



Administration for Children and Families
U.S. Department of Health and Human Services



FY 2016 Office of Head Start HSKI-C Monitoring Protocol



FY2016 HS Key Indicator-Compliance (HSKI-C) Protocol: Overview

Overview

The Office of Head Start (the OHS) presents the **FY 2016 Head Start Key Indicator-Compliance (HSKI-C)**. The HSKI-C is an evidence-based tool that identifies whether grantees qualify for differential monitoring. Grantees that qualify for and pass the HSKI-C will receive an Environmental Health & Safety (EnvHS) Review and a CLASS[®] Review over their 5-year grant period. Grantees that do not qualify for the HSKI-C or are not successful with the HSKI-C Review will receive comprehensive monitoring, which includes a Fiscal Integrity and ERSEA Review, Comprehensive Services and School Readiness Review, and Leadership, Governance, Management Systems Review.

The OHS will look at the following criteria to identify grantees that are eligible for the HSKI-C review: a compliant review with no additional findings since the last monitoring cycle; no fiscal findings in the last two monitoring cycles; not meeting any DRS criteria, including CLASS; and a history of clean annual audits. In addition, the Regional Office will provide input to determine the grantee's eligibility for differential monitoring. The HSKI-C Protocol is an indicator tool designed only to determine whether a grantee needs to undergo the Comprehensive Monitoring process. As a result, the HSKI-C Protocol will not be used to identify findings. Findings would be identified through the Comprehensive Monitoring Process.

Following the HSKI-C Review event, the OHS will send a letter to the grantee indicating whether the HSKI-C Review was successful. In order to be considered successful, the grantee must be successful for all 27 Key Indicators in the HSKI-C Protocol. Grantees that are not successful in the HSKI-C Review event will move to the Comprehensive Monitoring process, while those that are successful will move to the Differential Monitoring process. Note that the HSKI-C letter will inform the grantee of the overall results of the HSKI-C review; however, it will not indicate the area or areas in which issues were identified. The HSKI-C tool is designed to identify the path for subsequent monitoring events for each grantee and is not intended to identify findings. Grantees can learn more about both the Comprehensive and Differential Monitoring processes by visiting the Aligned Monitoring System training modules and reviewing the materials posted in the Virtual Expo.

Organization of the Protocol

Content Areas

The HSKI-C Protocol is used to gather information to assess grantee performance across the following content areas:

- Fiscal Integrity
- Leadership and Governance
- Management Systems
- Comprehensive Services and School Readiness, which includes Child Health & Safety, Family & Community Engagement, and Child Development & Education

Fiscal Integrity. The Fiscal Integrity section of the HSKI-C Protocol focuses on assessing whether the program maintains effective financial management systems, timely and complete financial records, signed and approved time records, and necessary and reasonable non-Federal-share (NFS) contributions, as well as complete and accurate equipment records.

Leadership and Governance. For Leadership and Governance, the HSKI-C Protocol guides the Reviewer in assessing the composition of the Policy Council, training and technical assistance provided to the governing body and the Policy Council, the extent to which the governing body fulfills its responsibilities regarding program administration and operations, and the effectiveness of the program's reporting to the governing body and the Policy Council.

Management Systems. The HSKI-C Protocol's Management Systems section enables the OHS to assess the effectiveness of the program's annual Self-Assessment, its practices and system for ongoing monitoring of program services and operations, and the program's system for maintaining up-to-date and accurate records. The Management Systems section also guides the assessment of several aspects of the program's Human Resources function, including its establishment of standards of conduct and process for ensuring all staff abide by the standards and the program's completion of criminal record checks for its staff. A final focus of this section is on the publication and availability of the Annual Report to the Public.

Comprehensive Services & School Readiness. This section of the HSKI-C Protocol guides the review of the grantee's delivery of comprehensive, individualized services to children, pregnant women, and families. Comprehensive Services & School Readiness includes:

- **Child Health & Safety:** An assessment of whether and how the grantee establishes each child's health status and provides follow-up and referral as required.
- **Family & Community Engagement:** An assessment of how the grantee educates parents in order to promote positive parent-child relationships and makes Mental Health services available to support parents and staff. Also, this section assesses the grantee's partnerships with Local Education Agencies (LEAs) and other Part C agencies that support services to children and their families.
- **Child Development & Education:** An assessment of the grantee's system used to track and report on school readiness goals, the grantee's use of an evidence-based curriculum, and the individualization of services to meet children's specific needs.

Key Indicators

The HSKI-C Protocol is composed of a series of Key Indicators. (Key Indicators are the specific statements that ground the HSKI-C review.)

Targeted Questions

Targeted Questions (TQs) for each Key Indicator are designed to provide guidance to on-site Reviewers and ensure a standardize method for evidence collection. TQs indicate questions to ask within interviews, information to retrieve from documents, and observations to conduct. Reviewers are required to answer all TQs for each Key Indicator.

Guides

The HSKI-C Protocol contains organizing tools called Guides. In the OHS Monitoring System (OHSMS) software, the Guides align the TQs according to the method of collecting information while on site. The Guides pull together all the TQs related to a particular method and source of evidence collection (e.g., Policy Council Interview, Staff File Review). The responses to each TQ in a Guide are linked to the appropriate Key Indicator.

HSKI-C Reviewers use the following Guides:

- **Interviews**
- **Staff file review**
- **Document review**

In the OHSMS software, the Guides and HSKI-C Protocol are customized to reflect the type of program being reviewed (e.g., center-based, Family Child Care, home-based, and migrant) and the types of children or populations served by the program (e.g., infants and toddlers, preschool-age children, and pregnant women and new mothers).

Head Start Key Indicator-Compliant (HSKI-C) #1

Program Governance

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program has established a Policy Council elected by parents of currently enrolled children whose membership is composed of a majority of parents of children currently enrolled in the program as well as members of the community served by the Head Start agency. <i>Note: Applies to grantees only</i>	642(c)(2)(B)(i) 642(c)(2)(B)(ii)(I) 642(c)(2)(B)(ii)(II)

Targeted Questions

Policy Council—Interview

- ▶ Ask the Policy Council to describe the composition of its membership and share relevant documentation that confirms that the Policy Council has the appropriate composition, and members are elected.

