix. Use physical activity or outdoor time as a punishment or reward;
- c. Ensure staff, including substitutes consultants, contractors, and volunteers respect and promote the unique identity of each child and family and do not stereotype on any basis, including gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition;

- d. Require staff, including substitutes consultants, contractors, and volunteers to comply with program confidentiality policies concerning personally identifiable information (PII) about children, families, and other staff members in accordance with subpart C of part 1303 and applicable federal, state, local, and tribal laws; and,
- e. Ensure no child is left alone or unsupervised by staff, consultants, contractors, or volunteers while under their care.

Furthermore, all staff, consultants, contractors, volunteers, Head Start Policy Council members, and Advisory Committee members are required to sign a Standards of Conduct form. The Head Start Program will implement appropriate penalties including termination of staff, consultants, and volunteers who violate the Standards of Conduct.



Performance Standard(s):

1302.90(c)(1); 1303(C)

	DHS Head Start Program Policy		 HEAD START City of San Antonio Department of Human Services
PDM 3			
SUBJECT	Staff Performance Appraisals		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 4/23/19	Governing Body Approval: 9/28/17	Governing Body Revision: 5/23/19
PAGE: 1 of 1			

Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will follow their agency or school district guidelines concerning staff performance appraisals. At a minimum, all Head Start employees are required to have an annual performance review conducted and on file. The results of these reviews will be used to identify staff training, professional development needs, modify staff performance agreements, as necessary, and assist each staff member in improving their skills and professional competencies.

	DHS Head Start Program Policy		
PDM 4			
SUBJECT	Training and Professional Development		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 2			

Policy:

The Head Start Program will ensure all new staff, consultants, and volunteers receive at a minimum, an orientation that includes the goals and underlying philosophy of Head Start including the Head Start Program Performance Standards, regulations, policies, and procedures.

The Head Start Program must provide appropriate training and technical assistance to include orientation to the governing body, advisory committee, and policy council. The training must include review of program governance and eligibility verification indicated in 1302.12(m). This is to ensure the staff and governing body members understand the information and can effectively oversee the direction of the Head Start Program.

Additionally, the Head Start Program will develop and implement procedures for staff training and professional development designed to assist staff in acquiring or increasing the knowledge and skills needed to provide high-quality, comprehensive services. At a minimum, the procedures must include:



- a. Staff completing a minimum of 15 clock hours of professional development per year. For teaching staff, such professional development must meet the requirements described in section 648A(a)(5) of the Act;
- b. Training on methods to handle suspected or known child abuse and neglect cases, that comply with applicable federal, state, local, and tribal laws;
- c. Training for child and family services staff on best practices for implementing family engagement strategies in a systemic way;
- d. Training for child and family services staff, including staff that work on family services, health, and disabilities, that builds their knowledge, experience, and competencies to

improve child and family outcomes. All teaching staff assigned to a co-teach classroom must receive training specific to the co-teach model; and,

- e. Research-based approaches to professional development for education staff, that are focused on effective curricula implementation, knowledge of the content in Head Start Early Learning Outcomes Framework: Ages Birth to Five, partnering with families, supporting children with disabilities and their families, providing effective and nurturing adult-child interactions, supporting dual language learners as appropriate, addressing challenging behaviors, preparing children and families for transitions, and use of data to individualize learning experiences to improve outcomes for all children.
- f. Mental health and wellness information available to staff regarding health issues that may affect their job performance. The program must provide regularly scheduled opportunities to learn about mental health, wellness, and health education.

Performance Standard(s):

1301.5; 1302.12(m); 1302.92(a-b); 1302.93(b)

	DHS Head Start Program Policy		
PDM 5			
SUBJECT	Harassment and Discrimination		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 1			



Policy:

The Head Start Program will maintain a work environment free from sexual and other unlawful harassment and discrimination. Discrimination based on race, creed, color, national origin, sex, age, religion, or ethnic group, sexual orientation, gender identity, gender expression, political affiliation, or belief, genetic information, or disability, or veteran status will not be tolerated.

Additionally, the Head Start Program is governed by all existing agency, state and federal policies prohibiting unlawful harassment, in any form and discrimination on any basis.

