



FY 2010 Office of Head Start Monitoring Protocol

September 10, 2009

Eligibility, Recruitment, Selection,
Enrollment and Attendance Protocol



Eligibility, Recruitment, Selection, Enrollment, and Attendance

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

Targeted Questions following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, or type of observation to be conducted. For example, when interviewing a parent, all Targeted Questions for parents, regardless of where they reside in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Eligibility, Recruitment, Selection, Enrollment, and Attendance section of the Protocol is divided into four subsections:

- Eligibility and Enrollment
- Attendance and Participation
- Program Options
- Management Systems Analysis



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1A

APPLIES ONLY TO: Programs serving preschool-age children

Has the program enrolled children who were not 3 years of age at the time of their enrollment or did not meet the eligibility requirements determined by the local school district?

Note: For all Head Start programs, if a vacancy opens during the program year, it may be filled by a 3-year-old who is otherwise eligible. Children in Migrant and Seasonal programs are eligible from birth to the child's entry into kindergarten.

Children may be enrolled at any time after their third birthday or before their 3rd birthday if they meet the eligibility requirements of the local school district.

1305.4(a)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1A

Document Review: Age/Income Eligibility Review Form

- Refer to the results summarized from the Age/Income Eligibility Review. The summary will include the number of files reviewed and the number and percentage of children the Head Start program serves who are not at least 3 years old by the date used to determine eligibility for public school in the community where the program is located or who were not 3 year old by their date of entry into the program.

1305.4(a)



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1B

Do program staff verify each child's eligibility and include in each file a statement signed by a program employee identifying the child's eligibility category and the documents examined to determine eligibility?

Note: Signed statements may list one of the following acceptable forms of proof of eligibility: Individual Income Tax Form 1040, W-2 forms, pay stubs, pay envelopes, employers' written statements, documentation showing current status as recipients of public assistance, and declarations of zero income. Also, note that homeless children and foster children are categorically eligible.

1305.4(c), 1305.4(d),
1305.4(e)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1B

Document Review: Age/Income Eligibility Review Form

- Refer to the results summarized from the Age/Income Eligibility Review. The summary will include the number and percentage of files reviewed that do not have signed statements identifying the child's eligibility category and documents examined to determine eligibility.



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1C

DOES NOT APPLY TO: American Indian or Alaska Native grantees

Has the program enrolled children who are not categorically eligible or who fall outside of the defined income eligibility requirements stated below?

A child is categorically eligible to participate in the Head Start program if the:

- Child's family income is below the poverty line,
- Child's family is receiving public assistance,
- Child's family is homeless, or
- Child is a foster child.

Additional income eligibility requirements include the following:

- Ten percent of children enrolled in the program may be over income.
- An additional 35 percent of children who are not categorically eligible may be from families whose income is between 100 percent and 130 percent of poverty.

645(a)(1)(B)(iii)(II)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1C

Document Review: Age/Income Eligibility Review Form

- Refer to the results summarized from the Age/Income Eligibility Review. The summary will include information on the number and percentage of children the program has determined to be in the categories of "income or categorically eligible" and "income or categorically ineligible." If fewer than 55 percent of the children enrolled are income or categorically eligible, the program might be out of compliance. In addition, if more than 10 percent of the children are income or categorically ineligible, the program might be out of compliance.
Applies to: Non-American Indian or Alaskan Native grantees



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1D

DOES NOT APPLY TO: American Indian or Alaska Native grantees

If the agency serves children whose family income falls between 100 percent and 130 percent of poverty, has it established and implemented outreach and enrollment policies and procedures to first ensure it is meeting the needs of children who meet one of the following criteria?

- The child's family income is below the poverty line.
- The child's family is receiving public assistance.
- The child's family is homeless.
- The child is a foster child.

645(a)(1)(B)(iii)(II)(aa),
645(a)(1)(B)(iii)(II)(bb)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1D

Interview: ERSEA Coordinator (Enrollment and Recruitment)

➤ Describe the steps you take to ensure the program is meeting the needs of children below the poverty line, children between 100 percent and 130 percent of poverty, children eligible for public assistance, foster children, or homeless children before enrolling other children.

Applies to: Non-American Indian or Alaskan Native grantees

➤ How do you enroll waitlisted children?

Applies to: Non-American Indian or Alaskan Native grantees

Document Review: ERSEA Policies and Procedures

➤ Review available documentation of outreach and enrollment policies and procedures to determine whether outreach is occurring before enrolling children between 100 percent and 130 percent of poverty.