Does the Policy Council membership meet the following requirements?

- At least 51 percent of the members are parents of children currently enrolled in the Head Start program (including delegate agencies).
- At least one member is from the at-large community served by the program or any delegate agency.
- Members are elected by parents of children currently enrolled in the program.

Ask the program to provide the documents needed and review them with you to confirm the Policy Council’s membership.

Head Start Key Indicator-Compliant (HSKI-C) #2

Program Governance

<i>Key Indicator</i>	<i>Federal Regulation</i>
Members of the governing body and the Policy Council receive appropriate training and technical assistance to ensure that they understand the information they receive and can provide effective oversight of, make appropriate decisions for, and participate in programs of the Head Start agency. <i>Note: Applies to grantees only</i>	642(d)(3)

Targeted Questions

Policy Council—Interview

- ▶ Ask the program to provide you with documentation of Policy Council training, (e.g., Policy Council meeting agendas and minutes), which you will review with staff while discussing this item.

Ask the Policy Council members to describe the training they received and provide examples of how the training has helped them make decisions about the Head Start program.

Governing Body—Interview

- ▶ Ask the program to provide you with documentation of governing body training, (e.g., governing body meeting agendas and minutes), which you will review with staff while discussing this item.

Ask the governing body members to describe the training received and provide examples of how the training has helped them make decisions about the Head Start program.

Head Start Key Indicator-Compliant (HSKI-C) #3

Program Governance

<i>Key Indicator</i>	<i>Federal Regulation</i>
The governing body is responsible for required activities and makes decisions pertaining to program administration and operations, including selecting delegates and service areas; establishing procedures and criteria for recruitment, selection, and enrollment; reviewing all applications for funding; and establishing procedures for selecting Policy Council members.	642(c)(1)(E)(iv)(I) 642(c)(1)(E)(iv)(II) 642(c)(1)(E)(iv)(III) 642(c)(1)(E)(iv)(VI)

Targeted Questions

Governing Body—Interview

- ▶ Ask the governing body members to explain their role in program planning and to provide specific examples. Did the governing body play a role in:
 - Establishing procedures and criteria for recruiting, selecting, and enrolling children?
 - Selecting delegate agencies, as appropriate?
 - Developing procedures for selecting Policy Council members?
 - Reviewing applications for funding and amendments to applications for funding?

Head Start Key Indicator-Compliant (HSKI-C) #4

Program Governance

Key Indicator	Federal Regulation
The Policy Council approves and submits decisions about identified program activities to the governing body. <i>Note: Applies to grantees only</i>	642(c)(2)(A) 642(c)(2)(D)(i) 642(c)(2)(D)(ii) 642(c)(2)(D)(iii) 642(c)(2)(D)(iv) 642(c)(2)(D)(v) 642(c)(2)(D)(vi) 642(c)(2)(D)(vii) 642(c)(2)(D)(viii)

Targeted Questions

Policy Council—Interview

- ▶ Ask the Policy Council members to describe their involvement in and provide examples of decisions made in the areas listed below.

Is the Policy Council actively involved in the following?

- Activities to support the active involvement of parents in supporting program operations, including policies to ensure that the Head Start program is responsive to community and parent needs
- Program recruitment, selection, and enrollment priorities
- Applications for funding and amendments to applications for funding
- Budget planning for program expenditures, including policies for reimbursement related to and participation in Policy Council activities
- Developing by-laws for the operation of the Policy Council
- Program personnel policies and decisions regarding the employment of program staff consistent with 642(c)(1)(E)(iv)(IX) and including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff
- Developing procedures for how members of the Policy Council of the Head Start program are elected
- Providing recommendations on the selection of delegate agencies and the service areas for such agencies
- Program design and operations
- Planning goals and objectives

Head Start Key Indicator-Compliant (HSKI-C) #5

Program Governance

<i>Key Indicator</i>	<i>Federal Regulation</i>
<p>Governing body and Policy Council members regularly receive and use information or reports about program planning, policies, and operations, including:</p> <ul style="list-style-type: none"> • Monthly financial statements (including credit card expenditures), program information summaries, program enrollment reports (including attendance reports for children whose care is partially subsidized by another public agency), and reports of meals and snacks provided through U.S. Department of Agriculture (USDA) programs • The annual financial audit, Self-Assessment (including findings related to such assessment), and Program Information Report (PIR) • The community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency, including applicable updates • Communication and guidance from the Secretary <p><i>Note: Applies to grantees only. Single or multiple reports may be used to capture the information listed above.</i></p>	<p>642(d)(2)(A) 642(d)(2)(B) 642(d)(2)(C) 642(d)(2)(D) 642(d)(2)(E) 642(d)(2)(F) 642(d)(2)(G) 642(d)(2)(H) 642(d)(2)(I)</p>

Targeted Questions

Policy Council—Interview

- ▶ Ask the Policy Council members how often they receive the reports listed below. Discuss whether the reports provided to the Policy Council contain the information needed to provide effective oversight.

Document whether the Policy Council receives the following reports as often as required:

Annual reports

- The financial audit
- The Self-Assessment, including any related findings
- The Program Information Report (PIR)

Monthly Reports

- Financial statements, including credit card expenditures (if the program uses credit cards)
- Program information summaries

Policy Council—Interview (continued)

Monthly Reports (continued)

- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Reports of meals and snacks provided through programs of the U.S. Department of Agriculture (USDA)

Additional reports

- Every 3 years, the community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency
- Applicable current updates from the Secretary (i.e., Program Instructions, Information Memoranda, etc.)

Ask the members whether the reports they received contributed useful and timely information to support the Policy Council's decision-making. If the reports are of poor quality and cannot be used by the Policy Council, capture that in your notes.

Governing Body—Interview

- ▶ Ask the governing body members how often they receive the reports listed below. Document whether the governing body receives the following reports as often as required.

Annual reports

- The financial audit
- The Self-Assessment, including any related findings
- The Program Information Report (PIR)

Monthly Reports

- Financial statements, including credit card expenditures (if the program uses credit cards)
- Program information summaries
- Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency
- Reports of meals and snacks provided through programs of the USDA

Additional reports

- Every 3 years, the community-wide strategic planning and needs assessment (Community Assessment) of the Head Start agency
- Applicable and current updates from the Secretary (i.e., Program Instructions, Information Memoranda, etc.)