Performance Standard:

CFR 45 Part 80; 45 CFR part 84 Sec. 654. NONDISCRIMINATION PROVISIONS; American with Disabilities Act (ADA); Age Discrimination in Employment Act (ADEA)

	DHS Head Start Program Policy		
PDM 6			
SUBJECT	Staff Qualifications and Competency Requirements		
REFERENCE	Program Design and Management		
EFFECTIVE	9/13/2011		
Policy Council Approval: 7/25/17	Policy Council Revision: 5/24/22	Governing Body Approval: 9/28/17	Governing Body Revision: 8/4/22
PAGE: 1 of 2			

Policy:

The Head Start Program will ensure all staff, including substitutes, consultants, and contractors have sufficient knowledge, training, and experience, and receive ongoing training and professional development to fulfill their roles and responsibilities, and meet the following criteria:

A. Early Head Start or Head Start director

- i. At a minimum, a baccalaureate degree;
- ii. Experience in supervision of staff, fiscal management, and administration.

B. Fiscal Officer

- i. At a minimum, a baccalaureate degree in accounting, business, fiscal management, or a related field;
- ii. Certified Public Accountant.

C. Child and Family Services Management Staff

i. Family, Health, and Disabilities Management

- a. At a minimum, a baccalaureate degree, preferably related to one or more of the disciplines they oversee.

ii. Education Management

- a. A baccalaureate or advanced degree in early childhood education; or
- b. A baccalaureate or advanced degree and equivalent coursework in early childhood education with early childhood education teaching experience.

D. Child and Family Services Staff

i. Early Head Start Teacher

- a. Child Development Associate (CDA) credential for Infant and Toddler; or

- b. Comparable credential and have been trained with a focus on infant and toddler development or;
- c. Equivalent coursework in early childhood development with a focus on infant and toddler development that meets or exceeds the CDA.

ii. Head Start Teacher

- a. A baccalaureate or advanced degree in child development, early childhood education or equivalent coursework;
- b. A baccalaureate or advanced degree and coursework equivalent to a major relating to early childhood education, with experience teaching early childhood education.
 - I. The Head Start Program recognizes licenses or certifications that qualify teachers to teach pre-school aged children within the State of Texas.

iii. Head Start Teacher Assistants

- a. Child Development Associate (CDA) credential or enrolled in a program to be completed within two years of hire; or
- b. Technical Certificate in Early Childhood Studies or Early Childhood Development that meets or exceeds the requirements for a CDA Credential; or
- c. Associate or baccalaureate degree (in any area) or be enrolled in a program that will lead to degree within two years of hire.

iv. Family Support Workers

- a. Must have within eighteen months of hire, at a minimum, a credential or certification in social work, human services, family services, counseling or a related field.

E. Health Professionals

- a. Health procedures must only be performed by a licensed or certified health professional.
- b. All mental health consultants must be licensed or certified mental health professionals. Programs must use mental health consultants with knowledge of and experience in serving young children and their families.
- c. Staff or consultants who support nutrition services must be registered dietitians or nutritionists with appropriate qualifications.

F. Instructional Coaches



- a. Minimum of a baccalaureate degree in early childhood education or a related field.

Performance Standard(s):

1302.91(a-d); 1302.92(c-d)

Head Start Act:

645A(h); Sec 648 A (a)(1-3)

	DHS Head Start Program Policy		
PDM 7			
SUBJECT	Identification and Reporting of Child Abuse and Neglect		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 5/24/22	Governing Body Approval: 9/28/17	Governing Body Revision: 8/4/22
PAGE: 1 of 2			

Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, must develop and implement procedures to respond to suspected or known child abuse whether it occurs at or away from the program.

All Head Start Program Staff, including teachers, teacher assistants, and all other campus or site personnel, consultants, and volunteers must follow the Education Service Provider policies and procedures regarding child abuse and neglect.

The Head Start Program Administrator must be notified within 24 hours of an incident that has occurred within the Head Start Program. The Head Start Administrator must also be notified of any report that has been made for suspected child abuse or neglect occurring away from the Head Start Program within 24 hours of notification. Such official incident reporting must be provided in writing.

