Head Start Key Indicator - Compliance Reviewer Handbook
Fiscal Year 2015
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1. Overview of the Head Start Key Indicator – Compliance (HSKI-C) Protocol

1.1 What is the HSKI-C Protocol?

The Head Start Key Indicators-Compliant (HSKI-C) Protocol is a research-based monitoring instrument that the Office of Head Start (OHS) is using to identify grantees that are eligible for differential monitoring. The HSKI-C protocol is an abbreviated version of the protocols used in the Comprehensive Monitoring System. It is comprised of 27 Compliance Measures that were selected based on how strongly they differentiated between high and low performing grantees. The HSKI-C covers the following review areas:

- Management Systems & Program Governance
- Comprehensive Services & School Readiness
- Fiscal Integrity

1.2 Overview of the HSKI-C Review Event Tasks

Typically two reviewers will be on-site to complete the HSKI-C Review Event. The HSKI-C Systems & Services Reviewer will collect evidence for the HSKI-C CMs covering Management Systems & Program Governance and Comprehensive Services & School Readiness. The HSKI-C Systems & Services Reviewer will interview various grantee staff, policy council members, governing body members, and parents and review staff files based on a pre-determined sample. The HSKI-C Systems & Services Reviewer will be on-site for three days to complete these tasks.

The HSKI-C Fiscal Reviewer will collect evidence for the HSKI-C CMs covering Fiscal Integrity. The HSKI-C Fiscal Reviewer will interview the Fiscal Officer and review transactions and other financial documents. The HSKI-C Fiscal Reviewer will be on-site for two days to complete these tasks.

1.3 How does the HSKI-C work in the aligned monitoring system?

The Office of Head Start (OHS) designed the aligned monitoring system to provide a different review process based on the grantee’s history. Grantees fall in one of two categories – those who meet the eligibility criteria will receive Differential Monitoring and all others will receive Comprehensive Monitoring (see Exhibit 1).

**Comprehensive Monitoring Process:** The Comprehensive Monitoring Process includes the following individual review events conducted over the first 3 years of a 5-year grant cycle: Environmental Health and Safety, Fiscal Integrity/ERSEA, CLASS™, Management Systems & Program Governance, and Comprehensive Services and School Readiness.

**Differential Monitoring Process:** In an effort to recognize grantees that have demonstrated strong performance through a history of compliance, OHS developed the Differential Monitoring Process. Grantees eligible for this process will receive a HSKI-C Review Event. Head Start grantees that are successful in the HSKI-C Review Event will receive the Environmental Health and Safety and CLASS™ Review Events. EHS grantees that are successful will receive Environmental Health and Safety and
Comprehensive Services and School Readiness since CLASS is not used in EHS programs. Grantees that are unsuccessful in the HSKI-C Review Event, meaning one or more indicators are triggered during their HSKI-C Review event, will go through the Comprehensive Monitoring Process.

Exhibit 1. Comparison of Monitoring Content Areas in Comprehensive Monitoring and Differential Monitoring Processes

<table>
<thead>
<tr>
<th>Content Area</th>
<th>Comprehensive Monitoring</th>
<th>Differential Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Health and Safety</td>
<td>√</td>
<td>√</td>
</tr>
<tr>
<td>CLASS™</td>
<td>√</td>
<td>√</td>
</tr>
<tr>
<td>Fiscal Integrity / ERSEA</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Comprehensive Services &amp; School Readiness</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Management Systems &amp; Program Governance</td>
<td>√</td>
<td></td>
</tr>
</tbody>
</table>

A grantee’s eligibility for the HSKI-C is determined by whether they demonstrate a history of compliance, which is defined as:
- A compliant review for the last monitoring cycle and any other reviews since then
- No Fiscal findings in the last two monitoring cycles
- A history of clean annual audits (including agency level audits that effect the Head Start program)
- No DRS criteria met, including CLASS (e.g., did not score in the bottom 10% on their last CLASS review)
- No significant changes in grantee structure or leadership (including the Fiscal Officer)
- No concerns identified through input from the Regional Office

Grantees that demonstrate a history of compliance are eligible to receive the HSKI-C. Grantees that do not demonstrate a history of compliance automatically go through the comprehensive review process. Grantee’s eligible for Differential Monitoring will receive a letter from OHS indicating their eligibility.

**Note that only grantees that demonstrate a history of compliance are eligible to receive the HSKI-C.**

In order to be successful in the HSKI-C, the grantee must pass all sections of the HSKI-C protocol (i.e., Management Systems & Program Governance, Comprehensive Services & School Readiness, and Fiscal Integrity). Grantees that pass the HSKI-C would continue through the differentiated monitoring process (see Exhibit 2).

If an issue is identified in any of the HSKI-C sections, this would be considered an “unsuccessful HSKI-C” and the grantee would go through the comprehensive monitoring process.
In terms of reporting, grantees will receive a letter indicating whether their HSKI-C Review Event was successful or unsuccessful, in addition to separate reports for the respective Environmental Health and Safety, CLASS or Comprehensive & Services and School Readiness Review Events depending on grantee type.
2. The HSKI-C Protocol

2.1 The HSKI-C Compliance Measures

The HSKI-C Tool was developed in consultation with Dr. Richard Fiene from The Pennsylvania State University. Dr. Fiene is a recognized expert in developing similar tools for state licensing of early childhood programs. Under Dr. Fiene’s guidance, The Lewin Group analyzed Monitoring data from FY 2012, FY 2013, and FY 2014 to identify CMs that were 1) best suited to differentiate between high-performing grantees (i.e., compliant grantees) and low-performing grantees (i.e., grantees with findings) and 2) tend to be cited in reviews that have the most findings. The Lewin Group, along with Danya International, further refined the HSKI-C protocol by examining the workload burden for HSKI-C Reviewers to ensure that the HSKI-C could be completed efficiently.

Exhibit 3 presents the 27 compliance measures in the HSKI-C. These tables can also be found in Appendix A for easy reference.

Exhibit 3. The HSKI-C Compliance Measures

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2 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.</td>
<td>642(c)(2)(B)(i)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(B)(ii)(I)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(B)(ii)(II)</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><em>Note: Applies to grantees only</em></td>
<td></td>
</tr>
<tr>
<td>2.1 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.</td>
<td>642(d)(3)</td>
</tr>
<tr>
<td><em>Note: Applies to grantees only</em></td>
<td></td>
</tr>
<tr>
<td>2.2 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.</td>
<td>642(c)(1)(E)(iv)(I)</td>
</tr>
<tr>
<td></td>
<td>642(c)(1)(E)(iv)(II)</td>
</tr>
<tr>
<td></td>
<td>642(c)(1)(E)(iv)(III)</td>
</tr>
<tr>
<td></td>
<td>642(c)(1)(E)(iv)(VI)</td>
</tr>
</tbody>
</table>
## Compliance Measures

| 2.4 | The Policy Council approves and submits decisions about identified program activities to the governing body.  
**Note:** Applies to grantees only | 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) |

| 3.1 | Governing body and Policy Council members regularly receive and use information or reports about program planning, policies, and operations, including:  
- 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 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 (the Community Assessment) of the Head Start agency, including applicable updates  
- Communication and guidance from the Secretary  
**Note:** Applies to grantees only. Single or multiple reports may be used to capture the information listed above. | 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) |

### Management Systems

| 1.2 | At least annually, the program conducts a Self-Assessment of program effectiveness that:  
- 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) |
### Compliance Measures

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 The program established and implements procedures for the ongoing monitoring of its operations and services to ensure compliance. The program’s ongoing monitoring:</td>
<td>641A(g)(3)</td>
</tr>
<tr>
<td>- Uses effective tools and procedures to ensure the program is in compliance and meets its goals and objectives</td>
<td></td>
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<td>- Clearly defines staff roles and responsibilities in program oversight</td>
<td></td>
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<tr>
<td>- Conducts frequent, ongoing monitoring activities</td>
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<tr>
<td>- Collects and uses data for planning activities and to ensure compliance</td>
<td></td>
</tr>
<tr>
<td>- Ensures ongoing monitoring in delegate agencies takes place</td>
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<tr>
<td>3.2 The program develops and implements written standards of conduct that are available to all staff and contain provisions for appropriate penalties when violations occur.</td>
<td>1304.52(i)(1)</td>
</tr>
<tr>
<td>Note: 1304.52(i)(1)(iii) was removed from this section and is now located in CHS 5.5.</td>
<td>1304.52(i)(1)(i)</td>
</tr>
<tr>
<td></td>
<td>1304.52(i)(1)(ii)</td>
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<tr>
<td></td>
<td>1304.52(i)(1)(iv)</td>
</tr>
<tr>
<td></td>
<td>1304.52(i)(3)</td>
</tr>
<tr>
<td>5.1 The program establishes and maintains a record-keeping system that supports the delivery of services to children and families. The program:</td>
<td>1304.51(g)</td>
</tr>
<tr>
<td>- Consistently collects and records data in an accurate and timely manner for children, families, and staff</td>
<td></td>
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<tr>
<td>- Generates reports to inform planning, communication, and ongoing monitoring</td>
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<tr>
<td>- Makes information accessible to appropriate parties</td>
<td></td>
</tr>
<tr>
<td>- Maintains confidentiality</td>
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<tr>
<td>5.2 The program publishes and makes available to the public an Annual Report that contains:</td>
<td>644(a)(2)</td>
</tr>
<tr>
<td>- An explanation of the budgetary expenditures and proposed budget for the Fiscal year</td>
<td>644(a)(2)(B)</td>
</tr>
<tr>
<td>- An explanation of the agency’s efforts to prepare children for kindergarten</td>
<td>644(a)(2)(G)</td>
</tr>
</tbody>
</table>

### Comprehensive Services and School Readiness

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5 The program has established procedures for tracking the provision of health services.</td>
<td>1304.20(a)(1)(ii)(C)</td>
</tr>
<tr>
<td>Compliance Measures</td>
<td>Federal Regulations</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------</td>
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</tbody>
</table>
| **1.7** The program ensures that a health staff member visits each newborn within two weeks after birth to ensure both the mother’s and the child’s well-being.  
*Note: Applies only to programs serving pregnant women and new mothers* | 1304.40(i)(6)       |
| **2.1** The program provides educational opportunities for parents to enhance their parenting skills that include:  
- 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) |
| **2.2** Program 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 | 1304.24(a)(1)(i)  
1304.24(a)(1)(ii)  
1304.24(a)(1)(iii)  
1304.24(a)(1)(iv) |
| **2.3** The program makes provisions for mental health program services for parents and staff that include:  
- 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) |
| **5.3** 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) |
| **1.2** 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:  
Aggregate and Analyze the following:  
- 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):  
  - 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) and toward learning English. | 1307.3(b)(2)(i)  
1307.3(b)(2)(ii) |
### Compliance Measures