Head Start Key Indicator-Compliant (HSKI-C) #6

Management Systems

<i>Key Indicator</i>	<i>Federal Regulation</i>
At least annually, the program conducts a Self-Assessment of program effectiveness that: <ul style="list-style-type: none">• Assesses progress in meeting local program goals and objectives• Evaluates program compliance with Federal requirements• Results in improvement plans	641A(g)(1) 641A(g)(2)(B)

Targeted Questions

Head Start/Early Head Start Director—Interview/Debrief

- ▶ With the Director, review the program’s Self-Assessment. Discuss the process the program uses to conduct the Self-Assessment, including:
 - How frequently it is conducted
 - How the program evaluates progress toward program goals
 - How improvement plans are developed

Head Start Key Indicator-Compliant (HSKI-C) #7

Management Systems

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program established and implements procedures for the ongoing monitoring of its operations and services to ensure compliance. The program's ongoing monitoring: <ul style="list-style-type: none">• Uses effective tools and procedures to ensure the program is in compliance and meets its goals and objectives• Clearly defines staff roles and responsibilities in program oversight• Conducts frequent, ongoing monitoring activities• Collects and uses data for planning activities and to ensure compliance• Ensures ongoing monitoring in delegate agencies takes place	641A(g)(3)

Targeted Questions

Head Start/Early Head Start Director—Interview/Debrief

- ▶ How does the program:
 - Use effective tools and procedures to ensure it is in compliance and meets its goals and objectives?
 - Clearly define staff roles and responsibilities in program oversight?
 - Conduct frequent ongoing monitoring activities?
 - Collect and use data for planning activities and to ensure compliance?
 - Ensure ongoing monitoring of delegate agencies takes place?

Health Services Coordinator—Interview

- ▶ How do you:
 - Monitor your program area to ensure high-quality services are being delivered to all children and families?
 - Define staff roles and responsibilities in monitoring your program area?
 - Collect and use data for planning activities and to change practices as needed?

Head Start Key Indicator-Compliant (HSKI-C) #8

Management Systems

Key Indicator	Federal Regulation
The program develops and implements written standards of conduct that are available to all staff and contain provisions for appropriate penalties when violations occur. <i>Note: 1304.52(i)(1)(iii) was removed from this section and is now located in CHS 5.5.</i>	1304.52(i)(1) 1304.52(i)(1)(i) 1304.52(i)(1)(ii) 1304.52(i)(1)(iv) 1304.52(i)(3)

Targeted Questions

Head Start/Early Head Start Director—Interview/Debrief

- ▶ Ask the Director to describe how the program informs staff about the standards of conduct. What policies and procedures does the program have in place to ensure that the standards are followed?

If there were any violations of the program’s standards of conduct, talk to the Director about such violations and determine what penalties were applied.

Head Start Key Indicator-Compliant (HSKI-C) #9

Management Systems

<i>Key Indicator</i>	<i>Federal Regulation</i>
Prior to employing an individual, the program obtains a: <ul style="list-style-type: none">• Federal, State, or Tribal criminal record check (CRC) covering all jurisdictions in which it provides Head Start services to children• Federal, State, or Tribal CRC as required by the law of the jurisdiction in which the program provides Head Start services• CRC as otherwise required by Federal law	648A(g)(3)(A) 648A(g)(3)(B) 648A(g)(3)(C)

Targeted Questions

Staff File Review

- ▶ Did the program obtain one of the following for the employee?
 - A State, Tribal, or Federal criminal record check (CRC) covering all jurisdictions in which the grantee provides Head Start services to children
 - A State, Tribal, or Federal CRC as required by the law of the jurisdiction in which the grantee provides Head Start services
 - A CRC as otherwise required by Federal law
- ▶ Was the employee hired within the last 12 months?
- ▶ Was the CRC conducted prior to employment?

Head Start/Early Head Start Director—Interview/Debrief

- ▶ If any staff members did not have a CRCs or were hired within the last 12 months and did not complete CRCs prior to hire, talk to the Head Start Director regarding the policies in place and determine why checks were not completed and what, if any, steps will be taken to correct the issue.

Head Start Key Indicator-Compliant (HSKI-C) #10

Management Systems

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program establishes and maintains a record-keeping system that supports the delivery of services to children and families. The program: <ul style="list-style-type: none">• Consistently collects and records data in an accurate and timely manner for children, families, and staff• Generates reports to inform planning, communication, and ongoing monitoring• Makes information accessible to appropriate parties• Maintains confidentiality	1304.51(g)

Targeted Questions

Child File Review

Head Start/Early Head Start Director—Interview/Debrief

- ▶ With the Head Start Director, discuss the program’s record-keeping system.
 - What data system does the program use?
 - How does the program ensure that the data are accurate and up to date? (e.g., ERSEA data, children kept up to date)
 - In what ways does the program use its data?
 - How does the program ensure data are kept confidential?

Head Start Key Indicator-Compliant (HSKI-C) #11

Management Systems

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program publishes and makes available to the public an Annual Report that contains: <ul style="list-style-type: none">• An explanation of the budgetary expenditures and proposed budget for the fiscal year• An explanation of the agency's efforts to prepare children for kindergarten	644(a)(2) 644(a)(2)(B) 644(a)(2)(G)

Targeted Questions

Head Start/Early Head Start Director—Interview/Debrief

- ▶ With the Director, review the program’s Annual Report. Discuss how the Annual Report is made public. Describe the information included in the report, including:
 - An explanation of budgetary expenditures and proposed budget for the fiscal year
 - Information on school readiness and how the grantee works to prepare children for kindergarten

Head Start Key Indicator-Compliant (HSKI-C) #12

Fiscal Integrity

<i>Key Indicator</i>	<i>Federal Regulation</i>
The grantee's financial management systems provide for effective control over and accountability for grant and sub-grant funds, property, and other assets and ensure they are used solely for authorized purposes.	75.302(b)(4-5) 75.501(b) 75.352(d)(1-3) 75.352(f) 75.352(g)

Targeted Questions

Delegate Agency—Document Review

- ▶ Does the grantee have one or more delegate agencies?
- ▶ How does the grantee use information in the audits and other information from delegate agencies—such as claims for reimbursement, support documentation, bank statements, and advance payment requests—for monitoring?
- ▶ Are recommendations discussed with the delegate agencies and corrective actions developed?
- ▶ How does the grantee ensure corrective actions occurred?
- ▶ If delegate agencies receive advance payments, how is the amount determined, and does the grantee recover the advanced amounts by the end of the grant year?
- ▶ What documentation is included with the requests for payment, and how are the requests processed?