Additionally, when any Head Start Program Staff, contractors, Education Service Providers, Child Care Center staff, or volunteers witness or suspect child abuse or neglect, they must make a report to the Texas Department of Family and Protective Services (TDFPS) within 48 hours. According to the State of Texas, Title 5, Chapter 261 of the Family Code, “child abuse is an act or omission that endangers or impairs a child’s physical, mental or emotional health and development.” Child abuse may take several forms including, but not limited to:

- Physical, mental, or emotional injury
- Sexual abuse
- Sexual exploitation
- Physical neglect
- Medical neglect
- Inadequate supervision

In filing a report, personnel will follow state regulations regarding the timeframes that reports must be made, the information that must be reported, and confidentiality of reported information.

Education Service Providers will develop and implement procedures to notify the parents/guardians of any suspected or known child abuse incidents occurring within the Head Start Program.

Should Education Service Provider management be informed that a report has been made for suspected child abuse or neglect occurring outside the Head Start Program, they must comply with notification requirements outlined in this policy.



All Head Start staff, including teachers, teacher assistants, and all other campus or site personnel, substitutes, consultants, and volunteers receive annual training on procedures for identifying and reporting child abuse or neglect. Head Start staff are expected to fully cooperate with TDFPS and other applicable agency personnel to report any suspected or known incidents.

Performance Standard(s):

1302.47(b)(4)(i)(K); 1302.47(b)(5)(i); 1302.53(a)(2)(iii); 1302.90(b)(2); 1302.92(b)(2); 1302.102(d)(1)(ii)(A); 1303.22(c)(5)(iii); 1303.22(c)(8)

Office of the Texas Attorney General, "What Can We Do about Child Abuse Part 2":
https://www.texasattorneygeneral.gov/ag_publications/txts/childabuse2.shtml

Family Code, Chapter 261. Investigation of Report of Child Abuse or Neglect
<http://www.statutes.legis.state.tx.us/Docs/FA/htm/FA.261.htm>

	DHS Head Start Program Policy		
PDM 8			
SUBJECT	Community Complaints		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 4/23/19	Policy Council Revision: 5/24/22	Governing Body Approval: 8/13/20	Governing Body Revision: 8/4/22
PAGE: 1 of 2			

Policy:

The Head Start Program encourages a climate of open communication between parents, program employees, and community members. Head Start and Education Service Provider staff are available to provide support and to assist any parent or community resident who has a complaint, problem, or concern.



Parents/guardians and community residents are encouraged to attempt to resolve Head Start complaints, problems, or concerns at the center/school level by talking to a teacher, Family Support Worker, center director or principal. Parent/Guardians may at any time also talk directly to any Head Start staff member or Head Start Administrator about any issues or concern. Concerns/complaints may also be submitted using the comment section of the Head Start website at www.saheadstart.org.

If attempts to informally resolve the concern/problem are not successful, the following formal steps may be taken:

1. Call, email, meet with, or provide a written statement to the Head Start Education Service Provider Director. The Director will provide the parent/guardian or community resident a recommendation for resolution of the concern/problem within five business days of receipt of the issue. The Director may request additional time if required to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 2.
2. Call, email, meet with, or provide a written statement to the City of San Antonio Head Start Program Administrator. The Head Start Administrator will have five business days to resolve the concern/problem. The Head Start Administrator may request additional time to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 3.

3. Call, email, meet with, or provide a written statement to the Department of Human Services (DHS) Head Start Policy Council. The DHS Head Start Policy Council will have fifteen business days to resolve the concern/problem. The DHS Head Start Policy Council may request additional time to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 4.) Head Start Policy Council. The DHS Head Start Policy Council will have fifteen business days to resolve the concern/problem. The DHS Head Start Policy Council may request additional time to resolve the concern/problem. If not resolved, parents/guardians or community resident may proceed to Step 4.

4. Submit a signed, written statement to the City of San Antonio City Council's Governing Board/ Advisory Committee. The statement shall describe in detail the complaint, problem or concern and steps taken to resolve the issue. The City of San Antonio City Council's Governing Board/ Advisory Committee will provide a written response within 15 business days of receipt of the written statement. The City of San Antonio City Council's Governing Board is the last formal step in resolving parent/community resident complaints or concerns and the resolution is final.

	DHS Head Start Program Policy		
PDM 9			
SUBJECT	Critical Incident Reporting		
REFERENCE	Program Design and Management		
EFFECTIVE	12/13/2011		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 1			

Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will develop and implement procedures for Critical Incident Reporting (CIR). All staff must be trained on incident reporting.