In order to use school readiness data:

- 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 the analysis of school readiness outcomes data

#### Report Results

- To inform parents and the community of the program’s progress in achieving school readiness goals

**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.

<table>
<thead>
<tr>
<th>Compliance Measure</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2.1</strong> 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.</td>
<td>642(f)(3)(C)</td>
</tr>
<tr>
<td><strong>3.1</strong> 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. <strong>Note:</strong> Screenings results used for referring children for future evaluation is captured in Child Health and Safety and does not apply to individualizing in CDE.</td>
<td>1304.20(f)(1)</td>
</tr>
<tr>
<td><strong>3.4</strong> 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.</td>
<td>1304.24(a)(3)(i) 1304.24(a)(2)</td>
</tr>
</tbody>
</table>
# Fiscal Integrity

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 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.</td>
<td>74.21(b)(3)</td>
</tr>
<tr>
<td>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments. Note: This question relates to the &quot;control activities&quot; aspect of internal controls. Control activities are the policies, procedures, techniques, and mechanisms that enforce management directives, such as the process of adhering to requirements for budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, and reviewing, as well as accountability for stewardship of Government resources and achieving effective results.</td>
<td>74.21(b)(4)</td>
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<tr>
<td>92.20(b)(3)</td>
<td>92.20(b)(4)</td>
</tr>
<tr>
<td>92.26(a)</td>
<td>92.26(b)(1)</td>
</tr>
<tr>
<td>92.26(b)(2)</td>
<td>92.26(b)(3)</td>
</tr>
<tr>
<td>92.26(b)(4)</td>
<td>92.26(b)(5)</td>
</tr>
<tr>
<td>1301.32(a)(1)</td>
<td>A-133(400)(d)(3)</td>
</tr>
<tr>
<td>A-133(400)(d)(5)</td>
<td></td>
</tr>
<tr>
<td>2.1 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:</td>
<td>74.21(b)(1)</td>
</tr>
<tr>
<td>• SF-425 (paper-based Federal Financial Report filed to Regional Office);</td>
<td>74.21(b)(2)</td>
</tr>
<tr>
<td>• SF-425 (web-based Federal Cash Transactions Report filed with Division of Payment Management); and</td>
<td>92.20(b)(1)</td>
</tr>
<tr>
<td>• USDA/Child and Adult Care Food Program (CACFP) reports.</td>
<td>92.20(b)(2)</td>
</tr>
<tr>
<td>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.</td>
<td>1304.23(b)(1)(i)</td>
</tr>
<tr>
<td>220, App A(C)(4)(a)</td>
<td>1304.51(h)</td>
</tr>
<tr>
<td>220, App A(J)(10)(a)</td>
<td></td>
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<tr>
<td>220, App A(J)(10)(b)</td>
<td></td>
</tr>
<tr>
<td>220, App A(J)(10)(d)</td>
<td></td>
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<tr>
<td>225, App A(C)(3)(a)</td>
<td></td>
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<td>225, App B(8)(h)(1)</td>
<td></td>
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<td>225, App B(8)(h)(3)</td>
<td></td>
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<tr>
<td>225, App B(8)(h)(4)</td>
<td></td>
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<tr>
<td>230, App A(A)(2)</td>
<td></td>
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<tr>
<td>230, App B(8)(m)(1)</td>
<td></td>
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<tr>
<td>230, App B(8)(m)(2)</td>
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<tr>
<td>4.1 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.</td>
<td></td>
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</tbody>
</table>
### Compliance Measures

| 5.3 | 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.  

*45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, non-profit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments. Note: The use of cash and in-kind contributions must meet the same standards applicable to an expenditure of grant funds. They must support the accomplishment of program objectives and not benefit individual children or their families.* |
| 74.23(a)(1) | 74.23(a)(2) |
| 74.23(a)(3) | 74.23(a)(4) |
| 74.23(a)(5) | 74.23(d) |
| 74.23(f) | 74.23(h)(1) |
| 74.23(h)(2) | 74.23(h)(3) |
| 74.23(i)(1) | 74.23(i)(2) |
| 92.24(a)(1) | 92.24(b)(1) |
| 92.24(b)(3) | 92.24(b)(6) |
| 92.24(b)(7)(i) | 92.24(b)(7)(iv) |
| 92.24(c)(1) | 92.24(d) |
| 92.24(e)(2)(i) | 92.24(g) |

| 6.2 | 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 mortgage or loan agreements using real property or equipment acquired with Head Start funds. |
| 74.34(f)(1) | 74.34(f)(3) |
| 74.34(g) | 74.37 |
| 92.32(d)(1) | 92.32(d)(2) |
| 92.32(e) | |
3. HSKI-C Activities and Responsibilities

This section describes the various activities that need to be completed as part of the HSKI-C.

As mentioned above, there will typically be two reviewers conducting the HSKI-C Review event. One reviewer will collect evidence for the HSKI-C CMs covering Fiscal Integrity and one reviewer collecting evidence for the HSKI-C CMs covering Management Systems & Program Governance and Comprehensive Services & School Readiness.

The **HSKI-C Fiscal Reviewer** will be responsible for collecting information on Fiscal Integrity using the following guides:

<table>
<thead>
<tr>
<th>Interviews</th>
<th>Document Reviews</th>
<th>Transaction Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fiscal Officer interview</td>
<td>Financial Reports/Accounting Records</td>
<td>Payroll</td>
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<tr>
<td></td>
<td>FIFO &amp; Audit</td>
<td>Non-Federal Share</td>
</tr>
<tr>
<td></td>
<td>Delegate Agency</td>
<td>Equipment</td>
</tr>
<tr>
<td></td>
<td>General Ledger</td>
<td>Loan Review</td>
</tr>
</tbody>
</table>

The **HSKI-C Systems & Services Reviewer** will collect evidence for the HSKI-C CMs covering Management Systems & Program Governance and Comprehensive Services & School Readiness using the following guides:

<table>
<thead>
<tr>
<th>Interviews</th>
<th>Staff File Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governing body</td>
<td>Staff File (Criminal Record Checks)</td>
</tr>
<tr>
<td>Policy Council</td>
<td>Teacher (preschool &amp; infant/toddler)</td>
</tr>
<tr>
<td>Head Start/Early Head Start Director</td>
<td>Staff File</td>
</tr>
<tr>
<td>Health Coordinator</td>
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<tr>
<td>Fiscal Officer</td>
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<tr>
<td>Parent</td>
<td></td>
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<tr>
<td>Teacher, FCC Provider, Home Visitor</td>
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<tr>
<td>ECD Coordinator</td>
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<tr>
<td>Disabilities Coordinator</td>
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<tr>
<td>Mental Health Coordinator</td>
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</table>
Some things to note about the responsibilities of the HSKI-C Reviewers:

- An exit interview will **NOT** be conducted with the grantee at the end of the review. The results of the HSKI-C will be reported to the grantee by OHS.
- Should an immediate health and safety issue be observed during the HSKI-C Review Event, the HSKI-C Reviewer **MUST** report it to the Review Field Lead (RFL) as soon as possible.
- Remember that all activities and materials related to the HSKI-C are confidential. As with all review activities, details of the review or any issues **MUST NOT** be shared with the grantee.

3.1 Preparing for the HSKI-C Review Event

The Review Field Lead (RFL) will send the HSKI-C Reviewers an email that contains information on the HSKI-C Review Event. The information about the Grantee will include:

- The name and contact information of the Grantee escort, such as address and phone number
- The interview schedule
- Any notes that will be useful for the Review Event, including name and contact information for the other Reviewer assigned to the review

The HSKI-C Systems & Services Reviewer should also check the Evidence Binder in the OHSMS software for the staff file sample roster. Danya scheduling staff will develop the staff file roster and upload it into the Evidence Binder.

The HSKI-C Fiscal Reviewer should retrieve the Fiscal Information Form (FIFO) from the Head Start Enterprise System (HSES) and review the document. If the FIFO is not current or cannot be located on HSES, he/she should alert the RFL.

The week before the review event is scheduled to begin, the RFL will conduct a conference call with the two HSKI-C Reviewers to discuss any issues around the review and to coordinate the onsite activities. The reviewers should review the schedule for interviews and identify the points of contact at the grantee.

The HSKI-C Fiscal Reviewer should confirm that he/she has retrieved the FIFO from HSES and raise any questions or concerns about the FIFO. The HSKI-C Systems & Services Reviewer should confirm that he/she has received the staff file sample roster and raise any questions he/she might have about the roster.

3.2 Completing the HSKI-C Activities

The RFL will oversee the HSKI-C Review Event while the HSKI-C Reviewers are on-site. The RFL is the point of contact for any questions or concerns the HSKI-C Reviewers may have. The RFL also will be available to answer any questions or concerns the grantee may have while you are on-site.

During the review, the HSKI-C Reviewers will collect and document all required information by completing all applicable protocol guides, uploading evidence into the evidence binder, analyzing all
of the gathered information and then making the appropriate selections in the Evidence Assessment System (EAS).

While completing schedule of tasks with the grantee, it is important to remember that all HSKI-C tasks must be completed within the days allotted for the HSKI-C Review Event. The HSKI-C Systems & Services Reviewer will be on-site for three days while the HSKI-C Fiscal Reviewer will be on-site for two days. The grantee will provide staff support to assist the HSKI-C Reviewers in completing their tasks in a timely manner.

At the end of each day, the HSKI-C Reviewers will debrief their activities over a conference call and/or email with the RFL. The HSKI-C Reviewers should respond to any questions the RFL may have about the collected data. The RFL may have requests for follow-up data collection to help uncover any issues.

