Purpose



Focus Area Two (FA2) provides an opportunity for individual grant recipients to demonstrate their effectiveness in implementing a high-quality program for children and families served over the course of their grant cycle, including the:

- quality of education services;
- intentionality of family and community engagement;
- monitoring of fiscal operations;
- effectiveness of health and safety practices;
- · focus on eligibility, recruitment, selection, enrollment, and attendance; and
- oversight of program structures.

The FA2 will determine if grant recipients are meeting the requirements of the Head Start Program Performance Standards (HSPPS), the Uniform Guidance, and the Head Start Act. Through the FA2, performance is evaluated in two ways:

- Determining whether a grant recipient is compliant with the Head Start Act, the Head Start Program Performance Standards (HSPPS), and the Uniform Guidance
- Understanding strong practices that the grant recipient may be implementing to further promote quality services for children and families

This information collectively supports the Office of Head Start's (OHS) understanding of the effectiveness of each grant recipient's performance, as well as the performance of grant recipients nationally, regionally, and within communities. The FY25 FA2 review reflects relevant language updates to the HSPPS that were made by the final rule, *Supporting the Head Start Workforce and Consistent Quality Programming*, published on August 21, 2024. This resource highlights updated requirements that will be monitored through the FY25 FA2 review. See the Federal Laws and Regulations section on page 3 of this protocol for more information.



Methodology

Grant recipients will have multiple opportunities to showcase program strengths through the activities that make up the FA2 Monitoring Review. These activities include (1) a planning call with the grant recipient's director; (2) an introductory meeting with program leadership; (3) data testing and checks to review fiscal transactions and eligibility files; (4) discussions with education and family services staff members, families and parents, the governing body, and the policy council; (5) data tours with directors and managers; (6) explorations in centers, classrooms, and socializations; and (7) touchpoints with the director on each day of the review.



Exhibit 1: FA2 Review Activities





FA2 Review Activity Overview

The FA2 is a five consecutive day review event that will take place on-site (some activities may occur virtually as needed). All review events will be led by a Review Lead and team of on-site reviewers.

Planning Call

- Notification of the FA2 will be given to the grant recipient through the 45-day Letter through Head Start Enterprise System (HSES) Correspondence. Grant recipients can access resources through HeadStart.gov and the Aligned Monitoring System 2.0 Virtual Expo to learn more about the FA2 review.
- The assigned Review Lead will reach out to the grant recipient director following the letter notification. The Review Lead will schedule a **planning call** with the director and any designees. This call will include general answers to questions the director may have, any requests for program data prior to the review, and confirmation of the five-day review schedule.

Introductory Meeting

• The **introductory Management Team Kickoff Meeting** will occur in-person on the morning of the first day of the review. The meeting will introduce the Review Team and the grant recipient's Management Team members. Management Team members will be invited to share initial context and insights about their respective content areas.

Data Testing

- Data testing takes place through the ERSEA Eligibility File Review and Fiscal Data Testing activities. Data testing is conducted on-site throughout the review week.
- The ERSEA Eligibility File Review checks for accuracy in collecting and reporting eligibility data, while Fiscal
 Data Testing reviews a sample of the grant recipient's fiscal transactions for fiscal integrity and strong
 record keeping practices. Throughout data testing activities, grant recipients should demonstrate internal
 controls that prevent, correct, and mitigate risk for fraud, waste, and abuse.

Discussions

• **Discussions** focus on gathering perspectives and experiences from families, education and family services staff members, the governing body, and the policy council. They take place on-site throughout the review week; virtual options will be provided to support any participants who cannot join in-person.

Data Tours

- **Data Tours** are conducted on-site throughout the review week with program managers for each content area. Through the data tours, program managers provide the Review Team with a real-time walk-through of data and reports to help reviewers understand how the grant recipient's services operate on a daily basis.
- The Human Resources Data Tour also includes a review of staff qualifications and criminal record check results.

Explorations

- Classroom Explorations are in-person observations of a subset of the grant recipient's Head Start classrooms. These observations focus on classroom management, individualized instruction, learning environments, and attention to safety.
- **Center Explorations** are in-person visits to a sample of the grant recipient's centers. These visits focus on the safety and maintenance of facilities where children are served.
- Socialization Explorations are an observation of a group socialization in home-based programs. These
 observations enable staff members to demonstrate how group socializations support parent engagement
 and skill development.





Touchpoints

- Touchpoints are held daily between the grant recipient director(s) and the Review Lead. These conversations provide an opportunity to check in about the status of the review activities and discuss any coordination or scheduling challenges that may arise. Touchpoints also provide an opportunity for the director(s) to ask questions or to provide any additional information to the Review Lead, as needed.
- The FA2 review ends with the touchpoint on the last day of the review.

Post-Review

Following the FA2 Review, grant recipients will receive a final report that will share information on the grant recipient's performance.



Road Map to the FA2 Protocol

This protocol and the accompanying *FA2 Monitoring at a Glance* resource documents are designed to guide grant recipients to prepare for the FA2 monitoring event. The protocol includes the topic areas for discussion, specific performance areas for assessment, and the Federal laws and regulations associated with each area of performance. This protocol also describes the monitoring approaches used during the FA2 review.

The protocol is divided into the following six sections:

- Program Design, Management, and Improvement (PDMI)
- Education and Child Development Services (ECD)
- Health Services (HEA)
- Family and Community Engagement Services (FCE)
- Fiscal Infrastructure (FIS)
- Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA)

Each content area in the FY25 FA2 Protocol includes the following information:

Monitoring Approach

The protocol outlines the specific review activities (detailed in the Methodology section above) that are included in each content area, as well as data and documentation that grant recipients will be asked to provide. Grant recipients can navigate to individual sections of the FA2 Monitoring Protocol to learn more about the activities included in the review of each content area.

Federal Laws and Regulations

Each section of the protocol includes a list of Federal laws and regulations grounding the review activities. Each grant recipient should note that it remains accountable for all HSPPS as well as other Federal, state, and local laws and regulations for program operations, management, and oversight.