A critical incident includes, but is not limited to:

- Suspected child abuse which may or may not have occurred during Head Start hours.
- Allegations of child abuse/neglect against any Head Start staff member, volunteer, or contractor
- Incidents which may have placed a child, family member, or staff in danger, including any incidents in which a child was left unsupervised.
- Health incidents and illnesses, which include, but are not limited to:
 - Injuries that require urgent medical attention by a health-care professional.
 - Child or staff member leaving by emergency medical transport.
 - Contagious diseases that could lead to an outbreak.
 - Child receiving outside medical attention at any point in time for an injury sustained during Head Start program hours.
- Any incident which has the potential to generate negative media coverage.
- Any media inquiry/ coverage of the program.
- Unplanned interruption in Head Start Program services.
- Closure of any facility or part of a facility, including outdoor play areas.
- Accidents involving vehicles that transport children and families.

When applicable, parents/guardians must be notified of critical incidents within 24 hours of occurrence. Education Service Providers must also provide notification to the Head Start Administrator or designee within 24 hours.

Performance Standard(s):

1302.47(c); 1302.102(d)(1)(ii); 1304.12; 1303.79(b)(3)

	DHS Head Start Program Policy		
PDM 10			
SUBJECT	Personnel		
REFERENCE	Program Design and Management		
EFFECTIVE	3/13/2012		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 2			

Policy:

The Head Start Program and Education Service Providers will abide by their internal agency personnel policies and procedures which must meet or exceed applicable requirements including Head Start regulations as well as local, state, and federal laws.

The City of San Antonio Head Start Program personnel policies must be approved by the Governing Board, or the designated CoSA Advisory Committee, and Policy Council and must be available to all staff. The Head Start Policy Council will approve decisions regarding the employment of program staff as stated in paragraph 1(E)(iv)(IX), regarding the hiring, evaluation, compensation, and termination of the Executive Director, Head Start Director, and any other person in an equivalent position within the Head Start Program.

The Head Start Program collaborates with the City of San Antonio’s Human Resources Department to ensure all newly hired City staff complete the required criminal background checks prior to employment. According to the City of San Antonio’s Administrative Directive (AD) 4.55, the City conducts Criminal Background Checks (CBC) as part of the initial employment process and applies to volunteers and interns.

Head Start Program and Education Service Provider Background Check Requirements:

- a. Before a person is hired, directly or through a contract, including transportation staff and contractors, the Head Start Program and Education Service Providers must conduct an interview, verify references, conduct a sex offender registry check, and obtain one of the following:
 - i. State or tribal criminal history records, including fingerprint checks; or,
 - ii. Federal Bureau of Investigation criminal history records, including fingerprint checks.

- b. A program has 90 days after an employee is hired to complete the background check process by obtaining:
 - i. Whichever check listed in paragraph (a) of this section was not obtained prior to the date of hire; and,
 - ii. Child abuse and neglect state registry check, if available.
- c. A program must review the information found in each employment application and complete background check to assess the relevancy of any issue uncovered by the complete background check.
- d. A program must ensure a newly hired employee, consultant, or contractor does not have unsupervised access to children until the background check process is complete.
- e. A program must conduct the complete background check for each employee, consultant, or contractor at least once every five years and must include each of the four checks listed above.

The Head Start Program will consider current and former program parents for employment vacancies for which such parents apply and are qualified.

Performance Standard(s):



1302.90(a-b)

Head Start Act:

642(c)(1)(E)(iv)(V)(cc); 642(c)(1)(E)(IX); 642(c)(2)(D)(vi)

City of San Antonio Administrative Directive (AD):

4.55 Background Checks/Reporting Arrests, Indictments and Convictions

	DHS Head Start Program Policy		
PDM 11			
SUBJECT	Program Governance		
REFERENCE	Program Design and Management		
EFFECTIVE	3/13/2012		
Policy Council Approval: 7/25/17	Policy Council Revision: 11/19/19	Governing Body Approval: 9/28/17	Governing Body Revision: 1/16/20
PAGE: 1 of 1			

Policy:



The City of San Antonio Head Start Program (Program) has established a formal structure for program governance: the City of San Antonio City Council is the Governing Body, and the Head Start Policy Council (Policy Council) is a body of elected parents of currently-enrolled children and elected members of the community. City Council approves or disapproves legal and fiscal matters pertaining to the Head Start grant and oversees the Program. City Council has authorized subcommittees to oversee key responsibilities related to program governance and improvement of the Program. The Policy Council allows for parent participation in policy-making and other decisions about the program, as statutorily required by the Head Start Program Performance Standards and Section 642 (c) of the Head Start act.