While on-site, many unforeseen issues may occur that prevent HSKI-C Reviewers from meeting their schedules. For example, the Head Start Director may have an unforeseen conflict with the prearranged interview time or the staff files may not have been prepared in advance for the Review Event. If the schedule cannot be met, then the HSKI-C Reviewer must adjust the schedule so that he/she is always working to complete the HSKI-C tasks. For example, if the Health Coordinator is not available for an interview until the morning of Day 2, then the HSKI-C Systems & Services Reviewer could start the staff file reviews and complete the interview when the Health Coordinator is available.

Efficiency is critical. Be as efficient as possible so that all of the tasks can be completed on time. To complete the HSKI-C activities as efficiently as possible, you should have a strong understanding of the HSKI-C protocol. Please refer to HSKI-C Tool Guidance for Compliance Measures FY 2015 document posted in the eLearning Center for guidance for each HSKI-C Systems and Services CM. Guidance for each HSKI-C Fiscal is provided in the training modules that will be posted on the eLearning Center.

Review the information in the document and in the eLearning Center and practice using the HSKI-C protocol several times before going out on each HSKI-C Review Event. Contact the HSKI-C RFL with any questions.

3.2.1 Interviews (HSKI-C Systems & Services Reviewer)

Interviews are a major source of monitoring information for the HSKI-C protocol. When conducting interviews, be sure to follow the instructions in the protocol. At the arranged time, meet with the interviewee to complete the interview. Answer any questions he/she may have about the HSKI-C. When you are finished with the interview, thank the interviewee for his or her time and answer any remaining questions he or she may have.

When conducting the interview, it is critical that you understand the purpose of the interview so that you can appropriately probe for additional information as needed. Remember that you should probe until you feel confident that you have a comprehensive understanding of the grantee’s policies and/or procedures to answer each targeted question in the guide. Some points to keep in mind when conducting the interviews:
Review the interview guide so that you can have a smooth interview
- Fully answer each targeted question
- Prompt to address each bullet in the interview guide
- Ask follow-up questions as necessary
- Ask for specific examples if the response is unclear
- Make certain that the interviewee understands the question you are asking; if it seems like he/she does not understand, rephrase the question
- Remember that the interviewee may be nervous; be patient and take your time with the interview

3.2.1.1  Head Start / Early Head Start Director Interview
The Director interview is designed to inform you of the program’s management systems as they apply to the CMs in the HSKI-C. The Director Interview questions allow you to develop an understanding of how the grantee is organized. Your questions will reveal how the program monitors operations and services, publishes its annual report, ensures that staff follow the standards of conduct, and ensures program records are consistently kept current and complete.

3.2.1.2  Health Coordinator Interview
The purpose of the Health Coordinator Interview is to take a closer look at the program’s systems for understanding where children are in their development. The Health Coordinator’s interview should provide you with details of how the program keeps track of screening and other health services information and uses it to ensure effective program services. If the grantee serves pregnant women and infants, this interview will also be used to ensure systems are in place to provide the support families with new babies need.

3.2.1.3  Governing Body Interview
The purpose of the Governing Body Interview is to gather information on how the Governing Body supports the work of the Head Start grantee. Your interview should provide you with sufficient information to confirm that the Governing Body understands its role in relationship to the program operations, receives sufficient training for its duties, and is well-informed about how the program functions (this includes receiving regular reports from the grantee staff).

3.2.1.4  Policy Council Interview
The purpose of the Policy Council Interview is to gather information about grantee works with the Policy Council. Your interview will focus on the membership of the Policy Council, how the council is trained, and how grantee staff report to Policy Council and provide them with timely and accurate information that allows them to function in their role according to the Performance Standards. Policy Council members should provide you with sufficient evidence that they are informed of their responsibilities as members and have the information they need to meet the requirements.

3.2.1.5  ECD Coordinator Interview
The purpose of the ECD Coordinator Interview is to take a closer look at the program’s systems for understanding where children are in their development. The ECD Coordinator’s interview should
provide you with details on how the program supports parents in providing a supportive environment for their children, how the program implements an evidence-based curriculum and works toward its school readiness goals, and how the ECD coordinator ensures effective program services.

3.2.1.6 Disabilities Coordinator Interview
The purpose of the Disabilities Coordinator Interview is to ensure that children with disabilities are receiving the appropriate services. The Disabilities Coordinator’s interview should provide you with details about how the program establishes partnerships with Local Education Agencies and how the disabilities coordinator ensures effective program services.

3.2.1.7 Mental Health Services Coordinator Interview
The purpose of the Mental Health Services Coordinator Interview is to ensure that children with mental health concerns are receiving the appropriate services. The Mental Health Services Coordinator’s interview should provide you with details about how the program uses the services of a mental health professional to identify and provide services for children with mental health concerns.

3.2.1.8 Teacher, FCC Provider, Home Visitor Interview
The purpose of the Teacher, FCC Provider, Home Visitor Interview is to ensure that children’s school readiness goals are being met. The Teacher, FCC Provider, Home Visitor interview should provide you with details about how the ECD staff identify children’s level of development and monitor their progress through the year, how they use information to individualize goals for children, and how they share information about children’s mental health concerns with parents.

3.2.1.9 Parent Interview
The purpose of the Parent Interview is to collect information on how parents are being supported as the primary caregivers of their children. The Parent interview should provide you with details about how the program shares information about their children’s developmental strengths and areas for growth and how the program engages the parents in developing goals for their children and promoting their success.

3.2.1.10 FCE Coordinator and FCE Staff Interview
The purpose of the FCE Coordinator and FCE Staff Interview is to identify how parents are being supported as the primary caregivers of their children. The interview should provide you with details about how the program shares information with parents about their children’s mental health and wellness.

3.2.2 Staff File Review (HSKI-C Systems & Services Reviewer)
As mentioned above, the staff file sample roster will be prepared by Danya scheduling staff and uploaded into the Evidence Binder. The HSKI-C Systems & Services Reviewer should give the staff file sample roster to the grantee staff assigned to assist the HSKI-C Review Event. The grantee staff will collect the staff files you need and provide you with a space to begin your file review. When reviewing the staff files, be sure to follow the instructions in the protocol (guidance on the Staff File TQs can be found in the *HSKI-C Tool Guidance for Compliance Measures FY 2015* document posted in the eLearning Center).
At least one staff member from the grantee should be with you at all times during your file review process. Request the assistance of grantee staff if you have trouble locating the needed information in the child file. DO NOT waste time looking for information that is not in the staff file. If it is not there, mark it as such and move on.

### 3.2.3 Closing out the HSKI-C Review Event

After the onsite HSKI-C Review Event activities have been completed, the HSKI-C Reviewers will work with the RFL to close out the review. The RFL may have questions while he or she is doing a final review of the collected information and the EAS selections.

Examples of follow-up questions include:

- Is the evidence factual and verified by an interview, document, or photograph?
- Are all descriptions clearly written and include pertinent details...is anything missing?
- Does all collected information support the EAS selection? Are there contradictions?
- Can the written description be clearly understood by an individual unfamiliar with the situation?
4. Working with the Grantees

When conducting the HSKI-C, remember that this may be a very stressful time for the grantee staff. Patience and flexibility will go a long way in ensuring a smooth visit. The grantee may have questions about the HSKI-C. General information about the HSKI-C and the HSKI-C process was presented in Chapter 1. In addition, the table below presents answers to questions that the grantee may have about the HSKI-C Tool. Reviewers can also direct the staff to the Virtual Expo available online at https://eclkc.ohs.acf.hhs.gov/hslc/grants/monitoring. If the grantee has further questions, reviewers should have the grantee contact the RFL.

4.1 Visiting Sites

4.1.1 Meet With Grantee Staff

Reviewers should arrive at the time and location arranged by the Monitoring Event Coordinator (MEC)/RFL. Grantee programs may have various levels of security. Be prepared to provide multiple forms of ID, sign in/out as required, or enter through a particular entrance. Always wear the provided Danya identification badge while on site.

When you first arrive at the program, meet with the Director and introduce yourself. Answer any questions he/she may have about the HSKI-C. Explain to the Director that they will receive a letter indicating the results of their HSKI-C and that you are not authorized to discuss your findings while on-site. If you are unsure how to answer a Grantee’s question, please refer them to the RFL.

The Grantee will provide a staff escort to make sure someone with knowledge of the center is available while the Reviewer completes the HSKI-C tasks. The role of the Grantee escort is to ensure that Reviewers can efficiently reach the locations for the various interviews, locate the necessary documents for review, assist in staff file review, and answer any questions about the grantee while on site. Please note that the Grantee escort will NOT provide transportation to each facility. Per the Danya Review Requirements and Travel Policies, Reviewers are required to transport themselves to each facility using the Danya-issued rental car and be ready to navigate the distance to the facility independently, as the Grantee is not obligated to provide an escort to the facility.

Grantee staff may have questions about the HSKI-C tool and the new Aligned Monitoring System in general. Example responses to some frequently asked questions are presented in Exhibit 4. Please direct the Grantee to the Virtual Expo for more information about the HSKI-C and the aligned monitoring system process at https://eclkc.ohs.acf.hhs.gov/hslc/grants/monitoring. Reviewers should also direct the Grantee to contact the RFL.

4.1.2 On-Site Interactions With Grantee Staff

When completing your HSKI-C tasks, it is important to be sensitive to the anxiety of Grantee staff. It is important that both HSKI-C Reviewers remain professional and respectful of the Head Start community. Please refrain from using terms such as findings or evidence collection; Reviewers may describe their role as “gathering information for the OHS.”

It is imperative that both HSKI-C Reviewers practice self-awareness during the HSKI-C Review Event. Self-awareness enables Reviewers to identify any potential biases that they might bring into their assessment. The Reviewer should not allow any preconceived stereotypes of the Head Start community to interfere with the assessment to ensure an objective and unbiased review.
It also is important to be aware of any personal hot-button issues such as political beliefs or communication styles of others. At the end of each review day, the Reviewer should reflect on Grantee staff and their responses during the HSKI-C Review Event. It is important for the Reviewer to be perceptive regarding how Grantee staff might interpret the Reviewer’s verbal and non-verbal interactions. For example, a Reviewer might assume that a teacher who appears a certain way speaks another language. It is important that Grantee staff have a positive experience when interacting with the HSKI-C Reviewer, who is acting as a representative of the OHS.