On August 21, 2024, the Administration for Children and Families (ACF) published a final rule, *Supporting the Head Start Workforce and Consistent Quality Programming*, which included a number of updates to the HSPPS. Grant recipients must be in compliance with some of the updated requirements in the final rule as of October 21, 2024; other requirements have later compliance dates. A detailed list of the compliance timelines is available here.

To support grant recipients in adjusting to and implementing the updated requirements, OHS has only made a limited number of changes to the language of the FY25 FA2 review based on the final rule. Federal laws





and regulations included in the FA2 review that have been updated through the final rule will be marked with an asterisk in the table included in each content area.

Performance Areas and Performance Measures

The content of each section is organized into a set of Performance Areas. Performance Areas identify specific areas of performance associated with HSPPS. Each Performance Area is made up of Performance Measures that provide a more focused topic for the review event.

Collectively, the Performance Areas, Performance Measures, and review activities will support the OHS in understanding the strategies, practices, and systems programs have implemented, and how grant recipients are providing quality services to children and families and progressing toward program goals.





Program Design, Management, and Improvement

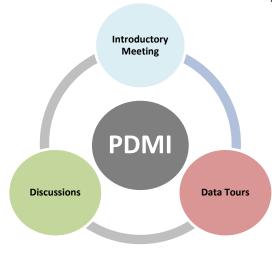
Overview

The grant recipient must use data to deliver high-quality services, continuously monitor program services, make improvements as needed, and achieve program goals and desired outcomes.

The Review Team will monitor three areas in **Program Design, Management, and Improvement (PDMI)**: (1) program design and strategic planning; (2) program governance; and (3) staffing and staff member supports.

Monitoring Approach

Exhibit 2: PDMI Review Activities



PDMI will be monitored through:

- Introductory Meeting with managers will start the review event and allow the reviewers to get to know the team and the grant recipient's program options
- Discussions with education staff members, family services staff members, the governing body, and the policy council will allow reviewers to understand supervision and oversight
- A series of Data Tours to review how managers track and use data relating to human resources, program design, and ongoing monitoring and oversight across content areas

During the PDMI Data Tours, the grant recipient will be asked to share real-time data and documentation in areas including but not limited to:

- Community assessment
- Program retention data
- Data for ongoing monitoring and continuous improvement
- Organizational chart
- Self-assessment
- Data or reports used to understand trends
- Standards of conduct
- Wage study

Federal Laws and Regulations in PDMI

- ✓ 642(c)(1)(B, E)
- ✓ 642(c)(2)(B)(ii)
- ✓ 642(d)(2)
- ✓ 653(a)

- √ 1301.5
- √ 1302.11(b)(5)*
- ✓ 1302.20(a)(1)
- ✓ 1302.90(c)*

- ✓ 1302.91(a)
- ✓ 1302.93(b)
- ✓ 1302.101(a)*
- ✓ 1302.102(b-c)

Requirements in the table above that have been updated through the final rule are marked with (*).





Performance Area 1: Program Design and Strategic Planning

This area will focus on how the grant recipient uses data to inform program design, planning, and improvement. Community assessment, self-assessment, and ongoing program data collection and monitoring should routinely guide data-driven decisions to best meet the needs of the program's children, families, staff members, and the broader community served.

Performance Measure 1.1: The grant recipient adjusts its program design to remain responsive to shifts in community needs, strengths, and resources over time. 1302.11(b)(5)* and 1302.20(a)(1)

Elements of this measure include but are not limited to how the grant recipient:

- Conducts a community assessment to understand shifts in community needs, strengths, and available resources
- Aligns program design and services based on community needs

*Note: This requirement has been updated through the final rule; however, in FY25 OHS will not issue findings based on the new language of this regulation.

Performance Measure 1.2: The grant recipient maintains and uses program data to routinely monitor performance, progress toward goals, and drive continuous improvement. 1302.102(b)(2)(i–ii) and 1302.102(c)(1–2)

Elements of this measure include but are not limited to how the grant recipient:

- Collects and analyzes data to identify trends, gaps, and areas to improve program services across content areas
- Engages in an annual self-assessment process that includes key program stakeholders to understand progress toward program goals

Performance Area 2: Program Governance

This area will capture how the governing body and policy council use their expertise and experience to provide data-informed oversight to ensure the program provides quality services for children and families and progresses toward program goals.

Performance Measure 2.1: The grant recipient collaborates effectively across program staff members, the governing body, and the policy council to facilitate effective program governance. 1301.5

Elements of this measure include but are not limited to how the grant recipient:

- Supports the governing body and policy council to provide effective engagement and oversight
- Offers ongoing training to members of the governing body and policy council to support knowledge and understanding necessary to carry out required duties

Performance Measure 2.2: The grant recipient's governing body is engaged and effective in providing legal and fiscal oversight. 642(c)(1)(B); 642(c)(1)(E)(i–iii); and 642(d)(2)(A–I)

Elements of this measure include but are not limited to how the grant recipient:

 Maintains a governing body that provides effective oversight and supports the grant recipient with its expertise





- Provides the governing body with data that are necessary to effectively conduct its responsibilities
- Leverages the governing body's community relationships that align with community needs

Performance Measure 2.3: The grant recipient's policy council is effective in providing program direction. 642(c)(2)(B)(ii) and 642(d)(2)(A-I)

Elements of this measure include but are not limited to how the grant recipient:

- Ensures the policy council consists of parents of children enrolled and members of the community
- Provides the policy council with data that are necessary to effectively conduct their responsibilities
- Supports parents to participate in the policy council
- Leverages the policy council's community relationships that align with community needs

Performance Area 3: Staffing and Staff Member Supports

This area will focus on the grant recipient's established systems to provide effective oversight of all staff members, maintain effective staffing structures through focus on staff retention and recruitment, and offering intentional professional development.