Financial Reports/Accounting Records—Document Review

- ▶ Review grantee correspondence and notices from the Internal Revenue Service, State Income Tax, State Tax Withholding, Workers' Compensation, and Unemployment Compensation documents. Does any correspondence indicate unresolved compliance issues, such as unpaid amounts that were past due; material significant penalties for late, missing, or incomplete returns; or reports? If yes, describe all unresolved issues in detail and indicate the amount of any levies, taxes, payments, penalties, and interest claimed by the authority.

Financial Reports/Accounting Records—Document Review (continued)

- ▶ If a review of grantee correspondence and notices from the Internal Revenue Service, State Income Tax, State Tax Withholding, Workers' Compensation, and Unemployment Compensation documents revealed there were unresolved issues with late payroll taxes or late insurance premiums, can the agency document that no portion of the taxes or insurance premiums was related to the Head Start program?
- ▶ Are there amounts due but not remitted (e.g., unpaid taxes or insurance premiums)? If yes, did the grantee draw down funds from the payment management system (PMS) for the unremitted taxes or premiums?

Fiscal Officer—Interview

- ▶ What method does the program use to ensure that funds are available for payment of any vested accrued leave owed to employees of the grantee?
- ▶ What is the program's procedure for reviewing credit card charges/retail-store credit charges to ensure that only authorized signatories use agency credit cards and that charges are reasonable and necessary for program operations?
- ▶ Since the completion of the most recent audit, have there been significant changes in Fiscal staffing or the financial systems? If so, how has any potential negative impact associated with these changes been mitigated?
- ▶ Is the grantee current with processing transactions, payments to vendors, and production of financial reports for staff, the Board, and the Policy Council? Please describe the evidence you observed in arriving at your conclusion.
- ▶ What are your and your staff's experience and educational levels?
- ▶ Is the staffing level adequate to provide for appropriate segregation of duties? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is the agency current in its payments to the Internal Revenue Service and State tax authorities (significant amounts not remitted when due and/or significant penalties, interest, or levies related to late filings or late remittance)? Please describe the evidence you observed in arriving at your conclusion.

General Ledger—Document Review

- ▶ Review a report or listing of aged payables. Are bills and invoices paid on time (not more than 30 days past due unless disputed)?
- ▶ Review two consecutive bank statements. Are bank statements reconciled to the General Ledger? Are reconciling items (including outstanding checks) resolved within 30 days? Do checks clear the bank by the second statement after the issue date?
- ▶ If the reconciliations show any checks outstanding more than 60 days, can the grantee show that payments were disbursed (checks signed and issued to the payees) on or near the date on which the checks were written?
- ▶ Do the grantee's fiscal records differentiate development and administrative costs from program costs to ensure that development and administrative costs do not exceed 15 percent of the total grant (unless a waiver granting a higher percentage has been received)?

Non-Personnel Costs—Transaction Review

- ▶ How did the grantee ensure services were performed or goods received before the payment was processed? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Was the cost supported by a contract or an invoice, if appropriate? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Was the cost posted to the appropriate award period?
- ▶ Are approvals of the documents supporting this transaction consistent with the approval process described in the organization's Fiscal Policies and Procedures? Is the approver someone other than the person making the order? Was a purchase order completed (if required by the organization's policies and procedures)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ If payment was made by check, has the check cleared the bank? If not, does the grantee maintain documentation to demonstrate the payment was disbursed (check written, signed, and issued to the vendor)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is credit card use consistent with the organization's written policies? Please describe the evidence you observed in arriving at your conclusion.

FIFO & Audit—Document Review

- ▶ Are there unresolved audit findings that should be considered by the Reviewer?
- ▶ Does the most recent audit include audit findings either directly or indirectly related to the Head Start program?
- ▶ Do audit reports disclose any companies related to the grantee organization providing services and/or facilities to the Head Start program?
- ▶ Does the latest audit report describe potential impairment of financial health or significant issues outside of audit findings that should be considered by the Reviewer?
- ▶ Are there specific issues involving key personnel that should be considered by the Reviewer?
- ▶ Did the Regional Office list any other issues that should be considered by the Reviewer?

Procurement—Transaction Review

- ▶ Were the grantee's written procurement procedures followed (use of purchase orders, approvals, documentation of cost quotations, etc.)?
- ▶ How did the grantee ensure the services were performed of the goods received before the payment was processed?
- ▶ Are approvals of the documents supporting this transaction consistent with the approval process described in the organization's fiscal policies and procedures? Is the approver someone other than the person making the order? Was a purchase order completed (if required by the organization's policies and procedures)?
- ▶ If the payment was made by check, has the check cleared the bank? If not does the grantee maintain documentation to demonstrate the payment was disbursed (check written, signed and issued to the vendor)?
- ▶ Is credit card use consistent with the organization's written policy?