4.1.3 On-Site Interactions With Head Start Children

Reviewers will observe children in various Head Start settings. Children are curious by nature and may ask questions about who the Reviewer is and what he or she is doing in the center. Other children may be interested in the Reviewer’s laptop or phone. Reviewers may also visit settings that include Head Start children with special needs. At least 10 percent of children served by Head Start have diagnosed disabilities.

It is important that Reviewers stay on task and complete their activities as efficiently and objectively as possible and minimize distracting children from their teacher’s direction. It is just as important to treat all children with respect. The Reviewer should acknowledge the children’s comments or requests but politely inform them of the goal to look around the center.

Exhibit 4. Grantee Frequently Asked Questions and Sample Responses

<table>
<thead>
<tr>
<th>Grantee Question</th>
<th>Sample Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What is the HSKI-C?</strong></td>
<td>The Head Start Key Indicator - Compliance (HSKI-C) tool is made up of a subset of the Compliance Measures (CMs) included in the Comprehensive Monitoring protocols. Comprised of 27 CMs, the HSKI-C is designed to determine if a comprehensive review needs to be conducted on a grantee. The HSKI-C includes interviews, document and transaction reviews, and reviews of staff files.</td>
</tr>
<tr>
<td><strong>What is the HSKI-C’s focus?</strong></td>
<td>The HSKI-C’s items focus on: governing body and policy council oversight, management systems, fiscal integrity, and comprehensive services and school readiness.</td>
</tr>
</tbody>
</table>
| **What is in the HSKI-C?** | The HSKI-C includes staff file reviews, document and transaction reviews, and interviews with the following:  
  * Governing Body  
  * Policy council  
  * Head Start/Early Head Start Director  
  * Health Coordinator  
  * Fiscal Officer  
  * ECD Coordinator  
  * Disabilities Coordinator |
| **How does the HSKI-C work?** | • Mental Health Coordinator  
• Teacher, FCC Provider, and/or Home Visitor, and  
• Parents  

Grantees that are scheduled for a review in FY 2015 and demonstrate a history of compliance are eligible to receive the HSKI-C. A grantee’s eligibility for the HSKI-C is determined by whether they demonstrate a history of compliance, which is defined as:  
• A history of compliant reviews including the last monitoring cycle and any other reviews  
• No Fiscal findings in the last **two** monitoring cycles  
• A history of clean annual audits including agency level audits that effect the Head Start program  
• No DRS criteria met, including CLASS (e.g., did not score in the bottom 10% on their last CLASS review)  
• No changes in grantee structure or leadership (including the Fiscal Officer)  
• Positive input by the Regional Office  

If the HSKI-C results in full compliance on all of the HSKI-C CMs, then the grantee continues on Differential Monitoring track.  
If an issue is identified in **any** of the HSKI-C CMs, the grantee would go through the Comprehensive Monitoring process. |
| **Can a grantee receive a deficiency finding during an HSKI-C review?** | The HSKI-C Reviewer is required to report to OHS any circumstances in which children are placed in imminent danger or their health or safety are put at serious risk. Depending on the level of severity of the incident, OHS may choose to issue the grantee an immediate deficiency. |
| **How was the HSKI-C developed?** | The HSKI-C was developed in consultation with an expert from the Pennsylvania State University who has developed similar tools for state licensing of early child care programs. Monitoring data from FY 2012, FY 2013, and FY 2014 were analyzed to identify CMs that were 1) best suited to differentiate between high- and low-performing grantees and 2) tend to be cited in reviews that have the most findings. |
| **Which Grantees will receive an HSKI-C in FY 2015?** | Grantees that are scheduled for a review in FY 2015 and demonstrate a history of compliance are eligible to receive the HSKI-C. A grantee’s eligibility for the HSKI-C is determined by whether they demonstrate a history of compliance, which is defined as:  
• A history of compliant reviews including the last monitoring cycle and any other reviews  
• No Fiscal findings in the last **two** monitoring cycles  
• A history of clean annual audits including agency level audits that effect the Head Start program |
<table>
<thead>
<tr>
<th>What should the grantee do to prepare for the HSKI-C visit?</th>
<th>Prior to the HSKI-C Review Event, every Grantee should view the HSKI-C presentations posted on the Virtual Expo. Each grantee will be assigned a Monitoring Event Coordinator (or MEC) who will be the point of contact for the grantee over the course of its 5-year grant. The MEC will set up the 30 day planning call with the grantee, schedule all interviews and tasks for the on-site review, and collect all pre-site information needed for the HSKI-C Review Event, such as the staff roster for the staff file review. A Review Field Lead (RFL) will oversee the HSKI-C Review Event activities. Prior to the on-site review event, the RFL will contact the grantee, introduce him or herself, and confirm the schedule for the review event. The RFL will be available to answer any questions or concerns the grantee may have while the review event is taking place.</th>
</tr>
</thead>
<tbody>
<tr>
<td>When should I expect the results of my HSKI-C visit?</td>
<td>After the HSKI-C visit is complete, the grantee will receive a letter from the OHS with a determination as to whether the HSKI-C Review Event was successful and what the next steps are.</td>
</tr>
<tr>
<td>Where can I get more information about the HSKI-C?</td>
<td>You can find additional information about the HSKI-C process on the Virtual Expo at <a href="https://eclkc.ohs.acf.hhs.gov/hslc/grants/monitoring">https://eclkc.ohs.acf.hhs.gov/hslc/grants/monitoring</a>.</td>
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</table>

- No DRS criteria met, including CLASS (e.g., did not score in the bottom 10% on their last CLASS review)
- No changes in grantee structure or leadership (including the Fiscal Officer)
- Input by the Regional Office

Grantees who have received a letter from OHS indicating their eligibility will receive a HSKI-C in FY 2015.
### Appendix A – HSKI-C Compliance Measures

#### Program Governance

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.2</strong> 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.</td>
<td></td>
</tr>
<tr>
<td><em>Note: Applies to grantees only</em></td>
<td>642(c)(2)(B)(i)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(B)(ii)(I)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(B)(ii)(II)</td>
</tr>
<tr>
<td><strong>2.1</strong> 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.</td>
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</tr>
<tr>
<td><em>Note: Applies to grantees only</em></td>
<td>642(d)(3)</td>
</tr>
<tr>
<td><strong>2.2</strong> 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.</td>
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<tr>
<td></td>
<td>642(c)(1)(E)(iv)(I)</td>
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<tr>
<td></td>
<td>642(c)(1)(E)(iv)(II)</td>
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<tr>
<td></td>
<td>642(c)(1)(E)(iv)(III)</td>
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<tr>
<td></td>
<td>642(c)(1)(E)(iv)(VI)</td>
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<tr>
<td><strong>2.4</strong> The Policy Council approves and submits decisions about identified program activities to the governing body.</td>
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<tr>
<td><em>Note: Applies to grantees only</em></td>
<td>642(c)(2)(A)</td>
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<td></td>
<td>642(c)(2)(D)(i)</td>
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<td>642(c)(2)(D)(ii)</td>
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<tr>
<td></td>
<td>642(c)(2)(D)(vii)</td>
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<tr>
<td></td>
<td>642(c)(2)(D)(viii)</td>
</tr>
<tr>
<td><strong>3.1</strong> Governing body and Policy Council members regularly receive and use information or reports about program planning, policies, and operations, including:</td>
<td></td>
</tr>
<tr>
<td><em>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 USDA</em></td>
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<td></td>
<td>642(d)(2)(A)</td>
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<td>642(d)(2)(B)</td>
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<td>642(d)(2)(C)</td>
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<td>642(d)(2)(E)</td>
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<td>642(d)(2)(F)</td>
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### Compliance Measures

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
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<tr>
<td>programs</td>
<td>642(d)(2)(G)</td>
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<td></td>
<td>642(d)(2)(H)</td>
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<tr>
<td></td>
<td>642(d)(2)(I)</td>
</tr>
<tr>
<td>The annual financial audit, Self-Assessment (including findings related to such assessment), and Program Information Report (PIR)</td>
<td></td>
</tr>
<tr>
<td>The community-wide strategic planning and needs assessment (the Community Assessment) of the Head Start agency, including applicable updates</td>
<td></td>
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<tr>
<td>Communication and guidance from the Secretary</td>
<td></td>
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</tbody>
</table>

*Note: Applies to grantees only. Single or multiple reports may be used to capture the information listed above.*

### Management Systems

<table>
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<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2 At least annually, the program conducts a Self-Assessment of program effectiveness that:</td>
<td>641A(g)(1)</td>
</tr>
<tr>
<td>• Assesses progress in meeting local program goals and objectives</td>
<td>641A(g)(2)(B)</td>
</tr>
<tr>
<td>• Evaluates program compliance with Federal requirements</td>
<td></td>
</tr>
<tr>
<td>• Results in improvement plans</td>
<td></td>
</tr>
</tbody>
</table>

| 2.1 The program established and implements procedures for the ongoing monitoring of its operations and services to ensure compliance. The program’s ongoing monitoring: | 641A(g)(3) |
| • 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 |  |

| 3.2 The program develops and implements written standards of conduct that are available to all staff and contain provisions for appropriate penalties when violations occur. | 1304.52(i)(1) |
| • 1304.52(i)(1)(i) | 1304.52(i)(1)(ii) |
| • 1304.52(i)(1)(iv) | 1304.52(i)(3) |

*Note: 1304.52(i)(1)(iii) was removed from this section and is now located in CHS 5.5.*

| 5.1 The program establishes and maintains a record-keeping system that supports the delivery of services to children and families. The program: | 1304.51(g) |
| • Consistently collects and records data in an accurate and timely manner |  |
### Compliance Measures

<table>
<thead>
<tr>
<th>Compliance Measures</th>
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</tr>
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<tbody>
<tr>
<td>manner for children, families, and staff</td>
<td></td>
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<tr>
<td>• Generates reports to inform planning, communication, and ongoing monitoring</td>
<td></td>
</tr>
<tr>
<td>• Makes information accessible to appropriate parties</td>
<td></td>
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<tr>
<td>• Maintains confidentiality</td>
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</tbody>
</table>

#### 5.2

The program publishes and makes available to the public an Annual Report that contains:

- 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)                                                                         |