Performance Measure 3.1: The grant recipient's leadership and management team has clearly defined, manageable roles and responsibilities and the appropriate experience to effectively execute Head Start program operations. 1302.91(a); 1302.101(a)(1); and 1302.101(a)(3)

Elements of this measure include but are not limited to how the grant recipient:

- Offers effective management and oversight of each program area
- Allocates sufficient staffing to service areas to promote continuity of care
- Maintains qualified and competent staff members in leadership and management positions
- Engages in succession planning

Performance Measure 3.2: The grant recipient supports staff members' continuous improvement and professional development. 1302.101(a)(2)*

Elements of this measure include but are not limited to how the grant recipient:

 Provides regular and ongoing supervision for individual development and delivery of quality services across content areas

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Measure 3.3: The grant recipient establishes high expectations for staff members and implements ongoing communication and training systems to reinforce organizational accountability. 1302.90(c)*

Elements of this measure include but are not limited to how the grant recipient:

 Promotes collaboration among staff members and service providers to coordinate and individualize services for children





• Trains staff members on established policies and procedures that promote a culture of safety, including standards of conduct

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Measure 3.4: The grant recipient develops systems that support the Head Start workforce by providing fair compensation, opportunities for career advancement, and a positive work environment for staff members. 653(a) and 1302.93(b)

- Completed a wage study to provide staff members fair and comparable wages and compensation
- Supports staff members' wellness through opportunities for staff members to learn about mental health, health, and health education
- Engages in staff member retention activities including opportunities for staff members' professional growth
- Focuses on long-term human resources planning through ongoing talent acquisition and recruitment strategies
- Offers frequent opportunities for staff members to engage in team activities that foster safe and fun work environments
- Tracks retention data to identify and plan for any risks





Education and Child Development Services

Overview

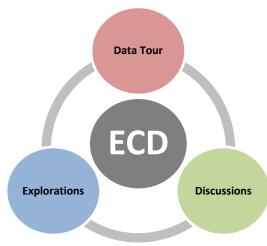
The grant recipient's services should lay a strong foundation for children's lifelong learning through highquality early education and child development services that promote the cognitive, social, and emotional growth of children, including those with disabilities. The grant recipient should use data to assess progress toward meeting the program's school readiness goals, to understand, track, and address children's individual needs, and to inform continuous improvement related to curriculum selection, instruction, and professional development.

The Review Team will monitor four areas in Education and Child Development Services (ECD): (1) curricula, screening, and assessment tools; (2) teaching strategies and learning environments; (3) qualifications, professional development, and coaching; and (4) transitions.

The Review Team will also explore approaches to supervising and supporting staff members to help them provide quality services; monitoring and adjusting staffing to ensure staff members have the capacity to do their work; and using data to track services, monitor for quality, and assess progress and outcomes. These activities will contribute to the Review Team's assessment of the grant recipient's program oversight, ongoing monitoring, and continuous improvement capacity and efforts.

Monitoring Approach

Exhibit 3: ECD Review Activities



ECD will be monitored through:

- Data Tours with education and human resource management staff members to better understand how staff oversight and ongoing monitoring ensure high-quality education services
- **Discussions** with education staff members to understand training, support, and practices
- Classroom Explorations and Socialization **Explorations** to observe how center-based and home-based practices are implemented and developmentally appropriate

During the review, the grant recipient will be asked to share real-time data and documentation in areas including but not limited to how the program uses:

- Child assessment data
- Instruction individualization for children
- Developmental screenings
 Education staff member tracking
- Referrals and follow-up services
- qualifications
- Coaching implementation data





Federal Laws and Regulations in ECD

✓ 1302.31(b-d)
 ✓ 1302.35(d-e)
 ✓ 1302.92(b-c)*
 ✓ 1302.61(a)

✓ 1302.33(a-b) ✓ 1302.91(e)

Requirements in the table above that have been updated through the final rule are marked with (*).

Performance Area 1: Curricula, Screening, and Assessment Tools

This area will focus on how the grant recipient implements its curriculum, screening, and assessment tools and uses data to support the ongoing needs and progress of children.

Performance Measure 1.1: The grant recipient implements research-based and culturally appropriate curricula to achieve child outcomes. 1302.32(a)(2) and 1302.35(d)(1)(i)

Elements of this measure include but are not limited to how the grant recipient:

- Utilizes a research-based curriculum appropriate for all provided program options, and trains staff members to support their effective implementation of the curricula
- Promotes the parent/caregiver role as the child's first teacher

Performance Measure 1.2: The grant recipient implements the appropriate screening tools to refer children for evaluation as indicated. 1302.33(a)(1) and 1302.33(a)(3)

Elements of this measure include but are not limited to how the grant recipient:

- Performs research-based developmental screenings for all children within the prescribed timeframes
- Uses tracking systems to ensure that any developmental concerns identified through the screening are promptly addressed through referral or follow-up

Performance Measure 1.3: The grant recipient implements appropriate ongoing child assessment tools to support children's progress and to individualize for every child. 1302.33(b)(2)

Elements of this measure include but are not limited to how the grant recipient:

- Conducts ongoing assessments of children's progress and development
- Individualizes lesson plans and teaching strategies using child assessment data

Performance Area 2: Teaching Strategies and Learning Environments

This area will focus on how the grant recipient provides high-quality instruction, teaching practices, and classroom environments that address the individual needs of children, as well as on the grant recipient's approach to home-based services to promote the caregiver role.

Performance Measure 2.1: The grant recipient provides responsive, effective care and teaching practices that are tailored to meet the needs of all children. 1302.31(b)(1)(i); 1302.31(b)(2); and 1302.61(a)

Elements of this measure include but are not limited to how the grant recipient:

 Supports staff members to use teaching practices that are responsive, language-rich, promote critical thinking, and motivate continued effort





- Supports children's social-emotional and behavioral development through effective classroom management skills
- Individualizes classroom practices to meet the needs of enrolled children, including dual language learners and children with disabilities
- Uses data to improve teaching and home-visiting strategies

Performance Measure 2.2: The grant recipient uses intentionally designed lesson plans to deliver developmentally appropriate experiences for children. 1302.31(b)(1)(iv)

Elements of this measure include but are not limited to how the grant recipient:

- Creates planned learning that is developmentally appropriate for children and aligned with the progressions outlined in the Head Start Early Learning Outcomes Framework
- Evaluates the success of learning experiences and activities in achieving desired outcomes for children

Performance Measure 2.3: The grant recipient provides well-organized learning environments and schedules that promote healthy development for children. 1302.31(c) and 1302.31(d)

Elements of this measure include but are not limited to how the grant recipient:

- Provides developmentally appropriate schedules that allow for various experiences throughout the day
- Implements classroom environments to meet the needs of enrolled children
- Uses data to improve the quality of learning environments

Performance Measure 2.4: The grant recipient uses home visits and group socializations to promote parent engagement and extend children's learning (if applicable). 1302.35(e)(1); 1302.35(e)(2)(i); 1302.35(e)(2)(ii); and 1302.35(e)(3)

Elements of this measure include but are not limited to how the grant recipient:

- Offers parents and families the opportunity to help plan group socializations
- Offers developmentally appropriate group socialization activities that align with the curriculum
- Provides families with opportunities for meaningful shared experiences during group socializations

Performance Area 3: Qualifications, Professional Development, and Coaching

This area will focus on the grant recipient's established system to maintain qualified, competent staff members, and provide professional development opportunities that promote high-quality teaching practices.