In addition, the Program will establish parent committees exclusively of parents of currently-enrolled children to advise staff and the Policy Council.

Regulations:

Head Start Program Performance Standards Sec. 1301

Head Start Act of 2007 Sec. 642(c)(1)\ and Sec. 642(c)(2)

	DHS Head Start Program Policy		
PDM 12			
SUBJECT	Impasse		
REFERENCE	Program Design and Management		
EFFECTIVE	4/13/2010		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 1			

Policy:

To facilitate meaningful consultation and collaboration about decisions of the Governing Board, CoSA Advisory Committee, and the Head Start Policy Council (HSPC), written impasse procedures is established for resolving internal disputes in a timely manner. These procedures meet the requirements established in the Head Start Program Performance Standards.



This policy, detailed further in the Impasse Procedure, seeks to ensure that matters of internal dispute are resolved in a respectful, professional, and timely manner to safeguard the integrity and continued funding and operation of the Head Start Program.

Performance Standard:

1301.6

Head Start Act:

642(d)(1)

	DHS Head Start Program Policy		
PDM 13			
SUBJECT	Confidentiality		
REFERENCE	Program Design and Management		
EFFECTIVE	10/15/2013		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 1			

Policy:

The Head Start Program is committed to ensuring the security and confidentiality of personnel, children, and family information. The Head Start Program, including the Head Start Grant Recipient and Education Service Providers must establish data management procedures on the effective use and sharing of data in accordance with the Head Start Program Performance Standards.

Confidentiality requirements include, but are not limited to, the following:

- a) Physical and electronic records are secure;
- b) Only authorized staff members may access personnel, child, and family information;
- c) Staff members share child information on a need-to-know basis;
- d) Written consent from the Parent/guardian is required prior to the release of any individual child or family records.
- e) Staff is trained on how to maintain confidentiality;



Only information that is essential to provide services is recorded and maintained for any child enrolled in the Head Start Program. Parents/guardians are the primary source of information about themselves, and any information sought from them is limited to that which is essential for services.

The sharing of information with community partners is encouraged only if it improves service delivery and is done in accordance with this confidentiality policy. Sharing of information with outside agencies for purposes other than coordination of services must be pre-approved by the Head Start Program Administrator.

Confidentiality must be maintained in accordance with this policy, local, state, and federal requirements.

Performance Standard(s):

1302.22; 1302.101(b)(4); 1303.20

	DHS Head Start Program Policy		
PDM 14			
SUBJECT	Research Studies with Head Start Families		
REFERENCE	Program Design and Management		
EFFECTIVE	10/15/2013		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/25/17	Governing Body Approval: 9/28/17	Governing Body Revision: 9/28/17
PAGE: 1 of 1			

Policy:

The Head Start Program must follow the established guidelines for research study requests involving Head Start children and families.



A written request must be provided to the Head Start Grant Recipient for approval when a request to support a research study involves children and families enrolled in the Head Start program and/or involves secondary Head Start data (research collected by the Head Start program for another purpose). This request must include assurances that the study will be conducted in compliance with the Head Start Program Confidentiality policy, 45 CFR 46 and 45 CFR 46 Subpart D (additional protections for children) and include the following basic elements:

- Person or entity conducting the study
- Type of research study
- Title of project
- Timeframe for study
- Proposed subjects
- Methodology and data collection
- Purpose of study and use of information collected
- Method to obtain parental permission and child’s agreement (if applicable) unless a waiver has been granted by an Institutional Review Board (IRB) or other agency in accordance with section 46.116 (c) or 46.116 (d) of 45 CFR 46
- How anonymity and confidentiality of subjects will be maintained
- Documentation of agency approval and approval by an IRB, if applicable

The Head Start Grant Recipient has a right to review and edit documentation prior to publication. At the conclusion of the project, anticipated dates of publication will be provided to the grantee as well as a copy of all published reports.