### Comprehensive Services and School Readiness

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5 The program has established procedures for tracking the provision of health services.</td>
<td>1304.20(a)(1)(ii)(C)</td>
</tr>
<tr>
<td>1.7 The program ensures that a health staff member visits each newborn within two weeks after birth to ensure both the mother's and the child's well-being.</td>
<td>1304.40(i)(6)</td>
</tr>
</tbody>
</table>

*Note: Applies only to programs serving pregnant women and new mothers*

| 1.7                                                                 | 1304.40(i)(6) |

#### 2.1

The program provides educational opportunities for parents to enhance their parenting skills that include:

- Understanding the educational and developmental needs of their children
- Sharing concerns and observations about their children with program staff

| 2.1                                                                 | 1304.40(e)(2) |
| 2.1                                                                 | 1304.40(e)(3) |

#### 2.2

Program 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

| 2.2                                                                 | 1304.24(a)(1)(i) |
| 2.2                                                                 | 1304.24(a)(1)(ii) |
| 2.2                                                                 | 1304.24(a)(1)(iii) |
| 2.2                                                                 | 1304.24(a)(1)(iv) |

#### 2.3

The program makes provisions for mental health program services for parents and staff that include:

- Staff and parent education on mental health issues
- On-site mental health consultation with mental health professionals
- Activities promoting children's mental wellness

<p>| 2.3                                                                 | 1304.24(a)(3)(ii) |</p>
<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.3 The program coordinates with and has current Interagency Agreements in place</td>
<td>1304.41(a)(4)</td>
</tr>
<tr>
<td>with Local Education Agencies (LEAs) and other agencies (Part C) within the</td>
<td>1308.4(l)(3)</td>
</tr>
<tr>
<td>service area.</td>
<td>1308.4(l)(4)</td>
</tr>
<tr>
<td></td>
<td>1308.4(l)(5)</td>
</tr>
<tr>
<td></td>
<td>1308.4(l)(7)</td>
</tr>
<tr>
<td>1.2 The program has a system and processes in place to do the following in order to</td>
<td>1307.3(b)(2)(i)</td>
</tr>
<tr>
<td>track, use, and report progress on school readiness goals:</td>
<td>1307.3(b)(2)(ii)</td>
</tr>
<tr>
<td>Aggregate and Analyze the following:</td>
<td></td>
</tr>
<tr>
<td>• Individual, ongoing child-level assessment data for all children birth to age 5</td>
<td></td>
</tr>
<tr>
<td>• Child-level data at least three times a year using data from one or more</td>
<td></td>
</tr>
<tr>
<td>valid and reliable assessment tools</td>
<td></td>
</tr>
<tr>
<td>• For programs serving dual-language learners (DLLs):</td>
<td></td>
</tr>
<tr>
<td>• Status and progress in acquiring the knowledge and skills described in the</td>
<td></td>
</tr>
<tr>
<td>Head Start Child Development and Early Learning Framework (demonstrated in any</td>
<td></td>
</tr>
<tr>
<td>language, including the child’s home language) and toward learning English.</td>
<td></td>
</tr>
<tr>
<td>In order to use school readiness data:</td>
<td></td>
</tr>
<tr>
<td>• Combine input from parents and families with assessment data to determine each</td>
<td></td>
</tr>
<tr>
<td>child’s status and progress in the five essential domains</td>
<td></td>
</tr>
<tr>
<td>• Individualize experiences, instructional strategies, and services to best</td>
<td></td>
</tr>
<tr>
<td>support each child</td>
<td></td>
</tr>
<tr>
<td>• In combination with other program data, determine progress towards meeting</td>
<td></td>
</tr>
<tr>
<td>program goals</td>
<td></td>
</tr>
<tr>
<td>• Assess the fidelity of implementation of the curriculum</td>
<td></td>
</tr>
<tr>
<td>• Direct continuous improvement related to the effectiveness of curriculum,</td>
<td></td>
</tr>
<tr>
<td>instruction, professional development, and program design or other program</td>
<td></td>
</tr>
<tr>
<td>decisions based on the analysis of school readiness outcomes data</td>
<td></td>
</tr>
<tr>
<td>Report Results</td>
<td></td>
</tr>
<tr>
<td>• To inform parents and the community of the program’s progress in</td>
<td></td>
</tr>
<tr>
<td>achieving school readiness goals</td>
<td></td>
</tr>
<tr>
<td>Note: Programs in operation fewer than 90 days are required to have a system to</td>
<td></td>
</tr>
<tr>
<td>aggregate and analyze data at least twice during their program operation period.</td>
<td></td>
</tr>
<tr>
<td>2.1 The program selects and implements a curriculum that is evidence-based and</td>
<td>642(f)(3)(C)</td>
</tr>
<tr>
<td>is linked to ongoing assessment, with developmental and learning goals and</td>
<td></td>
</tr>
<tr>
<td>measurable objectives.</td>
<td></td>
</tr>
</tbody>
</table>
### Compliance Measures

<table>
<thead>
<tr>
<th>3.1</th>
<th>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. <strong>Note:</strong> Screenings results used for referring children for future evaluation is captured in Child Health and Safety and does not apply to individualizing in CDE.</th>
<th>1304.20(f)(1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.4</td>
<td>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.</td>
<td>1304.24(a)(3)(i) 1304.24(a)(2)</td>
</tr>
</tbody>
</table>

### Fiscal Integrity

<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>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. <strong>45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.</strong> <strong>Note:</strong> This question relates to the &quot;control activities&quot; aspect of internal controls. Control activities are the policies, procedures, techniques, and mechanisms that enforce management directives, such as the process of adhering to requirements for budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity’s planning, implementing, and reviewing, as well as accountability for stewardship of Government resources and achieving effective results.</td>
</tr>
<tr>
<td>Compliance Measures</td>
<td>Federal Regulations</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------</td>
<td>-------------------------------------</td>
</tr>
</tbody>
</table>
| **2.1** 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:  
  - SF-425 (paper-based Federal Financial Report filed to 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.  
  **45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, nonprofit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments.** | 74.21(b)(1)  
  74.21(b)(2)  
  92.20(b)(1)  
  92.20(b)(2)  
  1304.23(b)(1)(i)  
  1304.51(h) |
| **4.1** 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)(2)  
  230, App B(8)(m)(1)  
  230, App B(8)(m)(2) |
| **5.3** 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.  
  **45 CFR Part 74 for institutes of higher education (colleges and universities), hospitals, non-profit organizations and commercial organizations; 45 CFR Part 92 for State, local, and Tribal Governments. Note: The use of cash and in-kind contributions must meet the same standards applicable to an expenditure of grant funds. They must support the accomplishment of program objectives and not benefit individual children or their families.** | 74.23(a)(1)  
  74.23(a)(2)  
  74.23(a)(3)  
  74.23(a)(4)  
  74.23(a)(5)  
  74.23(d)  
  74.23(f)  
  74.23(h)(1)  
  74.23(h)(2)  
  74.23(h)(3)  
  74.23(i)(1)  
  74.23(i)(2)  
  92.24(a)(1)  
  92.24(b)(1)  
  92.24(b)(3)  
  92.24(b)(6) |
<table>
<thead>
<tr>
<th>Compliance Measures</th>
<th>Federal Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.2</td>
<td>92.24(b)(7)(i)</td>
</tr>
<tr>
<td></td>
<td>92.24(b)(7)(iv)</td>
</tr>
<tr>
<td></td>
<td>92.24(c)(1)</td>
</tr>
<tr>
<td></td>
<td>92.24(d)</td>
</tr>
<tr>
<td></td>
<td>92.24(e)(2)(i)</td>
</tr>
<tr>
<td></td>
<td>92.24(g)</td>
</tr>
</tbody>
</table>

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 mortgage or loan agreements using real property or equipment acquired with Head Start funds.

|                     | 74.34(f)(1)         |
|                     | 74.34(f)(3)         |
|                     | 74.34(g)            |
|                     | 74.37               |
|                     | 92.32(d)(1)         |
|                     | 92.32(d)(2)         |
|                     | 92.32(e)            |
Welcome & Introductions
Introductions: Training Staff

• Bert Sorongon
  – Doctorate in Developmental Psychology
  – Worked on other large scale Head Start and early education data collections (e.g., FACES, HSIS)
  – Married for 13 years and has an 11 year-old daughter

Introductions: Training Staff

• Sherry Fahmi
  – B.A. in Government and International Politics from GMU
  – Working for Head Start for 2.5 years
  – Taught preschool for 4 years
  – Enjoys traveling to new places
Introductions

• Reviewers:
  – Your name
  – How long you have worked in Head Start
  – One fun fact about you

Session #1 Agenda

• Welcome & Introductions
• Overview of the HSKI-C Protocol
• Review of HSKI-C Compliance Measures
• Review of HSKI-C onsite tasks
• Q & A

House Rules

- Raise your hand to ask questions or type questions into the chat box
- Turn off your cell phones, televisions, radios, iPods, iPads, Xboxs, etc.
- Please mute your phones (except when you want to say something!)
Recap: the OHSMS HSKI-C Tool

- The **OHSMS HSKI-C Tool** is:
  - An evidence-based, differential monitoring tool used to determine the monitoring track for grantees
  - Comprised of 27 Compliance Measures

HSKI-C Key Indicators

- The HSKI-C covers 4 content areas:
  - Management Systems
  - Program Governance
  - Comprehensive Services & School Readiness
  - Fiscal Integrity*

* We will not be covering the details of the Fiscal CMs in this training. For information on the Fiscal CMs please refer to training modules in the E-Learning Center.
Compliance Measures: Refresher

If you identified a concern with the program’s Annual Report, which CM would you indicate that under?

A. Program Governance 2.2
B. Management Systems 5.2
C. Child Health and Safety 1.5
D. Family and Community Engagement 2.3

Compliance Measures: SYS 5.2

<table>
<thead>
<tr>
<th>Compliance Measure</th>
<th>Federal Regulation</th>
</tr>
</thead>
</table>
| The program publishes and makes available to the public an Annual Report that contains:  
  • 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) |
Compliance Measures: Refresher

When interviewing the Policy Council on their involvement in the grantee’s decision making process, which CM does this information inform?