Performance Measure 3.1: The grant recipient has qualified education staff members. 1302.91(e)(1) and 1302.91(e)(2)(ii)

- Ensures all center-based Head Start Preschool lead teachers have the appropriate qualifications
- Ensures all center-based Early Head Start teachers have the appropriate qualifications





 Maintains any needed waivers or professional development plans related to staff members' qualifications

Performance Measure 3.2: The grant recipient offers education staff members a system of professional development to support delivery of quality education and child development services. 1302.92(b)(6)*

Elements of this measure include but are not limited to how the grant recipient:

- Implements a comprehensive approach to professional development
- Follows up with education staff members after professional development sessions to support them to apply their learning

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Measure 3.3: The grant recipient implements a research-based coaching strategy to support education staff members in using effective teaching practices. 1302.92(c)(2)

Elements of this measure include but are not limited to how the grant recipient:

- Implements a research-based coaching strategy for staff members who would benefit the most from intensive coaching
- Uses data to make adjustments to coaching opportunities and priorities

Performance Area 4: Transitions

This area will focus on how the grant recipient supports Head Start Preschool and Early Head Start children to transition out of the program.

Performance Measure 4.1: The grant recipient implements intentional transition strategies for Head Start Preschool and Early Head Start children.

- Collaborates with receiving schools to support smooth transitions for children and families
- Incorporates strategies to support successful transitions to new learning environments





Health Services

Overview

The grant recipient must provide comprehensive, high-quality health, oral health, mental health, nutrition and, if applicable, expectant family services that are supportive of each child's growth, development, and school readiness. The grant recipient must have an approach for implementing and monitoring health and safety practices to support the health, development, safety, and desired outcomes for children and families.

The Review Team will monitor five areas in Health Services (HEA): (1) child health and oral health status and care; (2) mental health and social and emotional well-being; (3) child nutrition; (4) safe and sanitary environments; and, if applicable, (5) expectant families.

The Review Team will also explore approaches to supervising and supporting staff members to help them provide quality services; monitoring and adjusting staffing to ensure staff members have the capacity to do their work; and using data to track services, monitor for quality, and assess progress and outcomes. These activities will contribute to the Review Team's assessment of the grant recipient's program oversight, ongoing monitoring, and continuous improvement capacity and efforts.

Monitoring Approach

Exhibit 4: HEA Review Activities



HEA will be monitored through:

- A series of Data Tours to review how managers track data and routinely monitor services relating to child heath, oral health, nutrition, mental health and social and emotional well-being, and safe and sanitary environments
- Discussions with families and education staff members to understand training, support, and health practices
- Both Classroom and Center Explorations to observe the safety of the program's environments and practices for selected classrooms and facilities

During the review, the grant recipient will be asked to share real-time data and documentation in areas including but not limited to:

- Criminal record checks
- ➤ Health training plans
- Oral and medical health determinations tracking
- Referrals and follow-up services \triangleright Emergency plans and security
 - measures
- Policies and procedures related to child behavior guidance

- Vision and hearing screening tracking
- ➤ Maintenance plans and records ➤ Example meal plan or menu





Additionally, grant recipients that serve expectant families will be asked to share additional data and documentation including but not limited to:

- Expectant families' access to health care and insurance
- Tracking system for newborn visits
- Example expectant families' family partnership agreement
- > Expectant families' referrals and follow-up

Federal Laws and Regulations in HEA

\checkmark	1302.17(a-b)*	\checkmark	1302.42(b)*	\checkmark	1302.45(a)(3)*
\checkmark	1302.21(d)	\checkmark	1302.42(d)	\checkmark	1302.46(b)*
\checkmark	1302.31(e)	✓	1302.43	\checkmark	1302.47(b)*
\checkmark	1302.40(b)*	\checkmark	1302.44(a)	\checkmark	1302.90(b)

Additionally, grant recipients that serve expectant families will also be monitored on the following Federal regulations:

✓ 1302.80(a-d)* ✓ 1302.81(a)* ✓ 1302.82*

Requirements in the tables above that have been updated through the final rule are marked with (*).

Performance Area 1: Child Health and Oral Health Status and Care

This area will focus on the grant recipient's established systems to assist children and families to connect to necessary medical health and oral health care including referrals, resources, and overcoming barriers. The grant recipient also uses the expertise of the Health and Mental Health Services Advisory Committee to address program and community needs.

Performance Measure 1.1: The grant recipient supports children in becoming and remaining up-to-date on a schedule of age-appropriate medical and oral health care, including needs for referrals and follow-up care. 1302.42(b)(1)(i)*; 1302.42(b)(1)(ii); and 1302.42(d)(2)

Elements of this measure include but are not limited to how the grant recipient:

- Confirms that a health care professional has made determinations of medical and oral health care for all children within 90 days of enrollment
- Supports children and families to become up-to-date on preventative medical and oral health care
- Tracks referrals and follow-up services for children who have an identified health need

Performance Measure 1.2: The grant recipient performs or obtains vision and hearing screenings for all children. 1302.42(b)(2)

Elements of this measure include but are not limited to how the grant recipient:

 Performs or obtains vision and hearing screenings for all children within 45 days of enrollment





^{*}Note: This requirement has been updated through the final rule; however, in FY25 OHS will not issue findings based on the new language of this regulation.