Head Start Key Indicator-Compliant (HSKI-C) #13

Fiscal Integrity

<i>Key Indicator</i>	<i>Federal Regulation</i>
Financial reports and accounting records are timely and complete and contain accurate information pertaining to grant or sub-grant awards, authorizations, obligations, unobligated balances, assets, liabilities, outlays (total expenditures), income, and interest. Reports include: <ul style="list-style-type: none">• SF-425 (paper-based Federal Financial Report filed with Regional Office);• SF-425 (web-based Federal Cash Transactions Report filed with Division of Payment Management); and• USDA/Child and Adult Care Food Program (CACFP) reports.	1304.23(b)(1)(i) 1304.51(h) 75.302(b)(2) 75.302(b)(3)

Targeted Questions

Financial Reports/Accounting Records—Document Review

- ▶ Using the most recent Final SF-425 and financial records, document the following and identify whether there is a difference among amounts recorded in the financial records, amounts reported on the audit, and amounts reported on the SF-425.
- ▶ Has the grantee reconciled any differences between the amounts recorded in the financial records and amounts reported on the SF-425?
- ▶ Describe any unreconciled differences and discuss with the Fiscal Officer.
- ▶ Did disbursements for the latest award reported on the most recent PMS report (the SF-425 submitted electronically each quarter) vary from the disbursements reflected in the grantee’s financial records? Describe any differences and discuss with the Fiscal Officer.
- ▶ Did the grantee’s accounting records separately identify the source and application for each Head Start award: Federal awards, authorizations, unobligated balances, assets, liabilities, outlays (total expenditures), income, and interest?
- ▶ Is the total recipient share (NFS) in the grantee’s financial records at least as much as the amount shown on the most recent Final SF-425? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Were any USDA/CACFP claims reduced or rejected due to late or inaccurate reporting or improper documentation of costs, resulting in a disallowance or reduced payment to the program?

- ▶ Compare the actual USDA revenue reported in the paper-based Final SF-425 filed with the budgeted amount of USDA revenue reflected on the Grant Application Budget Instrument (GABI) and ask the grantee to document the total food costs for the Head Start program and show the sources from which the food costs were paid. Based on your review of this documentation, was Head Start charged for food costs that should have been paid by the USDA?
- ▶ Does the grantee's most current USDA/CACFP compliance review identify any areas of noncompliance related to fiscal issues? If yes, did USDA/CACFP disallow any costs?
- ▶ Based on your review of the grantee's repayment of costs disallowed by the USDA, were Head Start funds used to pay the disallowance?
- ▶ Based on your review of the grantee's records, was it determined that the USDA removed the grantee from participation in the CACFP program?

Head Start Key Indicator-Compliant (HSKI-C) #14

Fiscal Integrity

<i>Key Indicator</i>	<i>Federal Regulation</i>
Original time records are prepared and properly signed by the individual employee and approved by a responsible supervisory official, and an appropriate methodology was used to allocate salaries among Head Start and other programs.	220, App A(C)(4)(a) 220, App A(J)(10)(a) 220, App A(J)(10)(b) 220, App A(J)(10)(d) 225, App A(C)(3)(a) 225, App B(8)(h)(1) 225, App B(8)(h)(3) 225, App B(8)(h)(4) 230, App A(A)(4)(a)(2) 230, App B(8)(m)(1) 230, App B(8)(m)(2)

Targeted Questions

Payroll—Transaction Review

- ▶ Is the transaction part of a payroll approved by a responsible official of the organization?
- ▶ Is the transaction supported by time and attendance records (e.g., timecards, timesheets, summary records, or other supporting documentation verifying attendance) and signed or electronically approved by the employee or a supervisor having first-hand knowledge of the actual work performed by the employee?
- ▶ Which of the following best describes the allocation of this position?
 - The position is allocated 100% to Head Start or 100% to Early Head Start (EHS).
 - The position is allocated only between Head Start and EHS.
 - The position is allocated between Head Start/EHS and a related program, such as Child Care or State Pre-K.
 - The allocation includes an unrelated program and/or Central Administration.
- ▶ Which of these best describes the allocation between Head Start/EHS and unrelated programs and/or Central Administration?
 - The allocation between Head Start/EHS and unrelated programs and/or Central Administration is based on actual activity.

- The allocation between Head Start/EHS and unrelated programs and/or Central Administration is based on budgeted dollars, ability to pay, or fixed percentages not supported by a rationale.
 - The allocation between Head Start/EHS and unrelated programs and/or Central Administration is supported by an activity base (e.g., number of transactions, number of supervised staff).
 - The grantee uses another allocation methodology not described above.
- ▶ Which of these best describes the allocation between Head Start/EHS and related program(s), such as State Pre-K or Child Care?
- The allocation is based on actual activity.
 - The allocation base (e.g., total salary dollars in each program, total expenses in each program) typically requires a Negotiated Indirect Cost Rate Agreement.
 - The allocation methodology uses one or more activity bases, such as the number of children served, hours of operation, or a time study or similar analysis based on direct hours of identifiable services provided.
- ▶ Which of these best describes the allocation between Head Start and EHS?
- The allocation between Head Start and EHS uses the same percentages as those used in the GABI accompanying the approved funding application.
 - The allocation is based on actual activity.
 - The allocation is based on budgeted dollars, ability to pay, historical time studies, or fixed percentages not supported by a rationale.
 - The allocation is supported by an activity base (e.g., hours of service, number of children, etc.).
 - The grantee uses another allocation methodology not described above.
- ▶ How has the grantee documented actual activity?
- The grantee is an educational institution and uses a method recognizing the principle of after-the-fact confirmation.
 - The grantee is a government entity and uses periodic certification demonstrating (at least semi-annually) that the employee worked solely under the Head Start/EHS award during the period covered by the certification.
 - The grantee is a non-profit or government entity and uses personnel activity reports (PARs).
- ▶ Were the PARs prepared at least monthly, and did they coincide with one or more pay periods?
- ▶ Did the PAR account for the total activity for which the employee was compensated?

- ▶ Was the PAR signed by the individual employee or, for non-profit agencies only, by a responsible supervisory official having first-hand knowledge of the activities performed by the employee?
- ▶ Is the allocation supported by current data?
- ▶ Based on a review of available information (e.g., job description, organization chart, classroom rosters, list of programs served by the agency), is the salary properly allocated? Please describe the evidence supporting your conclusion.
- ▶ Is the allocation base an appropriate measure of the benefit received by each program? Please describe the evidence you observed in arriving at your conclusion.
- ▶ If the grantee uses another allocation methodology, please describe the allocation methodology used. Does the methodology allocate costs in proportion to the benefits received by each program? Please describe the evidence observed in arriving at your conclusion.