A. Management Systems 3.2
B. Child Development and Education 3.4
C. Program Governance 2.4
D. Family and Community Engagement 5.3

Compliance Measures: GOV 2.4

<table>
<thead>
<tr>
<th>Compliance Measure</th>
<th>Federal Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Policy Council approves and submits decisions about identified program activities to the governing body. Note: Applies to grantees only</td>
<td>642(c)(2)(A)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(i)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(ii)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(iii)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(iv)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(v)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(vi)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(vii)</td>
</tr>
<tr>
<td></td>
<td>642(c)(2)(D)(viii)</td>
</tr>
</tbody>
</table>
Compliance Measures: Refresher

What program information is collected to inform CHS 1.7?

A. Health Screenings for Children
B. Health Tracking System
C. Visiting newborns and their mothers
D. Hand-washing practices in the classroom

Compliance Measures: CHS 1.7

<table>
<thead>
<tr>
<th>Compliance Measure</th>
<th>Federal Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>1304.40(i)(6)</td>
</tr>
</tbody>
</table>

Note: Applies only to programs serving pregnant women and new mothers.
Compliance Measures: Refresher

During the Teacher/FCC/Home Visitor interview, you will ask about how information is shared with parents regarding a child’s behavior and mental health. Which of the following CMs aligns with that information?

A. Management Systems 5.1  
B. Child Development and Education 4.1  
C. Program Governance 3.4  
D. Family and Community Engagement 2.2

Compliance Measures: FCE 2.2

<table>
<thead>
<tr>
<th>Compliance Measure</th>
<th>Federal Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program staff:</td>
<td>1304.24(a)(1)(i)</td>
</tr>
<tr>
<td>• Educate parents about how to strengthen and nurture supportive environments and relationships in the home and at the program</td>
<td></td>
</tr>
<tr>
<td>• Identify appropriate responses to children’s behaviors</td>
<td></td>
</tr>
<tr>
<td>• Encourage parents to share concerns and observations about their children’s mental health</td>
<td></td>
</tr>
<tr>
<td>• Share observations with parents regarding their children’s behavior and development</td>
<td>1304.24(a)(1)(ii)</td>
</tr>
<tr>
<td></td>
<td>1304.24(a)(1)(iii)</td>
</tr>
<tr>
<td></td>
<td>1304.24(a)(1)(iv)</td>
</tr>
</tbody>
</table>
Compliance Measures: Refresher

- Child Development and Education (CDE) 1.2 covers which of the following topic areas:
  
  A. Individualization
  B. School Readiness
  C. Teacher Qualifications
  D. Curriculum

HSKI-C Compliance Measures

- Program Governance
  - Established Policy Council with correct composition (1.2)
  - Training for GB and PC (2.1)
  - GB and PC responsibilities for program administration and operations (2.2/2.4)
  - Reporting to the GB and PC (3.1)

- Management Systems
  - Annual Self-Assessment (1.2)
  - Ongoing Monitoring (2.1)
  - Standards of Conduct (3.2)
  - Criminal Record Checks (3.4)
  - Record-keeping (5.1)
  - Publication and availability of an Annual Report (5.2)
HSKI-C Compliance Measures

– Comprehensive Services & School Readiness

  • System to track, use and report on school readiness goals (CDE 1.2)
  • Evidence-based curriculum (CDE 2.1)
  • Individualization (CDE 3.1)
  • Communication with parents on resources and progress of their child (FCE 2.1/2.2)
  • Child access to mental health services (CDE 3.4/FCE 2.3)
  • Teacher qualifications (CDE 4.1)
  • Health services tracking system (CHS 1.5)
  • Visits for newborns and their mothers within 2 weeks of birth (CHS 1.7)
  • Partnerships with LEAs and Part C agencies (FCE 5.3)

HSKI-C Onsite Tasks

• Onsite tasks
  – Interviews:
    • Head Start Director
    • Governing Body
    • Policy Council
    • Mental Health Coordinator
    • ECD Coordinator
    • Joint School Readiness
    • Teacher/HV/FCC
    • FCE Coordinator & Staff
    • Parent
    • Disabilities Coordinator
    • Health Services Coordinator
  – Document review:
    • Staff files
Logistics and Scheduling

• Staff file sample list will be prepared for you and uploaded to the evidence binder
• Interview schedule will also be prepared for you
• RFL will email you with details of interview schedule and other grantee information prior to arrival onsite

Interviews
Interview Training Points

- Interviews:
  - Important to answer each TQ fully
  - Address each bullet in your interview and notes
  - Ask follow up questions when needed
  - Ask for specific examples when information is unclear
  - Answer blue summary TQ

Interviews: Head Start Director Interview

- Purpose of the interview
  - Discuss specific aspects of the program’s management systems

- CMs covered in this interview
  - SYS 1.2: Self-Assessment under Program Planning
  - SYS2.1: System of Ongoing Monitoring
  - SYS2.3: Standards of conduct under Human Resources
  - SYS3.4: Criminal record Checks under Human Resources
  - SYS 5.1: System for Record-Keeping and Reporting
  - SYS 5.2: Annual Report under Record-Keeping and Reporting
Interviews: Head Start Director Interview

• Example TQ:

Management Systems Key Indicator #2 - Ongoing Monitoring
Describe the program’s Ongoing Monitoring system.
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

Does the program’s ongoing monitoring system include all of the key elements and support the delivery of services to children and families?

SYS2.1

“We use Child Plus to track screenings and health forms for the children, we have a data person who monitors the deadlines and timeframes for those things weekly to make sure we are getting the information we need for the children and completing their screenings on time. We also have a facilities form that staff can fill out regarding any maintenance issues. Those get submitted electronically and are reviewed by the facilities manager as they are submitted to ensure that any safety concerns are dealt with immediately.”
Interviews: Multiple Person Interviews

- Allow everyone an opportunity to speak
- Rephrase TQs to ensure everyone in the group understands
- Probe in order to get more than one perspective

Interviews: Governing Body (GB)

- Purpose of the interview
  - Collect information on the program’s governance

- CMs covered in this interview
  - GOV 2.1: Training for the GB
  - GOV 2.2: GB’s role in program planning
  - GOV 3.1: Reporting to the GB
Interviews: Policy Council (PC)

• Purpose of the interview
  – Collect information on the Policy Council’s membership and oversight

• CMs covered in this interview
  – GOV 1.2: Composition of the PC
  – GOV 2.1: Training for the PC
  – GOV 2.4: PC’s role in program oversight
  – GOV 3.1: Reporting to the PC

Interviews: Policy Council Interview

• Example TQ:

  Describe whether the Policy Council receives the training necessary to fulfill their responsibilities.
  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 to describe the training they received and provide examples of how the training has helped them make decisions about the Head Start program.

  The policy council has two trainings a year, one at the start of the year and one in the middle of the year, both are done by the H5 Director and cover different topic areas such as oversight and budget, and the self-assessment. Two meeting agendas confirm this training took place on 9/28 and 2/15.

  Does the training provide information relevant to the Policy Council’s roles and responsibilities?  
  ![Yes](Yes) ![No](No)

  GOV2.1
Interviews: School Readiness Joint Interview

• Purpose of the interview
  – Assess how the program aggregates and analyzes SR data
  – How SR data is used to help make progress towards SR goals
  – The program’s improvements in the following areas:
    • Curriculum and instruction
    • Professional development
    • Program design
  – The program’s SR approach for Dual Language Learners

• CMs covered in this interview
  – CDE 1.2: School Readiness: aggregating and analyzing data, using data to make improvements

School Readiness: EAS Sections

• Aggregate and Analyze School Readiness Data:
• Use School Readiness Data:
  – Language and Literacy Development
  – Cognition and General Knowledge
  – Approaches to Learning
  – Physical Development and Health
  – Social and Emotional Development
  - In combination with other program data to determine progress towards meeting program goals
  - To assess the fidelity of implementation of the curriculum
  - To direct continuous improvement related to the effectiveness of curriculum, instruction, professional development, and program design or other program decisions based on the analysis of school readiness outcomes data
  - To inform parents and the community of the program’s progress in achieving school readiness goals
Interviews: School Readiness Joint Interview

Child Development & Education Key Indicator #1 - School Readiness

Describe the process the program uses to aggregate and analyze child-level assessment data, and how they use the data for program improvement.

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 HS)?

The program has not yet aggregated any data for this school year.

Did the program complete the required aggregated data analysis?  Yes  No

CDE1.2

Interviews: School Readiness Joint Interview

Does the program have a plan to complete the required aggregate data analyses?

List the months the program plans to complete the required aggregate data analyses.

Programs are required to aggregate and analyze individual, ongoing child-level assessment data a minimum of three times per year (two times for programs operating shorter durations).

CDE1.2
Interviews: School Readiness Joint Interview

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.)

Does the program use the aggregate data analysis to assess progress towards school readiness goals?  
Select N/A if the program has not completed the required aggregate data analyses.

CDE1.2

Interviews: School Readiness Joint Interview

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

Does the program direct continuous improvement related to curriculum and instruction, professional development, program design, and other program decisions.

CDE1.2
### Interviews: ECD Coordinator

**• Purpose of the interview**
- Determine the availability and quality of resources provided by the program to support parents.
- Assess the program’s Curriculum

**• CMs covered in this interview**
- FCE 2.2: supporting parents in building relationships with their children
- FCE 2.3: Educating parents on mental health issues
- CDE 2.1: Curriculum selection and implementation

### Interviews: ECD Coordinator

**• Example TQ**

<table>
<thead>
<tr>
<th>Ask the ECD Coordinator to indicate whether the selected curriculum/curricula:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• 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</td>
</tr>
<tr>
<td>• Is linked to ongoing assessment</td>
</tr>
<tr>
<td>• Includes developmental and learning goals appropriate for the ages of children and program option</td>
</tr>
<tr>
<td>• Includes measurable objectives</td>
</tr>
</tbody>
</table>

Based on your conversation with the ECD Coordinator, indicate whether the selected curriculum (curricula):

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>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</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Includes measurable objectives</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Interviews: FCE Coordinator and FCE Staff

• Purpose of the interview
  – To collect data on the program’s resources for mental health for families and staff

• CMs covered in this interview
  – FCE 2.3: Mental health resources for families and staff

### Family & Community Engagement Key Indicator #2 - Parent-Child Relationships

**Describe how the program informs and educates parents and staff about mental health.**

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.