Performance Measure 1.3: The grant recipient provides health education opportunities to parents, assists them with understanding their child's health needs, and supports parents in navigating health systems. 1302.46(b)(2)*

Elements of this measure include but are not limited to how the grant recipient:

- Assists families to navigate health and mental health systems
- Removes barriers to improve access to health care for children and families

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Measure 1.4: The grant recipient leverages the Health and Mental Health Services Advisory Committee to address prevalent community health needs. 1302.40(b)*

Elements of this measure include but are not limited to how the grant recipient:

- Maintains representation of the program, community, and health professionals in the Health and Mental Health Services Advisory Committee
- Leverages the expertise of the Health and Mental Health Services Advisory Committee in addressing program health services

*Note: This requirement has been updated through the final rule; however, in FY25 OHS will not issue findings based on the new language of this regulation.

Performance Area 2: Mental Health and Social and Emotional Well-Being

This area will focus on how the grant recipient provides mental health services to children, families, and staff members to address needs, connect to services, and promote continued social and emotional development.

Performance Measure 2.1: In partnership with a qualified mental health consultant, the grant recipient develops a positive program environment that promotes the mental health and social and emotional well-being of children. 1302.45(a)(3)*

Elements of this measure include but are not limited to how the grant recipient:

- Maintains an active arrangement with a mental health consultant who is a licensed mental health professional or who is supervised by a licensed mental health professional
- Annually evaluates how the mental health consultation services meet the needs of the program
- Uses the mental health consultant to build the capacity of adults to support the mental health and social and emotional needs of children
- Implements various methods and approaches to build skills and capacity of all staff members who regularly interact with children

*Note: This requirement has been updated through the final rule; however, in FY25 OHS will not issue findings based on the new language of this regulation.

Performance Measure 2.2: The grant recipient implements practices that prohibit the use of expulsion and severely limit suspension. 1302.17(a)* and 1302.17(b)*

Elements of this measure include but are not limited to how the grant recipient:

• Prohibits the use of unenrollment from the program in response to children's behaviors





- Prohibits and/or severely limits the use of suspension in response to children's behaviors
- Develops and implements developmentally appropriate behavior guidance and positive discipline policies and practices

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Measure 2.3: The grant recipient provides family support services for mental health and social and emotional well-being. 1302.46(b)(1)(iv)*

Elements of this measure include but are not limited to how the grant recipient:

- Collaborates with families to understand and respond to children's behaviors and development
- Supports family mental health and wellness

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Area 3: Child Nutrition

This area will focus on how the grant recipient designs and implements nutritional services that incorporate individual needs and developmentally appropriate nutritional practices.

Performance Measure 3.1: The grant recipient implements nutrition services that accommodate children's unique nutritional needs. 1302.31(e)(2); 1302.44(a)(1); and 1302.44(a)(2)(v)

Elements of this measure include but are not limited to how the grant recipient:

- Follows a process to accommodate the individual feeding requirements of children
- Ensures safe practices for bottle-fed infants
- Promotes conversations and learning during meals and snacks
- Develops strategies to address food insecurities

Performance Area 4: Safe and Sanitary Environments

This area will focus on how the grant recipient maintains safety in staffing, facilities, materials, and equipment through establishing and implementing effective monitoring, policies, and procedures.

Performance Measure 4.1: The grant recipient establishes appropriate administrative safety practices and policies. 1302.47(b)(4)

Elements of this measure include but are not limited to how the grant recipient:

- Establishes health and safety policies and procedures
- Provides training on health and safety expectations to staff members

Performance Measure 4.2: The grant recipient completes background checks prior to hire for all staff members. 1302.90(b)(1–5)

- Completes and examines all necessary background checks for staff members
- Ensures the safety of children during the background check process
- Establishes a process to update background checks every 5 years





Performance Measure 4.3: The grant recipient establishes safe environments through daily and ongoing oversight of facilities, equipment, and materials. 1302.21(d)(1); 1302.47(b)(1)(ii–iv, ix); and 1302.47(b)(2)(i–iv)

Elements of this measure include but are not limited to how the grant recipient:

- Establishes systems to identify potential safety risks
- Implements a system of ongoing preventative maintenance and corrects identified safety issues
- Follows a process to ensure that all reportable incidents affecting the health and safety of children are reported to the Regional Office in a timely manner
- Maintains safe indoor and outdoor equipment and materials
- Designs program spaces to ensure appropriate supervision of children
- Maintains current licensure that meets all state, local, and tribal regulations, as required
- Maintains safe facilities that are free from pests, mold, pollutants, and safety hazards
- Implements a plan to ensure that children are not exposed to lead in water or paint in any facilities*

*Note: This requirement has been updated through the final rule; however, in FY25 OHS will not issue findings based on the new language of this regulation.

Performance Measure 4.4: The grant recipient establishes and follows emergency preparedness plans. 1302.47(b)(8)

Elements of this measure include but are not limited to how the grant recipient:

- Establishes and ensures staff members are ready to implement emergency management and disaster preparedness plans
- Implements measures to protect children and facilities in emergency situations

Performance Measure 4.5: The grant recipient ensures staff members engage in appropriate hygiene practices. 1302.43; 1302.47(b)(6)(i); and 1302.47(b)(6)(ii)

Elements of this measure include but are not limited to how the grant recipient:

- Implements hygienic practices for children and staff members
- Includes toothbrushing in the classroom schedule at least once a day

Performance Measure 4.6: The grant recipient ensures staff members engage in appropriate safety practices. 1302.47(b)(5)(ii)*; 1302.47(b)(5)(iii)*; and 1302.47(b)(7)(vi)

Elements of this measure include but are not limited to how the grant recipient:

- Follows appropriate practices to keep children safe during all activities
- Posts necessary information related to child food allergies

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.





Performance Area 5: Expectant Families (if applicable)

This Performance Area will focus on how the grant recipient provides high-quality services to enrolled expectant families and supports the transition of the newborn.