Head Start Key Indicator-Compliant (HSKI-C) #15

Fiscal Integrity

<i>Key Indicator</i>	<i>Federal Regulation</i>
The grantee can demonstrate that all contributions of non-Federal share (NFS), including cash and third-party in-kind (such as donated services, goods or supplies), are necessary and reasonable for accomplishing program objectives, allowable under applicable cost principles, and allocable if also benefiting another award. Financial records are also sufficient and support the verification of adherence to applicable cost principles.	75.306(b)(1-5) 75.306(e) 75.306(g) 75.306(i)(1-3) 75.434(d)

Targeted Questions

FIFO & Audit—Document Review

- ▶ Any there any issues related to NFS that should be considered by the Reviewer?

Non-Federal Share—Transaction Review

- ▶ Was the cash expended for allowable costs necessary and reasonable for the operation of the Head Start program?
- ▶ This question applies only if cash match was from State or local government funds. Has the grantee established that the claimed match is not from funds paid by the Federal Government under another award, except where authorized by Federal statute, or the funds were not used to match other Federal funds? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does the grantee administer other programs that require a match?
- ▶ How did the grantee establish that the donation has not been counted toward a match for another program? Please describe the evidence you observed in arriving at your conclusion.
- ▶ For cash matches, was the cash counted as match when expended and not when received? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does the claimed NFS appear to be allowable and necessary for the operation of the Head Start program?
- ▶ Were donated items intended to be taken home for personal use by the child or parent (e.g., clothing, household items)? Please describe the evidence you observed in arriving at your conclusion.

Non-Federal Share—Transaction Review (continued)

- ▶ Was the claimed match from funds paid by the Federal Government under another award?
- ▶ Did authorizing legislation allow the funds to be used as a match? Please describe the evidence you observed in arriving at your conclusion.
- ▶ How was value established, and is it reasonable? Is the rate consistent with the rates paid for similar services in the recipient's organization (including fringe benefits) or the employee's regular rate of pay (for services provided by the employee of another organization) or, for services not found within the recipient's organization, consistent with the rates paid for similar services in the local labor market (including fringe benefits)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ For donated services, is the nature and duration of the activity, service date, location in which the service was performed, and volunteer signature included in the documentation? Please describe the evidence you observed in arriving at your conclusion.
- ▶ If applicable to the type of donated service, are claims supported by records identifying the number of children served and the services provided?
- ▶ Did the volunteer receive payment or a stipend from another Federal program, such as Foster Grandparents?
- ▶ Was the value reduced by the amount of the stipend? Please describe the evidence you observed in arriving at your conclusion.
- ▶ For donated space (other than space in family homes or occasional space rental), is the claimed value supported by a current appraisal performed by a licensed independent appraiser (e.g., certified real-property appraiser or General Services Administration representative) and certified by a responsible official of the recipient? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is the rate consistent with the rates paid for similar services in the recipient's organization (including fringe benefits), or, for services not found within the recipient's organization, consistent with the rates paid for similar services in the local labor market (including fringe benefits)? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Is the amount of time spent performing the activities reasonable? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does in-kind primarily benefit the parent or child (as outlined in OHS-PC-A-077) as opposed to benefiting the overall Head Start program?

Non-Federal Share—Transaction Review (continued)

- ▶ This question applies to at-home activities. Are parents' at-home activities related to doing things with the enrolled child that support the child's Head Start experience as articulated by the teacher (or home visitor) and support the curriculum used by the program? Please describe the evidence you observed in arriving at your conclusion.
- ▶ This question applies to claims for the use of parent in-home space. Did the grantee use an outside source (e.g., market survey) to support the claimed value? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Does this claim include parent transportation of children?

Head Start Key Indicator-Compliant (HSKI-C) #16

Fiscal Integrity

<i>Key Indicator</i>	<i>Federal Regulation</i>
The grantee has safeguarded equipment purchased using Head Start funds by maintaining complete and accurate equipment records, verifying the accuracy of records by conducting a physical inventory, and following disposition requirements. The grantee obtained advance Regional Office permission for any encumbrance of equipment acquired using Head Start funds.	75.320(d)(1-2) 75.320(a)(2) 75.320(e)

Targeted Questions

Equipment—Transaction Review

- ▶ Does the total cost of all equipment purchased with Head Start funds exceed \$50,000?
- ▶ Is the equipment supported by an entry in the grantee's equipment records, including all required information (description of the property; serial number or other identification number; source of the property; title holder; acquisition date; cost of the property; percentage of Federal participation in the cost of the property; location, use, and condition of the property; and ultimate disposition data, including date of disposal and sales price of the property)?
- ▶ Can the grantee document that the equipment was part of a physical inventory conducted at least once in the past 2 years?

Financial Reports/Accounting Records—Document Review

- ▶ Since the last review, has the grantee sold or disposed of any equipment with a fair-market value of \$5,000 or more?
- ▶ How did the grantee determine the fair-market value? Please describe the evidence you observed in arriving at your conclusion.
- ▶ Did the grantee request and follow disposition instructions from the Regional Office?

Loan Review—Transaction Review

- ▶ If the loan agreement did not exclude assets having a Federal interest from use as collateral, did the grantee receive written approval from the Grants Management Officer (or designee) to encumber the Federal interest in Head Start equipment?

Head Start Key Indicator-Compliant (HSKI-C) #17

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program has established procedures for tracking the provision of Health services.	1304.20(a)(1)(ii)(C)

Targeted Questions

Health Services Coordinator—Interview

- ▶ With the coordinator, review the program's health-tracking system. Ask how often the system is updated and which staff are responsible for keeping it up to date. Does the system include all necessary information, including information on:
 - Medical services?
 - Dental health services?
 - Mental Health services?
 - Nutrition services?For all of the above types of services, does the tracking system include:
 - Dates of services?
 - Types of screenings, assessments, and referrals?
 - Results and outcomes?
- ▶ When reviewing the tracking system, confirm that the information in the system aligns with the information documented in the child files. Look at a sample of information for 10 children to ensure the data align. Clearly document any discrepancies in the data observed and ask program staff to clarify why the data in the different sources may be different.