<table>
<thead>
<tr>
<th>Did the program provide education on mental health issues?</th>
</tr>
</thead>
<tbody>
<tr>
<td>FCE2.3</td>
</tr>
</tbody>
</table>
Interviews: Mental Health Coordinator

• Purpose of the interview
  – To gather information regarding the program's mental health services as it pertains to individualizing services for children
  – Determine the accessibility of a Mental Health Consultant

• CMs covered in this interview
  – CDE 3.4: Mental health resources for families and staff

Interviews: Mental Health Coordinator

• Example TQ

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.

*Note: This question applies to Coordinator if the program does not have a Mental Health Consultant.*

Are the services provided by the consultant (or Coordinator) frequent and sufficient according to the needs of the program? Is the Consultant involved in the design and implementation of the program?

☐ Yes  ☐ No
Interview: Disabilities Coordinator

• Purpose of the interview
  – To gather information regarding the program’s disabilities services as it pertains to individualizing for children

• CMs covered in this interview
  – FCE 5.3: Partnerships with LEAs and Part C agencies to provide services to children
  – SYS 2.1: Ongoing Monitoring: providing high quality services tailored for children with disabilities

Interviews: Disabilities Coordinator

• Example TQ

Family & Community Engagement Key Indicator #5 - Community Partnerships

Describe how the program coordinates with Local Education Agencies (LEAs) and Part C agencies to provide services to children.

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, IEP/IFSP meetings, and placement decisions
  • Transitions
  • File- and resource sharing (school readiness goals and assessment information)
  • The current program year, with appropriate signatures and dates

Has the grantee developed Interagency Agreements with LEAs and other agencies that contain the required components?

FCEO.3
Interview: Health Coordinator

• Purpose of the interview
  – To gather information regarding the program’s health tracking system

• CMs covered in this interview
  – CHS 1.5: A comprehensive health tracking system
  – CHS 1.7: Visiting newborns and their mothers
  – SYS 2.1: Ongoing Monitoring: delivering services to children, defining staff roles and using data to make program improvements

Interviews: Health Coordinator

- Child Health & Safety Key Indicator #1 - Access to Health and Dental Care
  Describe how the program uses a tracking system to track the provision of Health services.
  With the Coordinator, review the program’s health tracking system. Ask how often the system is updated and what 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 may be different in the different sources.

Does the program’s tracking system contain accurate and necessary information that includes all required components?
Interview: Parent

• Purpose of the interview
  – To collect data on the resources and communications available to parents through the program
  – To validate information gathered from the Head Start Director and other coordinators regarding communication with parents

• CMs covered in this interview
  – FCE 2.1: Educational resources for parents

---

Interview: Parent

Family & Community Engagement Key Indicator #2 - Parent-Child Relationships

Describe how the program provides educational opportunities for parents to enhance their parenting skills.

Ask parents to discuss the following:
• What types of information have they 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 provided opportunities to share concerns about their children’s development
• The information the program shared about how they, as parents, can help promote their children’s success as they get ready to enter school

Does the program ensure that parents have an opportunity to enhance their parenting skills and foster the growth and development of their children?

FCE 2.1

---
Interview: Teacher/FCC Provider/Home Visitor

• Purpose of the interview
  – To collect data on the resources and communications available to parents through the program
  – To validate information gathered from the Head Start Director and other coordinators regarding communication with parents

• CMs covered in this interview
  – FCE 2.1: Educational resources for parents
  – FCE 2.2: Sharing concerns regarding Mental Health
  – CDE 1.2: Child-level assessment data used to support child development
  – CDE 3.1: Individualizing for children to make progress towards goals

Interview: Teacher/FCC Provider/Home Visitor

• Example TQ

<table>
<thead>
<tr>
<th>Child Development &amp; Education Key Indicator #1 - School Readiness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ask ECD staff to describe how they do the following (ask for specific examples, and document them in your notes.):</td>
</tr>
<tr>
<td>• Use ongoing child-level assessment data to identify children’s levels of development</td>
</tr>
<tr>
<td>• Provide experiences to support children’s development</td>
</tr>
<tr>
<td>• Monitor children’s progress throughout the program year</td>
</tr>
</tbody>
</table>

Do staff use child-level data to plan for children’s development and progress? Yes No

CDE 1.2
Staff Files Review

Document Review: Staff Files

• Purpose of the Staff File Review
  – To determine whether or not the grantee completed CRCs for every staff person prior to hire
  – To assess the qualifications of preschool and infant/toddler teachers

• CMs covered in this interview
  – SYS 3.4: Criminal Record Checks
  – CDE 4.1: Teacher Qualifications
Document Review: Staff Files

• Background Questions

| Name: |  |
| Title: |  |
| Name of Grantee or Delegate: |  |
| Center/Provider Name: |  |
| Class/Group Name: |  |
| Hire Date (for current position): | 8/1/2014 |
| Full-time or Part-time Employee: | Full-time |
| Employed or Contracted: | Employed |

Select Type of Staff:
- Bus Driver
- Disabilities Services Coordinator
- ERSEA Coordinator
- FCC Provider
- FCC Staff
- Head Start/Early Head Start Director
- Home Visitor
- Nutrition Services Coordinator
- Teacher - Preschool
- Transportation Services Coordinator
- Bus Monitor
- ECD Coordinator
- Facilities Coordinator
- FCE Coordinator
- Food Preparation Staff
- Health Services Coordinator
- Mental Health Services Coordinator
- Teacher Aide
- Teacher - Infant and Toddler

• Example TQ

Management Systems Key Indicator #3 - Human Resources

Did the program obtain one of the following for the employee?  
- A State, Tribal, or Federal criminal record check covering all jurisdictions in which the grantee provides Head Start services to children  
- A State, Tribal, or Federal criminal record check as required by the law of the jurisdiction in which the grantee provides Head Start services  
- A criminal record check as otherwise required by Federal law

SYS3.4  

Was the employee hired within the last 12 months?  
- Yes  
- No

Was the criminal record check conducted prior to employment?  
- Yes  
- No  
- N/A

SYS3.4
Document Review: Staff Files

• Example TQ

![Child Development and Education Compliance Framework #4 - Quality Teaching & Learning](image)

Please enter the qualification of the infant-toddler teacher:
- A minimum of a current Child Development Associate (CDA) credential and have been trained (or have equivalent coursework) in early childhood development with a focus on infant and toddler development.
- Does not meet qualifications.

Please list the qualifications of this teacher.

Is there a professional development plan on file?
- Yes
- No
- N/A

Select N/A only if (1) the staff member is a new hire AND (2) the staff person already meets the required qualifications.

Is the professional development plan designed to ensure attainment of qualifications or is the staff person currently enrolled in a degree program?
- Yes
- No

Enter the date of expected acquisition of teacher qualifications:

Completing the HSKI-C Onsite Tasks
Completing the HSKI-C

- Strategies for completing all tasks:
  - Know the protocol
  - Be flexible
  - Grantee staff to assist with file review
  - Be on time to every interview

- If you have concerns about completing your onsite tasks contact your Review Field Lead (RFL)

Practice Exercises

- Posted on the e-Learning center
- Scripts for self-guided practice
- Use “Sample Review” in the software to review the guides
Resources & Support

• HSKI-C Reviewer Field Guide
• HSKI-C Compliance Measure Guidance Document
• FAQ Document
Wrap-Up

• Practice using the software and reviewing TQs in each guide on your own
• Use provided practice exercises
• Come back on Friday the 19th at 12:30 for Session #2

Time to say goodbye.
Head Start Key Indicator - Compliant

(HSKI-C) Training: Systems & Services

Reviewers

Session #2

This information is considered to be privileged information per Exemption (b)(4) under FOIA and not releasable per 5 U.S.C. § 552(b).
Session #2 Agenda

• Welcome
• Review of practice exercises
• Data analysis & EAS Selection
• Q & A

House Rules

▪ Raise your hand to ask questions or type questions into the chat box
▪ Turn off your cell phones, televisions, radios, iPods, iPads, Xboxes, etc.
▪ Please mute your phones (except when you want to say something!)

Practice Exercises

• What were some challenges or questions you had during your practice?
Data Analysis & EAS Selection

- Complete all TQs in guides
- Follow up with grantee staff to gain deeper understanding, as needed
- Review evidence on protocol page
- Select the EAS criteria that aligns with evidence
Program Governance 1.2

• Evidence Collection:
  – Policy Council Interview

- Evidence Assessment for 642(c)(2)(B)(i), 642(c)(2)(B)(ii)
  - The Policy Council is composed of at least 51 percent of parents of children currently enrolled in the Head Start program (including any delegate agencies).
    - AND
  - The Policy Council includes at least one member of the at-large community served by the program or any delegate agency.
    - AND
  - Policy Council members are elected by parents of currently enrolled children.

- The Policy Council does not include the following (select all that apply):
  - Members of the at-large community served by the program or any delegate agency. This may include parents of children formerly enrolled but not parents of children currently enrolled in the program.
  - At least 51 percent parents of children currently enrolled in the Head Start program (including any delegate agencies).
  - Members elected by parents of currently enrolled children.

- There is no Policy Council.
- The program has prohibited the formation of a Policy Council.
Program Governance 2.1

• Evidence Collection:
  – Policy Council Interview
  – Governing Body Interview

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

  This question has not been answered yet. Show All

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

  This question has not been answered yet. Show All

Program Governance 2.1

• EAS Selection

  Evidence Assessment for 642(d)(3)
  ➢ The program provided training and technical assistance (T/TA) to the members of the governing body and the Policy Council, and the T/TA assisted them in making decisions and overseeing and participating in the Head Start program.

  The program provided T/TA to the members of the governing body and the Policy Council; however, the T/TA did not assist them in making decisions or in overseeing and participating in the Head Start program.

  The program did not provide T/TA to members of the governing body or the Policy Council.

  The program did not provide T/TA to members of the governing body or the Policy Council, AND there is evidence that the lack of training is impeding program operations.
Data Analysis & EAS Selection

• CMs that follow the same EAS pattern:
  – GOV 1.2 - CHS 1.5
  – GOV 2.1 - CHS 1.7
  – GOV 2.2 - FCE 2.1
  – GOV 2.3 - FCE 2.2
  – GOV 3.1 - FCE 2.3
  – SYS 1.2 - FCE 5.3
  – SYS 3.2 - CDE 2.1
  – SYS 5.1 - CDE 3.1
  – SYS 5.2 - CDE 3.4

Data Analysis & EAS Selection

• SYS 2.1 – Ongoing Monitoring
  – Head Start Director
  – ECD Coordinator
  – Health Services Coordinator
  – Disabilities Coordinator
Management Systems 2.1

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

This question has not been answered yet.