Performance Measure 5.1: The grant recipient designs and provides comprehensive services to expectant families. 1302.80(a); 1302.80(b); 1302.80(c); 1302.81(a)*; 1302.82(a)*

Elements of this measure include but are not limited to how the grant recipient:

- Provides education and support across various topics relevant for expectant families, including pregnant women and their partners
- Ensures that expectant families have a continuous, accessible source of health care and health care coverage
- Engages in the family partnership process with expectant families
- Facilitates connections and referrals for expectant families to access comprehensive services that meet families' needs
- Employs or contracts with staff members that have specific expertise that meet the needs of expectant families and the community

Performance Measure 5.2: The grant recipient provides appropriate newborn and transition services following the birth of the infant. 1302.80(d)* and 1302.82(b)

- Schedules a newborn visit with each expectant family and baby within two weeks of the baby's birth
- Engages families in transition planning
- Integrates services for expectant families in other services offered by the program





^{*}Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

^{*}Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Family and Community Engagement Services

Overview

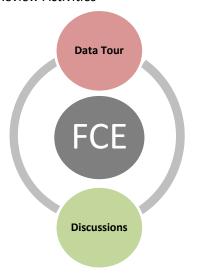
The grant recipient must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children's learning and development. Grant recipients are encouraged to develop innovative two-generation approaches that address prevalent needs of families and leverage community partnerships or other funding sources.

The Review Team will monitor four areas are measured in **Family and Community Engagement Services (FCE)**: (1) supporting family well-being and family engagement; (2) family partnerships; (3) promoting strong parent-child relationships and engagement in children's learning; and (4) community partnerships.

The Review Team will also explore approaches to supervising and supporting staff members to help them provide quality services; monitoring and adjusting staffing to ensure staff members have the capacity to do their work; and using data to track services, monitor for quality, and assess progress and outcomes. These activities will contribute to the Review Team's assessment of the grant recipient's program oversight, ongoing monitoring, and continuous improvement capacity and efforts.

Monitoring Approach

Exhibit 5: FCE Review Activities



FCE will be monitored through:

- Data Tours with family services and human resources managers to better understand how managers track and monitor for accurate and timely family engagement data, provide staff oversight, and monitor family and community engagement services
- Discussions with families, education staff members, and family services staff members to understand training, support, and practices implemented to support families

During the review, the grant recipient will be asked to share real-time data and documentation in areas including but not limited to:

- Family participation in volunteer opportunities
- Intake and assessment procedures
- Tracking system for family partnership goals
- Examples of family goals, strengths, or needs
- Economic mobility opportunities
- Tracking of father or male engagement
- Community partnership data
- Family services staff member qualifications





Federal Laws and Regulations in FCE

✓ 1302.34(b)(3,5)
 ✓ 1302.51(a-b)
 ✓ 1302.53(a)(1)
 ✓ 1302.50(b)(1-3,5)
 ✓ 1302.52(b-c)
 ✓ 1302.91(e)(7)

Note: None of the requirements in this content area have been updated through the final rule.

Performance Area 1: Supporting Family Well-Being and Family Engagement

This area will focus on how the grant recipient integrates the family into the program through communication and employment of qualified staff members to provide high-quality services to families.

Performance Measure 1.1: The grant recipient continuously engages all families in the program through open and effective communication. 1302.34(b)(3); 1302.50(b)(2); and 1302.50(b)(5)

Elements of this measure include but are not limited to how the grant recipient:

- Uses methods of two-way communication with families to create welcoming environments
- Communicates in languages spoken by families
- Offers families opportunities to participate in at least two parent-teacher conferences each program year
- Solicits and uses input from families to improve programming

Performance Measure 1.2: The grant recipient has qualified family services staff members who are supported to meet the specific needs of enrolled families. 1302.91(e)(7)

Elements of this measure include but are not limited to how the grant recipient:

- Ensures family services staff members have the appropriate qualifications
- Offers training and professional development for staff members to build effective, strength-based relationships with families

Performance Area 2: Family Partnerships

This area will focus on the grant recipient's established systems for completing, monitoring, and supporting family partnerships for enrolled families.

Performance Measure 2.1: The grant recipient implements a family partnership process that supports family-driven goals. 1302.50(b)(3); 1302.52(b); and 1302.52(c)(3)

- Implements intake and assessment procedures that identify family interests, strengths, and needs
- Collaborates with families to develop and progress toward family partnership goals
- Conducts ongoing review of the progress toward meeting family goals
- Offers families opportunities to support family goals or needs, including opportunities on economic mobility





Performance Area 3: Promoting Strong Parent-Child Relationships and Engagement in Children's Learning

This area will focus on the grant recipient's selection and implementation of a parenting curriculum. The grant recipient's approach should encourage family engagement in program offerings and support the parent as the child's primary educator.

Performance Measure 3.1: The grant recipient implements strategies, including a research-based parenting curriculum, that promote parenting skills and engage parents in children's development. 1302.34(b)(5); 1302.50(b)(1); 1302.51(a); and 1302.51(b)

Elements of this measure include but are not limited to how the grant recipient:

- Provides families opportunities to improve parenting knowledge and skills
- Engages fathers and other male caregivers
- Provides families opportunities to participate and contribute to the program
- Provides leadership opportunities for families
- Uses a parenting curriculum that meets the needs of families served, builds on parent knowledge, and offers opportunities for parents to practice their parenting skills

Performance Area 4: Community Partnerships

This area will focus on how community partnerships are established and used to support the ongoing needs of the program, families, and children who are served.

Performance Measure 4.1: The grant recipient has identified community partnerships that meet the needs and interests of families. 1302.53(a)(1)

- Builds community partnerships that facilitate access to resources that align with families' needs or family partnership goals
- Uses data-driven strategies to evaluate and obtain new community partnerships as family and community needs shift
- Participates in community partnerships that support increasing quality of local or state early care and education systems





Fiscal Infrastructure

Overview

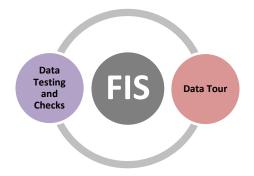
The Fiscal Infrastructure section of the review will focus on how the grant recipient shares information with the director, managers, governing body, and policy council; and how the grant recipient uses data to make sound fiscal decisions and ensure fiscal and legal accountability. The review event also monitors the integrity of fiscal operations, with a focus on mitigating the risk or occurrence of fraud, waste, and abuse.