Applies to: Non-American Indian or Alaskan Native grantees



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1E

APPLIES ONLY TO: American Indian or Alaska Native grantees enrolling more than 10 percent of over-income children

Do American Indian or Alaska Native grantees that enroll more than 10 percent of over-income children meet the requirements in 1305.4(b)(3)(i), 1305.4(b)(3)(ii) and 1305.4(b)(3)(iv)?

Note: Although American Indian and Alaska Native grantees may enroll up to 49 percent over-income children, they must meet certain conditions, including:

- *Serving all income-eligible children living on the reservation,*
- *Serving all income-eligible children native to the reservation but living in non-reservation areas, or*
- *Enrolling all non-American Indian income-eligible children whose families wish to enroll if the non-reservation area is not served by another Head Start (HS) program.*

1305.4(b)(3)(i),
1305.4(b)(3)(ii),
1305.4(b)(3)(iv)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1E

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- Can you walk me through the process you follow for enrolling over-income Native children?
1305.4(b)(3)(ii)
Applies to: American Indian or Alaskan Native grantees

Document Review: Age/Income Eligibility Review Form

- Review documents to confirm that the total enrollment of income-eligible children is at least 51 percent if the tribe meets the conditions in 1305.4(b)(3)(i) and 1305.4(b)(3)(ii)?
1305.4(b)(3)(iv)
Applies to: American Indian or Alaskan Native grantees



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1F	
Does actual program enrollment include at least 10 percent children with disabilities?	
<p><i>Note: Children who are receiving intervention services before an eligibility determination are considered eligible under 640(d)(2) of the Head Start Act.</i></p> <p><i>When examining grantee enrollment, review the grantee’s actual enrollment at the time of the review. If a problem is identified at this time, review the grantee’s cumulative actual enrollment to determine whether the grantee has identified and enrolled children with disabilities who subsequently dropped out of the program.</i></p> <p><i>This requirement does not apply to programs with a waiver approved by the Administration for Children and Families (ACF) for this requirement.</i></p>	640(d)(1)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1F

Interview: ERSEA Coordinator (Enrollment and Recruitment)

- What percentage of the actual enrollment in the program are children with disabilities or children who are receiving intervention services before an eligibility determination?

Document Review: Enrollment Reports

- Does the actual enrollment figure include 10 percent children with disabilities? In your notes, include the programs total enrollment and the number of children enrolled who have a disability or who are receiving intervention services. If the actual enrollment figure reflects fewer than 10 percent, does the grantee have a waiver?



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1G Does the program have documentation to support monthly enrollment data submitted to the Office of Head Start?	
	641A(h)(2)(A), 641A(h)(2)(B)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 1G

Document Review: Enrollment Reports

- Review enrollment reports. Are the monthly enrollment data consistent with what has been submitted to the Regional Office? Do the reports demonstrate that the grantee has maintained funded enrollment? Describe how actual enrollment data align with the data submitted in monthly enrollment reports.



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 2A

APPLIES ONLY TO: Center-based programs

When monthly average daily attendance in center-based programs falls below 85 percent, are the causes of absenteeism analyzed?

1305.8(a)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 2A

Interview: ERSEA Coordinator (Attendance)

- How do you document absenteeism? What do you do with the information? How is it used to resolve absenteeism problems (if they exist)?

Document Review: Attendance Records

- Review daily attendance records to determine whether causes of absenteeism are documented.



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 2B

Has the program ensured that no child's enrollment or participation in the Head Start program is contingent on payment of a fee?

*Note: Requiring parents to provide diapers should be cited under 1304.53(b)(1) on Compliance Question SAF1B.
State subsidies should not be used as a contingency for enrollment or attendance in the Head Start portion of the program.*

1305.9

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 2B

Interview: Parent (Fees)

- Have you ever been required to pay Head Start in exchange for your child's participation in the program? For example, are you required to pay late fees, registration fees, or provide money for your child to attend field trips? If yes, describe the payment you have been asked to make.
Asked by: ISR I

Document Review: ERSEA Policies and Procedures

- Based on information collected during a Parent Interview, parents are required to pay fees. Verify that these fees are required with the fiscal reviewer. Work with the Fiscal Reviewer to collect documentation of the required payments and include them as part of your evidence.



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 3A	
Does the program operate one or more of the approved program options in accordance with applicable regulations?	
	1306.33(a)(1), 1306.33(a)(2), 1306.36, 1306.31(a), 1306.34(a)(2), 1306.32(b)(3), 1306.32(b)(2), 1306.35(a)(1)

Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 3A

Interview: ERSEA Coordinator (Program Planning)

- Describe how the program determined the types of program options to offer and what information guided these decisions?
- Describe how information from the annual self assessment is incorporated into your program planning and implementation.
- Describe how information from the community assessment (and its updates) is incorporated into your program planning and implementation.