Related Regulations:

45 CFR 46; 45 CFR 46 Subpart D

	DHS, Head Start Program Policy		
PDM 15			
SUBJECT	Staff Health Requirements		
REFERENCE	Program Design and Management		
EFFECTIVE	6/15/2011		
Policy Council Approval: 7/25/17	Policy Council Revision: 1/25/22	Governing Body Approval: 9/28/17	Governing Body Revision: 2/24/22
PAGE: 1 of 1			

Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will develop and implement procedures requiring identified program staff to submit a copy of their most recent physical exam or approved health document within 30 business days of hire to ensure that staff do not pose a significant risk to the health or safety of others in the program. The annual/physical exam or approved health document must not be more than 12 months old and must include appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

Every five years after the initial hire date, staff must submit a copy of their most recent physical exam or approved health document. The physical exam or approved health document must not be more than 12 months old and must include appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will develop and implement procedures to ensure regular volunteers complete appropriate screenings or tests for Tuberculosis or other communicable diseases as recommended by a healthcare professional.

The following requirement regarding vaccines is pending final action and/or court ruling as of December 31, 2021:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will develop and implement procedures to ensure compliance with the Federal Law requiring all staff, volunteers, and contractors, whose activities involve contact with or provide direct services to children and families, to be fully vaccinated from COVID-19.



The Head Start Program will develop and implement procedures related to COVID-19 Vaccine exemptions and testing requirements. Staff may request an exception from this mandatory vaccination requirement if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Staff also may be legally entitled to a reasonable accommodation if they cannot be vaccinated because of a disability, or if the provisions in this policy for vaccination, conflict with a sincerely held religious belief, practice, or observance.

Anyone for whom a vaccine is medically contraindicated; for whom medical necessity requires a delay in vaccination; or who are legally entitled to an accommodation with regard to the COVID-19 vaccination requirements based on an applicable Federal law must undergo weekly testing for COVID-19.

Documentation of health exams, COVID-19 vaccination information, screenings, and/or tests must be kept on file.

Performance Standard(s):

1302.93; 1302.94

	DHS Head Start Program Policy		
PDM 16			
SUBJECT	Staff Safety Training		
REFERENCE	Program Design and Management		
EFFECTIVE	6/27/2017		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/25/17	Governing Body Approval: 9/28/17	Governing Body Revision: 9/28/17
PAGE: 1 of 1			

Policy:



All Head Start Program staff must receive an initial safety orientation within 90 days of hire, on an annual basis, and/or as required by issuing entity. The Head Start Program, including the Head Start Grant Recipient, Education Service Providers, and contractors, will develop and implement procedures to ensure the following safety training requirements are met and documented.

At a minimum, safety training will include:

- A. The prevention and control of infectious diseases;
- B. Prevention of sudden infant death syndrome and use of safe sleeping practices;
- C. Administration of medication, consistent with standards for parental consent;
- D. Prevention and response to emergencies due to food and allergic reactions;
- E. Building and physical premises safety, including identification of and protection from hazards, bodies of water, and vehicular traffic;
- F. Prevention of shaken baby syndrome, abusive head trauma, and child maltreatment;
- G. Emergency preparedness and response planning for emergencies;
- H. Handling and storage of hazardous materials and the appropriate disposal of bio-contaminants;
- I. Appropriate precautions in transporting children, if applicable;
- J. First aid and cardiopulmonary resuscitation; and,
- K. Recognition and reporting of child abuse and neglect.

Performance Standards:

1302.47(4); 1302.47(5)(i)

	DHS Head Start Program Policy		
PDM 17			
SUBJECT	Emergency Preparedness and Response Plan		
REFERENCE	Program Design and Management		
EFFECTIVE	6/27/2017		
Policy Council Approval: 7/25/17	Policy Council Revision: 7/28/20	Governing Body Approval: 9/28/17	Governing Body Revision: 8/13/20
PAGE: 1 of 1			



Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will develop and implement an emergency management/disaster preparedness and response plan including natural and man-made disasters and emergencies, and violence in or near the program that includes, at a minimum:

- Emergency Administrative Communication Protocols
- Critical Phone Numbers to Public Emergency Services
- Emergency Management/Disaster Preparedness Team
- Parent/Guardian Contact Protocol

Performance Standard:

1302.47(b)(8)

	DHS Head Start Program Policy		 HEAD START City of San Antonio Department of Human Services
PDM 18			
SUBJECT	Program Data - Access and Security		
REFERENCE	Program Design and Management		
EFFECTIVE	April 23, 2018		
Policy Council Approval: 1/22/19	Policy Council Revision: 5/24/22	Governing Body Approval: 2/28/19	Governing Body Revision: 8/4/22
PAGE: 1 of 3			

Policy:

The Head Start Grant Recipient and Education Service Providers must establish an internal procedure for proper access and security of program data for the City of San Antonio Department of Human Services Head Start and Early Head Program (DHS Head Start).