The Review Team will monitor three areas in Fiscal Infrastructure (FIS): (1) budget development, implementation, and oversight; (2) comprehensive financial management structure and system; and (3) facilities and equipment management systems.

The Review Team will also explore approaches to supervising and supporting fiscal staff members to ensure integrity and consistency in fiscal operations. These activities will contribute to the Review Team's assessment of the grant recipient's program oversight, ongoing monitoring, and continuous improvement capacity and efforts.

Monitoring Approach

Exhibit 6: FIS Review Activities



FIS will be monitored through:

- Data testing and checks will examine the grant recipient's fiscal transactions
- **Data Tour** with fiscal staff members to understand how managers track and monitor for accurate and timely financial data and ensure effective fiscal oversight

During the FIS Data Tour, the grant recipient will be asked to share real-time data and documentation in areas including but not limited to:

- Budget to actual report
- Cost allocation plan
- Procurement procedures
- Indirect cost documentation
- > Financial management system
- ➤ Insurance documentation
- > Fiscal policies and procedures
- General ledger
- Equipment inventory
- Personnel record keeping system
- Recent transactions
- Reporting forms
- ➤ Non-Federal match
- Bank reconciliations
- Notices of Federal interest

Federal Laws and Regulations in FIS

- ✓ 75.302(a-b)
- ✓ 75.320(d-e)
- 75.414
- ✓ 1302.101(a)(4)
- 1303.46(b)*

- ✓ 75.303(a)
- ✓ 75.327(c)
- 75.416

- ✓ 75.303(c)
- ✓ 75.328(a)
- 75.430(i)
- √ 1303.4

- ✓ 75.305(b)(1)
- ✓ 75.403(a)
- 1302.91(c)
- √ 1303.5 √ 1303.12

Requirements in the table above that have been updated through the final rule are marked with (*).





Performance Area 1: Budget Development, Implementation, and Oversight

This area will focus on the process the grant recipient follows to develop a budget that is reflective of program goals, and how the budget is monitored and adjusted to be responsive to ongoing needs.

Performance Measure 1.1: The grant recipient engages in a transparent, data-informed, strategic process to develop and maintain a budget that aligns with program goals and circumstances. 75.302(b)(5)

Elements of this measure include but are not limited to how the grant recipient:

- Engages stakeholders in the budget development process
- Uses the financial management system to capture actual-to-budgeted costs monthly
- Regularly examines and addresses financial impact of emerging program needs and changes

Performance Area 2: Comprehensive Financial Management Structure and System

This area will focus on the grant recipient's establishment and implementation of financial policies and procedures to manage financial records and safeguard Federal funds in accordance with all governing regulations.

Performance Measure 2.1: The grant recipient implements a system for maintaining financial records and generating information needed to manage and safeguard Federal funds. 75.302(a); 75.302(b)(3); 75.430(i); and 1302.101(a)(4)

Elements of this measure include but are not limited to how the grant recipient:

- Maintains an automated accounting system for financial information and personnel costs
- Maintains complete and accurate financial records that identify Head Start funds and lineitem cost categories that align with the Head Start operating budget(s)
- Meets on-demand and routine reporting requirements on the requested dates

Performance Measure 2.2: The grant recipient maintains effective control over all funds, property, and assets to avoid theft, fraud, waste, and abuse. 75.303(a); 75.303(c); 75.305(b)(1); 75.327(c)(1); and 1302.91(c)

- Maintains and implements written fiscal policies and procedures
- Ensures fiscal staff members are qualified and supported to fulfill their responsibilities
- Minimizes the amount of time elapsing between drawing down Federal funds and disbursing funds for Head Start program costs
- Engages in an internal monitoring process to ensure fiscal compliance
- Implements an ongoing account reconciliation process and monitors financial statements for accuracy and checks for fraudulent activity
- Ensures safeguards to prevent loss, damage, or theft of program property or equipment
- Establishes a system for confidential and anonymous reporting of inappropriate financial management activities
- Promotes separation of financial responsibilities





Performance Measure 2.3: The grant recipient implements written procedures to ensure that only allowable costs are charged to the Head Start award in accordance with Federal statutes, regulations, and the terms and conditions of the Federal award. 75.328(a); 75.403(a); 75.414; 75.416; 1303.4; and 1303.5

Elements of this measure include but are not limited to how the grant recipient:

- Determines and documents costs for goods and services that are necessary and reasonable to the program's Head Start award
- Establishes and implements the cost allocation plan
- Establishes and implements a procurement process
- Tracks administrative costs and non-Federal match
- Separately identifies allowable direct and indirect costs

Performance Area 3: Facilities and Equipment Management Systems

This area will focus on how the grant recipient uses established systems to acquire and account for facilities and equipment that are purchased with Federal funds. This Performance Area will also address the grant recipient's process for identifying and mitigating risk through necessary insurance acquisition.

Performance Measure 3.1: The grant recipient implements a system for ensuring compliance with requirements for the acquisition, record-keeping, insurance, and disposal of facilities purchased, constructed, or renovated with Head Start funds. 1303.46(b)*

Elements of this measure include but are not limited to how the grant recipient:

- Files or posts the required notices of Federal interest for property and facilities
 - O The definition of the term "Federal interest" has been updated through the final rule, as follows: Federal interest is a property right which secures the right of the Federal awarding agency to recover the current fair market value of its percentage of participation in the cost of the facility subject to part 1303, subpart E, of this chapter funding in the event the facility is no longer used for Head Start purposes by the grant recipient or upon the disposition of the property. When a grant recipient uses Head Start funds to purchase, construct or make major renovation to a facility or make mortgage payments, it creates a Federal interest. The Federal interest includes any portion of the cost of purchase, construction, or renovation contributed by or for the entity, or a related donor organization, to satisfy a matching requirement.