Head Start Key Indicator-Compliant (HSKI-C) #18

Comprehensive Services & School Readiness

Key Indicator	Federal Regulation
The program ensures that a Health staff member visits each newborn within 2 weeks after birth to ensure both the mother's and the child's well-being. <i>Note: Applies only to programs serving pregnant women and new mothers</i>	1304.40(i)(6)

Targeted Questions

Health Services Coordinator—Interview

- ▶ Ask the Health Services Coordinator how the program ensures that newborns and their mothers are visited by Health staff within 2 weeks after birth.
- ▶ With the Health Coordinator, review files of new mothers, and:
 - Look for documentation in the files indicating when visits occurred
 - If the visits occurred, determine whether a Health staff member made the visit to the newborn and mother
 - Document any visits that occurred more than 2 weeks after delivery or did not occur at all
 - If visits occurred later than 2 weeks after birth or did not occur at all, document the reason they were late or did not occur, including whether the mother refused or delayed the visit

Head Start Key Indicator-Compliant (HSKI-C) #19

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program provides educational opportunities for parents to enhance their parenting skills that include: <ul style="list-style-type: none">• Understanding the educational and developmental needs of their children• Sharing concerns and observations about their children with program staff	1304.40(e)(2) 1304.40(e)(3)

Targeted Questions

Parent—Interview

- ▶ Ask parents to discuss the following:
 - What types of information they have received about their children's developmental strengths or areas for growth
 - How they partner with staff in developing goals for their children
 - How the program shares information about their children's progress
 - Whether they were provided opportunities to share concerns about their children's development
 - Information the program shared about how they, as parents, could help promote their children's success as they get ready to enter school

Teacher, FCC Provider, Home Visitor—Interview

- ▶ Ask the staff to describe how the program provides opportunities for developing parenting skills and knowledge in the following areas:
 - Expectant parenting and pre-natal health (as applicable)
 - Strategies to support their children's development, including development of individual children's goals and strategies for preparing their children for school
 - Ensuring the health and safety of their children
 - Providing input and sharing concerns regarding their children

Head Start Key Indicator-Compliant (HSKI-C) #20

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
Program staff: <ul style="list-style-type: none">• Educate parents about how to strengthen and nurture supportive environments and relationships in the home and at the program• Identify appropriate responses to children’s behaviors• Encourage parents to share concerns and observations about their children’s mental health• Share observations with parents regarding their children’s behavior and development	1304.24(a)(1)(i) 1304.24(a)(1)(ii) 1304.24(a)(1)(iii) 1304.24(a)(1)(iv)

Targeted Questions

Early Child Development (ECD) Coordinator—Interview

- ▶ Ask the ECD Coordinator about the types of training and materials shared with parents. Collect information about how the mental health professional and/or staff:
 - Educate parents about how to strengthen and nurture supportive environments and relationships in the home and at the program
 - Identify appropriate responses to children’s behaviors
 - Encourage parents to share concerns and observations about their children’s mental health
 - Share observations with parents regarding their children’s behavior and development

Teacher, Family Child Care (FCC) Provider, Home Visitor—Interview

- ▶ Ask how ECD Staff:
 - Share information, observations, and concerns about children’s behavior and mental health with parents
 - Seek parents’ input to clarify their understanding
 - Provide parents with opportunities to share their own observations and concerns

Head Start Key Indicator-Compliant (HSKI-C) #21

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program makes provisions for Mental Health program services for parents and staff that include: <ul style="list-style-type: none">• Staff and parent education on mental health issues• On-site mental health consultation with mental health professionals• Activities promoting children's mental wellness	1304.24(a)(3)(ii)

Targeted Questions

Family and Community Engagement (FCE) Coordinator and FCE Staff—Interview

- ▶ Ask the FCE Coordinator and staff to describe how they share information and educational resources regarding children’s mental health and wellness and whether they have access to the Mental Health Consultant.

Educational resources on mental health and wellness should be provided to groups and individuals as needed. Focus on the type and quality of services and information provided to individual or groups of parents.

ECD Coordinator—Interview

- ▶ Ask what types of educational resources related to mental health issues are provided by the program to staff and parents. Ask how the mental health professional is involved and whether consultation is provided on site.

Head Start Key Indicator-Compliant (HSKI-C) #22

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program coordinates with and has current Interagency Agreements in place with Local Education Agencies (LEAs) and other agencies (Part C) within the service area.	1304.41(a)(4) 1308.4(l)(3) 1308.4(l)(4) 1308.4(l)(5) 1308.4(l)(7)

Targeted Questions

Disabilities Services Coordinator- Interview

- ▶ Review the program's Interagency Agreements with all the LEAs and other agencies (including Part C agencies for programs serving infants and toddlers) within the grantee's service areas and determine whether each of the following subjects is addressed:
 - Referrals for evaluations, Individualized Education Program/Individualized Family Service Plan meetings, and placement decisions
 - Transitions
 - File and resource sharing (school readiness goals and assessment information)
 - The current program year, with appropriate signatures and dates
- ▶ Ask the coordinator for the number of Interagency Agreements needed to ensure services are provided for all children with disabilities throughout the service area.
- ▶ When multiple districts exist, ask the coordinator to describe the process for ensuring effective Interagency Agreements are developed and maintained.
- ▶ If the program does not have formal agreements with some LEAs or Part C agencies, ask the coordinator the following:
 - Why agreements have not been made, with a description of efforts to date
 - Whether the Regional Office has been formally notified, and the recommended next steps

Head Start Key Indicator-Compliant (HSKI-C) #23

Comprehensive Services & School Readiness

Key Indicator	Federal Regulation
<p>The program has a system and processes in place to do the following in order to track, use, and report progress on school readiness goals:</p> <p>Aggregate and analyze the following:</p> <ul style="list-style-type: none"> • Individual, ongoing child-level assessment data for all children birth to age 5 • Child-level data at least three times a year using data from one or more valid and reliable assessment tools • For programs serving dual-language learners (DLLs): <ul style="list-style-type: none"> ◦ Status and progress in acquiring the knowledge and skills described in the Head Start Child Development and Early Learning Framework (demonstrated in any language, including the child’s home language) toward learning English <p>In order to use school readiness data:</p> <ul style="list-style-type: none"> • Combine input from parents and families with assessment data to determine each child’s status and progress in the five essential domains • Individualize experiences, instructional strategies, and services to best support each child • In combination with other program data, determine progress towards meeting program goals • Assess the fidelity of implementation of the curriculum • Direct continuous improvement related to the effectiveness of curriculum, instruction, professional development, and program design or other program decisions based on analysis of school readiness outcomes data <p>Report Results</p> <ul style="list-style-type: none"> • To inform parents and the community of the program’s progress in achieving school readiness goals <p><i>Note: Programs in operation fewer than 90 days are required to have a system to aggregate and analyze data at least twice during their program operation period.</i></p>	<p>1307.3(b)(2)(i) 1307.3(b)(2)(ii)</p>