Procedure:

DHS Head Start utilizes ChildPlus as the secure database system for storing and tracking client information.

All user account holders are required to complete ChildPlus Access Request and ChildPlus User Security and Confidentiality Agreement forms. Upon completion, the forms are scanned and attached by the ChildPlus Administrator in ChildPlus under each respective user profile.

By accessing the database, staff understand and agree to abide by all terms of the ChildPlus User Security and Confidentiality Agreement and any applicable state and federal laws regarding Personally Identifiable Information (PII) and Protected Health Information (PHI).

- Education Service Providers are required to designate a staff member to complete the Personnel Profile for all staff members funded by the Head Start or EHS grant or anyone who works with children or families enrolled in the Head Start or EHS programs under the Management Module in ChildPlus. Designated staff is defined as preauthorized users in the Management/Personnel Module.
- Upon completion of the Personnel Profile, the designee will notify the ChildPlus Administrator if the user requires access to PII. Not all personnel require a ChildPlus user account.
- The ChildPlus Administrator will confirm with the designee the role of personnel and the types of access required.

- The ChildPlus Administrator will complete a User Security profile in ChildPlus, assign a login username and temporary password, restrict access by location, and designate User Security group(s).
- The ChildPlus Administrator will email the new account holder the login username and temporary password.
- The new account holder will log into ChildPlus and change the temporary password to a permanent password.

Authorized ChildPlus users are granted access under one of the following groupings:

- Staff: A ChildPlus personnel account will be created for all staff. ChildPlus user accounts and access is granted upon the approval of the ChildPlus Access Request Form and the completion of the ChildPlus User Security and Confidentiality Agreement Form.
- Education Service Providers: An assigned ChildPlus Super User for each Service Provider formally requests accounts via email for Service Provider Head Start Staff. Service providers are subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA).
- Contracted Providers: A Special Projects Manager or designee will request user accounts for contractual providers via email or meeting with the ChildPlus Administrator. To meet the requirements of HIPAA, DHS Head Start requires any contract that include access to client information include an enforceable Business Associate Agreement (BAA). BAAs are documented in the professional services contract with the DHS Head Start.

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard HIPAA, FERPA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) Part B and C data from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA Part B and C electronically must follow encryption guidelines and ensure the receiving entity is an authorized recipient of the specific data being delivered

Only computers configured by ITSD for use on the CoSA network are authorized for accessing ChildPlus.

Staff may utilize a program issued computer or device to access ChildPlus.

Staff ensures the environment in which they are working is secure and only authorized

persons are within viewing distance of the authorized user's screen and/or confidential documents. Staff should use a privacy screen for all monitors and laptop screens as appropriate.

All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).

Disclosure of ChildPlus information to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.

All DHS Head Start staff must successfully complete the following trainings:



- COSA Security Awareness Training
- COSA HIPAA Training
- Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff must acknowledge the of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and ensure all staff receive training on safeguarding FERPA, HIPAA, PHI, PII and (IDEA) Part B and C data.

Performance Standard:

1302.101(b)(4)

	DHS Head Start Program Policy		
PDM 19			
SUBJECT	Management of Program Data		
REFERENCE	Program Design and Management		
EFFECTIVE	April 23, 2018		
Policy Council Approval: 1/22/19	Policy Council Revision: 5/24/22	Governing Body Approval: 2/28/19	Governing Body Revision: 8/4/22
PAGE: 1 of 2			

Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, must establish an internal procedure for proper management of program data for the City of San Antonio Department of Human Services Head Start and Early Head Start Program (DHS Head Start).

Procedure:

Implementation of technical policies and procedures for electronic information systems that maintain electronic PII, PHI, and IDEA Part B and C to allow access only to those persons or software programs that have been granted access rights.