ECD 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?

This question has not been answered yet. Show All

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?

This question has not been answered yet. Show All

Disabilities Coordinator — Interview

How do you:
- Monitor your program area to ensure high quality services are tailored to meet the individual and specialized needs of children with disabilities?
- Define staff roles and responsibilities in monitoring your program area?
- Collect and use data for planning activities and to change practices as needed?

This question has not been answered yet. Show All

Evidence Assessment for 641A(g)(3)

The program’s ongoing monitoring system supports the delivery of services to children and families. The program:
- Uses effective tools and procedures to ensure it 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 of delegate agencies takes place

The program’s ongoing monitoring system does not effectively support the delivery of services to children and families. The program does not (select all that apply):
- 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

The program has not implemented any monitoring procedures.

OR

The evidence from the service area shows significant service issues that are the result of the program’s failure to implement ongoing monitoring procedures.
Data Analysis & EAS Selection

• SYS 3.4 – Criminal Record Checks
  – Staff File Review
  – Head Start Director Interview
Management Systems 3.4

1. Was the employee hired within the last 12 months? Was the criminal record check conducted prior to employment?

- 1 of 3 (33%) employees hired within the past 12 months did not complete a criminal record check prior to employment.

- 11/13/2014 10:46:19 AM - Sherry Fahmi
  - Test 5 - teacher - Hire Date: 11/23/2014 Full-time Employed Staff
  - Was this staff member hired within the last 12 months? Answer: Yes
  - Was the criminal record check conducted prior to employment? Answer: Yes

- 11/13/2014 10:43:18 AM - Sherry Fahmi
  - Test 3 - teacher - Hire Date: 11/12/2014 Full-time Employed Staff
  - Was this staff member hired within the last 12 months? Answer: Yes
  - Was the criminal record check conducted prior to employment? Answer: No
  - Notes: The CRC was completed 3 days after the documented start date.

- 11/11/2014 4:40:15 PM - Sherry Fahmi
  - Test 1 - - Hire Date: 11/13/2014 Full-time Employed Staff
  - Was this staff member hired within the last 12 months? Answer: Yes
  - Was the criminal record check conducted prior to employment? Answer: Yes

Head Start/Early Head Start Director - Interview/Debrief

- If any staff members did not have 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.

- No concerns in 1. Show Concerns Only

- 11/13/2014 11:48:34 AM - Sherry Fahmi
  - No Title Provided
  - There was an issue identified in the staff files. The HS director indicated that it was one incident where the CRC was done but the results had not come in prior to the teacher’s hire date. The director confirmed that the information in the file was accurate and that the CRC was indeed completed after the teacher’s first day. They corrected this issue by removing the hire date for each employee (as part of an adjusted process) to say “upon completion of the CRC- a hire date will be assigned.”
Management Systems 3.4

• EAS Selection

**Evidence Assessment for 648A(g)(3)(A-C)**

- Before the Head Start agency employs an individual, it obtains one of the following for each employee:
  - A State, Tribal, or Federal criminal record check covering all jurisdictions in which the grantee provides Head Start services to children
  - A State, Tribal, or Federal criminal record check as required by the law of the jurisdiction in which the grantee provides Head Start services
  - A criminal record check as otherwise required by Federal law

- One or more employees hired within the past 12 months did not complete a criminal record check prior to employment.

- One or more employees did not receive a criminal record check at any time.
Data Analysis & EAS Selection

• CDE 1.2 School Readiness
  – Joint interview with ECD Coordinator & Head Start Director
  – Interview with Teachers/Home Visitors/FCC Providers
Child Development & Education 1.2

• CDE 1.2 EAS: First Radio Button

Evidence Assessment for 1307.3(b)(2)(I-ii)

- The program has a system and processes in place to:
  - Aggregate and analyze data
  - Use school readiness data to determine each child's status, individualize experiences, and inform ongoing program improvement
  - Report results to parents and the community

• CDE 1.2 EAS:

The program does not do the following in order to track and report progress on school readiness goals (check all that apply):

Aggregate and Analyze Data:

- Individual, ongoing child-level assessment data for all children birth to age 5 (e.g., home-based, center-based, FCC, EHS, and HS)

- For programs serving dual-language learners (DLLs), determines 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) and toward learning English

- Child-level data at least three times a year using data from one or more valid and reliable assessment tools (programs in operation less than 90 days have a system to aggregate and analyze child-level assessment data at least two times during the period of program operation)
Use School Readiness Data:

In combination with input from parents and families to determine each child’s status and progress in the five essential domains (select missing domains):

- Language and Literacy Development
- Cognition and General Knowledge
- Approaches to Learning
- Physical Development and Health
- Social and Emotional Development

- To individualize experiences, instructional strategies, and services to best support each child
- In combination with other program data to determine progress towards meeting program goals
- To assess the fidelity of implementation of the curriculum
- To direct continuous improvement related to the effectiveness of curriculum, instruction, professional development, and program design or other program decisions based on the analysis of school readiness outcomes data

Reports Results:

- To inform parents and the community of the program’s progress in achieving school readiness goals
Data Analysis & EAS Selection

• CDE 4.1 – Teacher Qualifications
  – Staff file Review

Child Development & Education 4.1

<table>
<thead>
<tr>
<th>Teacher - Preschool - Staff File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summary of Preschool Teacher Qualifications:</td>
</tr>
<tr>
<td>No concerns in 4. Show Concerns Only</td>
</tr>
</tbody>
</table>

- **11/13/2014 3:25:24 PM - Sherry Fahmi**
  Teacher Qualifications:
  A baccalaureate degree and admission into the Teach For America program, passed a rigorous early childhood content exam such as Praxis II, taught preschool children in a Teach For America summer training institute.
  Notes:
  
- **11/13/2014 3:25:03 PM - Sherry Fahmi**
  Teacher Qualifications:
  A baccalaureate or advanced degree in Early Childhood Education (ECE)
  Notes:
  
- **11/13/2014 3:24:44 PM - Sherry Fahmi**
  Teacher Qualifications:
  An associate’s degree in ECE
  Notes:
  
- **11/13/2014 3:24:23 PM - Sherry Fahmi**
  Teacher Qualifications:
  A baccalaureate or advanced degree in Early Childhood Education (ECE)
  Notes:
Child Development & Education 4.1

**Teacher - Infant/Toddler - Staff File**

Summary of Infant/Toddler Teacher Qualifications:

2 of 3 have not obtained the required qualifications but are enrolled in a credential or degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.

1 of 3 Infant/Toddler teachers have not obtained the required qualifications and are not enrolled in a credential or degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.

<table>
<thead>
<tr>
<th>Test 7</th>
<th>- Hire Date: 11/13/2014 Full-time Employed Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/13/2014 3:47:37 PM - Sherry Fahmi</td>
<td></td>
</tr>
<tr>
<td><strong>Teacher Qualifications:</strong></td>
<td></td>
</tr>
<tr>
<td>Does not meet qualifications</td>
<td></td>
</tr>
<tr>
<td>Notes:</td>
<td></td>
</tr>
<tr>
<td>Is there a professional development plan on file? Yes</td>
<td></td>
</tr>
<tr>
<td>Notes:</td>
<td></td>
</tr>
<tr>
<td>Is the professional development plan designed to ensure attainment of qualifications and is the staff person currently enrolled in a degree program? Yes</td>
<td></td>
</tr>
<tr>
<td>Notes:</td>
<td></td>
</tr>
<tr>
<td>Date of expected acquisition of teacher qualifications: 12/19/2014</td>
<td></td>
</tr>
</tbody>
</table>

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- All preschool teachers currently have at least one of the following:
  - 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 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

All infant and toddler teachers currently have a minimum of an Infant/Toddler Child Development Associate (CDA) credential and training (or equivalent coursework) in Early Childhood Development that includes all of the following:

- Developing consistent, stable, and supportive relationships with very young children
- Knowledge of infant and toddler development
- Understanding of safety issues in infant and toddler care—e.g., reducing the risk of sudden infant death syndrome (SIDS)
- Knowledge of methods for communicating effectively with infants and toddlers, their parents, and other staff members
Child Development & Education 4.1

- Program staff exhibit the following: (select all that apply)
  - One or more preschool teachers have not obtained the required qualifications but are enrolled in a degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.
  - One or more infant/toddler teachers have not obtained the required qualifications but are enrolled in a credential or degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.
  - One or more preschool teachers have not obtained the required qualifications and are not enrolled in a degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.
  - One or more infant/toddler teachers have not obtained the required qualifications and are not enrolled in a credential or degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.

Child Development & Education 4.1

- Program staff exhibit the following: (select all that apply)
  - One or more preschool teachers have not obtained the required qualifications but are enrolled in a degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.
  - One or more infant/toddler teachers have not obtained the required qualifications but are enrolled in a credential or degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.
  - One or more preschool teachers have not obtained the required qualifications and are not enrolled in a degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.
  - One or more infant/toddler teachers have not obtained the required qualifications and are not enrolled in a credential or degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.
Child Development & Education 4.1

- Program staff exhibit the following: (select all that apply)
  - [ ] One or more preschool teachers have not obtained the required qualifications but are enrolled in a degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.
  - [ ] One or more infant/toddler teachers have not obtained the required qualifications but are enrolled in a credential or degree program and have a professional development plan that is designed to ensure attainment of the required qualifications.
  - [ ] One or more preschool teachers have not obtained the required qualifications and are not enrolled in a degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.
  - [ ] One or more infant/toddler teachers have not obtained the required qualifications and are not enrolled in a credential or degree program and do not have a professional development plan that will lead to the attainment of the required qualifications.
  - [ ] The program has a current waiver regarding preschool teacher qualifications pursuant to ACF-1M-HS-13-04.
Resources & Support

- HSKI-C Reviewer Field Guide
- HSKI-C Compliance Measure Guidance
- FAQ Document

- Q & A session set up for Monday 11/24 (TIME?)

Important Reminders

- Complete all onsite tasks and answer every TQ
- Contact your RFL if you have any questions or issues while onsite