Targeted Questions

School Readiness Assessment—Interview With ECD Coordinator and Head Start Director

- ▶ How does the program aggregate and analyze individual, ongoing child-level assessment data for children birth to age 5 in all program options (e.g., home-based, center-based, FCC, EHS, and Head Start)?
- ▶ Does the program have a plan to complete the required aggregate-data analysis?
- ▶ Ask the ECD Coordinator and Director to describe how the information gathered from the aggregated-data analysis helps the program assess progress toward achieving school readiness goals. (Ask them to provide specific examples, and document them in your notes.)
- ▶ Ask the ECD Coordinator and Director to describe how the program makes improvements in the following areas based on its analysis of school readiness outcomes. (Ask them to include examples, and document them in your notes.):
 - Curriculum and instruction
 - Professional development
 - Program design
 - Other program decisions
- ▶ Describe how the program supports DLLs in making progress toward school readiness goals and learning English.
- ▶ Describe how the program informs parents and the community of its progress in achieving school readiness goals.
- ▶ Ask the ECD Coordinator and Director to describe how the information gathered from the aggregated-data analysis helps the program assess progress toward achieving school readiness goals. (Ask them to provide specific examples, and document them in your notes.)

Teacher, Home Visitor, and FCC Provider-Interview

- ▶ Ask ECD staff to describe how they do the following. (Ask for specific examples, and document them in your notes.):
 - Use ongoing child-level assessment data to identify children’s levels of development
 - Provide experiences to support children’s development
 - Monitor children's progress throughout the program year

Head Start Key Indicator-Compliant (HSKI-C) #24

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program selects and implements a curriculum that is evidence based and is linked to ongoing assessment, with developmental and learning goals and measurable objectives.	642(f)(3)(C)

Targeted Questions

ECD Coordinator—Interview

- ▶ List the curricula the program uses for each program option and age group.
- ▶ Ask the ECD Coordinator to indicate whether each selected curriculum:
 - Supports the evidence base for its selection by considering the program option and ages of the children served, as well as by addressing staff development and training
 - Is linked to ongoing assessment
 - Includes developmental and learning goals appropriate for the ages of the children and program option
 - Includes measurable objectives
- ▶ Ask the ECD Coordinator to describe how he or she determines whether staff are implementing the curriculum as designed.

Head Start Key Indicator-Compliant (HSKI-C) #25

Comprehensive Services & School Readiness

Key Indicator	Federal Regulation
<p>The program uses information from ongoing observations and evaluations, as well as insight from parents, to determine how best to respond to each child’s individual characteristics, strengths, and needs.</p> <p><i>Note: Screenings results used for referring children for future evaluation is captured in Child Health and Safety and does not apply to individualizing in CDE.</i></p>	1304.20(f)(1)

Targeted Questions

Teacher, Home Visitor, FCC Provider—Interview

- ▶ Ask ECD staff to discuss how they use information to develop goals and plan experiences that respond to each child’s individual characteristics, strengths, and needs.

Ensure the following are included when individualizing for children:

- Ongoing observations
- Ongoing assessments of progress
- Insights from each child's family

Head Start Key Indicator-Compliant (HSKI-C) #26

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program has secured the services of a mental health professional, including on-site consultation for program staff and families that provides for timely identification and interventions to address children’s mental health concerns.	1304.24(a)(3)(i) 1304.24(a)(2)

Targeted Questions

Mental Health Services Coordinator—Interview

- ▶ Ask the Mental Health Coordinator to describe how the program uses the services of the mental health professional to identify and provide interventions to address mental health concerns and how frequently these consultations occur.
- ▶ Determine the role of the Mental Health Consultant and the type of services he or she provides to the program. Describe how the coordinator and consultant are involved in the design and implementation of program practices.
- ▶ If applicable, review the mental health professional’s Consulting Agreement with the Mental Health Coordinator to determine the types of services for which the professional is responsible and the frequency with which he or she visits the program. If there are discrepancies between the content of the Consulting Agreement and the results of the interview, describe the discrepancies and follow up as appropriate.

Head Start Key Indicator-Compliant (HSKI-C) #27

Comprehensive Services & School Readiness

<i>Key Indicator</i>	<i>Federal Regulation</i>
The program hires teachers with the required qualifications, training, and experience.	645A(h)(1) 645A(h)(2) 648A(a)(3)(B)(i) 648A(a)(3)(B)(ii) 648A(a)(3)(B)(iii)

Targeted Questions

Teacher–Preschool—Staff File Review

- ▶ Please enter the qualifications of the preschool teacher:
 - A baccalaureate or advanced degree in Early Childhood Education (ECE)
 - A baccalaureate or advanced degree and coursework equivalent to a major relating to ECE, with experience teaching preschool-age children
 - An associate’s degree in ECE
 - An associate’s degree in a related field and coursework equivalent to a major relating to ECE, with experience teaching preschool-age children
 - A baccalaureate degree and admission into the Teach For America program, passing a rigorous Early Childhood content examination such as Praxis II, teaching preschool children in a Teach For America summer training institute, and receiving ongoing professional development and support from Teach For America’s professional staff
 - Does not meet the qualifications
- ▶ Is the professional development plan designed to ensure attainment of qualifications, or is the staff person currently enrolled in a degree program?

Teacher–Infant/Toddler—Staff File Review

- ▶ Please enter the qualifications of the infant/toddler teacher:
 - A minimum of a current Child Development Associate (CDA) credential and training (or equivalent coursework) in ECD with a focus on infant and toddler development
 - Does not meet qualifications
- ▶ Is the professional development plan designed to ensure attainment of qualifications, or is the staff person currently enrolled in a degree program?