All DHS Head Start staff, regardless of position, share the responsibility to safeguard FERPA, HIPAA, PHI, PII, and the Individuals with Disabilities Education Act (IDEA) Part B and C data from unauthorized access, acquisition, or disclosure. Staff that share PHI, PII and IDEA Part B and C electronically must ensure the receiving entity is an authorized recipient of the specific data being delivered.

- Only computers configured by ITSD for use on the CoSA network are authorized for the storage or transport of PHI, PII and/or IDEA Part B and C data.
- Staff may utilize a program issued device to access systems to view and maintain PHI, PII, and IDEA Part B and C files.
- Staff ensures the environment in which they are working is secure and only authorized persons are within viewing distance of the authorized user’s screen. Staff should use a privacy screen for all monitors and laptop screens as appropriate.
- Disclosure of PII and/or PHI, and/or IDEA Part B and C to a contractor is authorized but ONLY when an enforceable Business Associate Agreement (BAA) is in place.
- Personal devices shall not be used to store or transmit unencrypted protected data.

- Any removable media or storage devices used to transfer PHI, PII, and/or IDEA Part B and C data must be encrypted.
- All devices (e.g., laptops and phones) must have auto-lock enabled with a maximum timeout of 15 minutes. Staff are encouraged to lock their workstations manually when leaving their desk (Windows key + L or CTRL+ALT+DEL).
- If any PHI, PII, and/or IDEA Part B and C data is transmitted via email, the email must be encrypted, and the attachment must be protected by a password. The password to access the attachment must be sent to the recipient in a separate email.
- Hard copies (i.e., paper) of any PHI, PII, and/or IDEA Part B and C data must be kept secured in a lockable file cabinet or other secured storage.
- In the event that PHI, PII, and/or IDEA Part B and C data, either hard copy or electronic, are transported between locations, staff must take all precautions to ensure the materials remain secure and must remain in the presence of staff at all times.

Facsimiles

- Any documents received via facsimile, either telefax or online, that contain PHI, PII and/or IDEA Part B and C data shall be uploaded or scanned into appropriate software (i.e., ChildPlus) as soon as possible. Any electronic copies of the facsimile should be saved to the user's desktop; once the upload is completed the file should be deleted and the deletion confirmed. Any hardcopies of the facsimile must be stored in a secure location or destroyed.
- Any hardcopies of the documents sent via facsimile, either telefax or online, that contain PHI, PII and/or IDEA Part B and C data shall be either stored in a secure location or destroyed.

All DHS Head Start staff must successfully complete the following trainings annually:

- COSA Security Awareness Training
- COSA HIPAA Training
- CoSA Employee Security Awareness Day in the Life online training module



Completion of these trainings are documented and maintained by the City of San Antonio Human Resources Department.

All DHS Head Start staff review and acknowledge review and acceptance of CoSA Administrative Directives that include Data Security and Use of Technology.

Education Service Providers and contractors must develop and implement procedures to ensure all staff comply with this procedure and receive training on safeguarding FERPA, HIPAA, PHI, PII and IDEA Part B and C data.

Performance Standard:

1302.101(b)(4)

	DHS Head Start Program Policy		
PDM 20			
SUBJECT	Program Information Report Data Entry and Completion		
REFERENCE	Program Design and Management		
EFFECTIVE	8/2019		
Policy Council Approval: 4/23/19	Policy Council Revision: 4/23/19	Governing Body Approval: 5/23/19	Governing Body Revision: 5/23/19
PAGE: 1 of 1			

Policy:

The Head Start Program, including the Head Start Grant Recipient and Education Service Providers, will develop and implement a process of ongoing record keeping and reporting through the utilization of ChildPlus to collect and record information about children and families for data analysis, evaluation, program improvement, and reporting required by the Head Start Act. This process will ensure timely and accurate submission of the Program Information Report (PIR) to the Office of Head Start.

The Head Start Grant Recipient and Education Service Providers will develop and implement procedures to ensure information required for the Program Information Report is entered, reviewed, and updated according to the *City of the San Antonio Benchmark Due Date Guide* and applicable *ChildPlus Data Entry Guides*.

Performance Standard:

1302.101(b)(4)

Head Start Act:

642(d)(2)