Presite Review: Service Plans and Program Plans

- If the program operates a combination option, does it provide an acceptable combination of minimum number of class sessions and home visits over a period of 8 months to 12 months?
1306.34(a)(2)
- If the program operates a home-based option, does it provide 1 home visit per week per family (a minimum of 32 home visits per year), lasting a minimum of 1½ hours each, as well as provide 2 group socialization activities per month for each child (a minimum of 16 group socialization activities per year)?
1306.33(a)(1), 1306.33(a)(2)
Applies to: Home-based programs
- If the program operates a home-based option for Early Head Start, does it provide the required minimum weekly home visits and monthly group socializations for the number of weeks of operation as approved in the grant?
1306.33(a)(1), 1306.33(a)(2)
Applies to: Home-based program serving infants and toddlers
- If the program operates a center-based program, does it ensure that it provides the required number of hours or days of operation?
(Note to reviewer: If not, describe information you used to come to this conclusion.)
1306.32(b)(3)
Applies to: Center-based program
- If the program operates an alternate program variation, can it demonstrate ACF approval?
1306.35
- If the program operates a family child care option, does it operate a sufficient number of hours to meet the child care needs of the families?
1306.35(a)(1)
Applies to: Family child care programs



Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 4A

This section lists a series of targeted questions not linked to a performance standard at the service area level. These questions are designed to contribute to a comprehensive analysis of the program's management systems. Accordingly, these questions appear in each protocol section and are completed for each service area to provide insight into how key management systems function with relationship to each service area.

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Targeted Question for Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) 4A

Interview: ERSEA Coordinator (Ongoing Monitoring and Oversight)

- How do you monitor the program's Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) practices and the program's compliance with all Federal regulations?
- Show me the documents, systems, and reports used in implementing the ongoing monitoring of eligibility, recruitment, selection, enrollment, and attendance practices.
- What do you do if you detect problems or weaknesses with the program's eligibility, recruitment, selection, enrollment, and attendance practices?

Summary Analysis: Reporting

- Summarize whether the program maintains and implements efficient and effective reporting systems. Indicate how well the program is generating reports related to ERSEA for Federal, State, and local authorities, as required by applicable law. Indicate whether the ERSEA reporting system helps to:
 - Control program quality,
 - Maintain program accountability, and
 - Advise governing bodies, policy groups, and staff of program progress.Your summary might reflect a potential program strength, a concern, or general compliance.

Summary Analysis: Overall Service Summary

- Summarize your general impressions of the program's management of ERSEA. The summary should describe what the program does well, which areas need improvement, and your overall level of confidence in the program's provision of ERSEA. Your summary should not directly reiterate the strengths and findings you identified through implementation of the protocol but, rather, should reflect your overall analysis and impressions of the program's effectiveness in ERSEA.



Summary Analysis: Ongoing Monitoring

- Summarize the program's process for ongoing monitoring of ERSEA practices. A comprehensive explanation of this system should include a description of each of the following:
 - Monitoring measures, tools or instruments, materials and procedures
 - Staff responsibilities for ongoing monitoring of their respective service areas
 - How the program analyzes and documents progress toward achieving program goals and complying with performance requirements
 - How follow up occurs for findings or problems identified through data collection, and how these findings are corrected and documented.

This summary should help all team members understand the effectiveness or ineffectiveness of ERSEA practices. Your summary might reflect a potential program strength, a concern, or general compliance.

Summary Analysis: Planning

- Review the ERSEA Services area's written plans so you understand the goals the program intends to achieve and the strategies the program plans to use to accomplish its goals. Summarize the program's progress in implementing its plans and achieving its defined goals. Your summary might reflect a potential program strength, a concern, or general compliance.

Summary Analysis: Record-Keeping

- Summarize whether the program is effective in keeping up to date and accurate ERSEA records. Your summary should provide examples of why you consider the program's record-keeping system to be effective or ineffective. Your summary might reflect a potential program strength, a concern, or general compliance.

Summary Analysis: Service Specific Strengths

- Summarize program strengths noted in ERSEA services. Describe any practices that were found to be new or innovative and had a positive impact that helped the grantee overcome challenges and provided greater/improved service quality or surpassed established performance indicators. Some examples of broad categories of program strengths include (but are not limited to):
 - Collaborations with local/community-based services
 - Exemplary fiscal practices to ensure the safeguarding of Federal dollars
 - Highly successful efforts to address and improve school readiness
 - Expansion of the program and increased accessibility
 - Extraordinary accommodations for children/families (e.g., children with disabilities)
 - Innovative program design and management

Do not include strengths that will contradict any PANCs identified on this review.