Performance Measure 3.2: The grant recipient implements a system for ensuring that equipment purchased with Head Start funds is acquired, used, and disposed of in accordance with requirements. 75.320(d)(1); 75.320(d)(2); and 75.320(e)

Elements of this measure include but are not limited to how the grant recipient:

 Maintains required records for equipment purchased with Head Start funds including a physical inventory





Performance Measure 3.3: The grant recipient assesses and mitigates risk and maintains property loss, casualty, and liability insurance consistent with the replacement value of property and determined risk of liability. 1303.12

Elements of this measure include but are not limited to how the grant recipient:

• Identifies risks and obtains adequate insurance to address those risks





Eligibility, Recruitment, Selection, Enrollment, Attendance

Overview

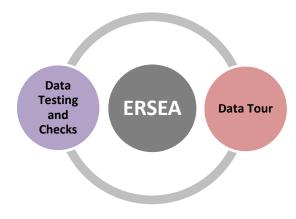
Grant recipients must ensure compliance with Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Federal regulation, including mitigation of enrollment fraud. The grant recipient will share information about ERSEA practices and how data are used to ensure the grant recipient recruits, selects, and enrolls children based on eligibility criteria.

Five areas are monitored in **ERSEA**: (1) recruitment; (2) selection; (3) eligibility; (4) enrollment; and (5) attendance.

The Review Team will also explore approaches to supervising and supporting staff members to help them provide quality services; monitoring and adjusting staffing to ensure staff members have the capacity to do their work; and using data to track services, monitor for quality, and assess progress and outcomes. These activities will contribute to the Review Team's assessment of the grant recipient's program oversight, ongoing monitoring, and continuous improvement capacity and efforts.

Monitoring Approach

Exhibit 7: ERSEA Review Activities



ERSEA will be monitored through:

- Data Testing and Checks through an ERSEA Eligibility File Review of sample client files to test for accuracy in collecting and reporting eligibility data
- Data Tour with ERSEA management staff members to better understand how managers track and monitor for accurate and timely ERSEA data and ensure practices that mitigate risk of fraudulent enrollment

During the review, the grant recipient will be asked to share real-time data and documentation in areas including but not limited to:

- Attendance records
- Enrollment vacancy tracking
- Selection criteria

- Eligibility tracking system
- ERSEA policies and procedures
- Waitlists

- Eligibility training records
- Sample child files (not applicable to Tribal programs)

Federal Laws and Regulations in ERSEA

✓ 1302.12(c-d)

✓ 1302.14(a)

✓ 1302.15(a)

✓ 1302.12(k-m)

✓ 1302.14(b)*

✓ 1302.16(a)(2)(i–iv)

√ 1302.13

✓ 1302.14(c)

Requirements in the table above that have been updated through the final rule are marked with (*).





Performance Area 1: Recruitment

This area will focus on how the grant recipient designs and implements recruitment strategies to reach children and families who may be eligible for program services, particularly focusing recruitment to the most vulnerable populations within the community.

Performance Measure 1.1: The grant recipient implements a recruitment strategy focusing on all families with eligible children, with specific outreach efforts to families with vulnerable children. 1302.13

Elements of this measure include but are not limited to how the grant recipient:

- Recruits children and families with the greatest need
- Strengthens recruitment and outreach efforts by evaluating strategies for effectiveness and customizing efforts based on current community needs

Performance Area 2: Selection

This area will focus on how the grant recipient designs and implements a selection process that is responsive to community needs and prioritizes children and families with the greatest need.

Performance Measure 2.1: The grant recipient establishes selection criteria and a waitlist based on community needs. 1302.14(a)(1) and 1302.14(c)

Elements of this measure include but are not limited to how the grant recipient:

- Develops selection criteria based on data from the community needs assessment
- Maintains a prioritized or ranked waitlist across all program options

Performance Area 3: Eligibility

This area will focus on the grant recipient's established systems to determine eligibility for children and families. This Performance Area will also cover how the grant recipient deters fraud and maintains eligibility requirements as outlined by Federal regulations.

Performance Measure 3.1: The grant recipient implements a clear, consistent, and compliant process for enrolling eligible families. 1302.12(c)(1); 1302.12(c)(2); 1302.12(d)(1); and 1302.12(k)

- Manages enrollment including the percentages of applicants who are eligible for Head
 Start services and who are over income for Head Start services including:
 - Maintains less than 10 percent of children enrolled who may benefit from services but do not meet other eligibility requirements; and
 - Maintains less than 35 percent of children enrolled whose incomes were between 100 percent and 130 percent of poverty
- Trains and monitors staff members on execution of eligibility interviews
- Ensures eligibility records are free from documentation errors
 - Note: This requirement will not be monitored in Tribal programs, in alignment with the updated language of 1302.12(e).
- Maintains an eligibility verification process to protect against fraudulent enrollment





Performance Measure 3.2: The grant recipient trains staff members to follow ERSEA regulations and establishes policies and procedures to ensure compliance with eligibility requirements. 1302.12(I) and 1302.12(m)(2)

Elements of this measure include but are not limited to how the grant recipient:

- Establishes written eligibility policies and procedures
- Provides eligibility training for eligibility staff members within 90 days of hire

Performance Area 4: Enrollment

This area will focus on the grant recipient's approaches to ensure full enrollment across program options, including the enrollment of children with disabilities.

Performance Measure 4.1: The grant recipient establishes practices to maintain full enrollment and accurately tracks current enrollment. 1302.15(a)

Elements of this measure include but are not limited to how the grant recipient:

• Identifies, tracks, and fills program vacancies within 30 days

Performance Measure 4.2: The grant recipient fills at least 10 percent of the program's total actual enrollment with children eligible for services under the Individuals with Disabilities Education Act (IDEA). 1302.14(b)(1)*

Elements of this measure include but are not limited to how the grant recipient:

- Maintains at least 10 percent of the program's actual enrollment with children eligible for services under the Individuals with Disabilities Education Act (IDEA)
- Collaborates with local early intervention and special education services to support enrollment

*Note: This requirement has been updated through the final rule and will be monitored through the FY25 FA2 review.

Performance Area 5: Attendance

This area will focus on the grant recipient's approach to encourage regular attendance in program services and how families are supported to overcome potential barriers to attendance.

Performance Measure 5.1: The grant recipient consistently employs strategies to encourage regular attendance. 1302.16(a)(2)(i–iv)

- Promotes regular attendance for each child
- Provides targeted supports for children and families at risk for low attendance



