Head Start Program Performance Standards
Reporting Requirements

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Ann Linehan: Welcome, I'm Ann Linehan and I'd like to thank you for tuning in today. Today we will be talking about reporting requirements outlined in 1302.102(d)123, and I'm delighted to have David here with me today as we talk through a few of the important requirements and areas of your consideration.

David Jones: Hi Ann, I'm happy to be here as well. During the Governess video we discussed the use of data with a cross reference to 1302 102C, which covers achieving program goals. The Governing Body And Policy Council needs information to carry out their work and to make informed decisions. This requirement is actualized by sharing reports with the management staff frequently enough for them to assess and evaluate areas that might need strengthening as well as highlighting where the program is actually meeting their targets. So, Ann, what is important for grantees to know about reporting?

Ann: What's important is how much it matters. [Laughter] Look folks, when I think about the rationale behind the reporting requirement, I envision a process that involves affective communication, sharing information with key staff, internal and external stakeholders, leadership and governance teams, in an efficient, usable, and timely manner. Keeping key management, staff, and stakeholders in the loop helps them fulfill their roles and responsibilities in support of reaching program goals. And it avoids that terrible response, I didn't have the information, I don't know the answer.

David: And I agree. No, grantees rely on reports to provide them with insight into their overall functioning, so developing policies and procedures to address key issues like ongoing monitoring and confidentiality really helps. Ongoing monitoring, self-assessment, and community assessment data enable grantees to make course corrections, ensuring that they are delivering the appropriate service to the right population through the best program option. Reports detailing how the various systems are functioning increases the likelihood that they can do this effectively.

Ann: David, in some of our internal conversations we thought it would be helpful to think about reporting in two separate buckets. One, or course, are the reporting requirements of the Head Start Act, and the other are the reporting requirements that some are new, some are a little bit different in the new Head Start Program Performance Standards. I think it's important to mention, as you've probably heard many times before, these regulations build upon decades of leadership in providing comprehensive, early childhood services. And these regulations further raise the bar on quality of Head Start programs. The regulations are clear, transparent, less burdensome, and illustrate just how far Head Start has come. For example in recent years, we have invested a lot of time and effort and resources to enhance grantee's capacity to better understand and utilize data in informed decision making. These new regulations guide us in a critical paradigm shift from compliance with prescribed plans to more flexibility and focus on measuring progress and being able to articulate outcomes. These standards are intentionally flexible, and they connect in a nice way to other standards placing emphasis on the process grantees should utilize to embrace flexibility. And we've learned, David, that programs that this is a challenge embracing the flexibility and having the discretion.

David: Absolutely.

Ann: And things not being so prescriptive. Emphases now is placed on developing reporting systems that can track progress over time in striving to attain individual child, family, and program goals. And it's important not to forget the monetary resources and processes grantees draw upon to achieve established and approved goals and outcomes.

David: Yeah, and many of our grantees have, over time, developed good reports and reporting

processes that keeps everyone informed and focused on their specific role in achieving program goals and outcomes. With respect to the Head Start Act, grantees are required to submit, of course, an annual report to the public and monthly reports that could include their actual enrollment, including attendance, reasons for under-enrollment, fiscal information, the financial audit, Department Of Agriculture Food And Nutrition Program, communication and guidance from the secretary, and the Program Information Report, affectionately known as the PIR. An improvement plan to the secretary based upon their annual self-assessment has to be approved by the governing body, and it's typically submitted to the regional office as part of their non-competing continuation application. It's also important to reiterate that grantees must share information in a manner that does not reveal personally identifiable information about an individual child or parent. Regulations that address the protections of PIIs can be found at 1303 sub part C in the new standards.

Ann: So, David, when I listen to the list of reports that are due monthly to the board, the one thing I think about, and again, these are the ones that came out of the Act, and I think we're even smarter today...

David: [Laughter] Yes.

Ann: But when you look at the list of reports and you think about a board member receiving those reports, it could be pretty overwhelming and pretty drowning in information. And I think the emphasis we're trying to also make is it the way in which you package the analysis that management staff does before? So they're handing the board that information in a way that is absolutely readily understood--

David: Absolutely.

Ann: So they can then make informed decisions.

David: Yeah, so specific chunks of data that they need to move the process forward.

Ann: So the new regulations under 1302.102(d) also require grantees to submit status reports at least twice a year to the governing body and policy council. These regulations are not prescriptive as to the content of the reports, however, status reports should look at grantee oversight data at a point in time to show how the grantee is progressing. Semi-annual reporting of progress supports mid-course corrections when data suggests the goals are not being met as expected or the children's progress has soared in one domain or laid in another. Semi-annual reports should fuel continuous improvement efforts and negate the element of surprise at the end of the year. They should also really provide great source documentation for the annual report to the public.

David: Absolutely. You know there are also report and requirements under 1304.12(dii) related to any significant incidents that could potentially adversely affect the program. So collectively between the two sections that we've just discussed, these reports would cover incidents affecting health and safety of program participants, circumstances affecting financial viability, program involvement in legal proceedings, any matters involving notification or a report to the state, tribal, or local authorities, child abuse and neglect, classroom and center closings, and legal proceedings affecting program operations. If they file for bankruptcy or agree to a reorganization plan as part of a bankruptcy settlement, if the agency has been debarred from receiving federal or state funds, and conditions including disqualification for CACFP, and license revocation, in the audit report with the determination that the agency is at risk for ceasing to be a going concern. These reports, as appropriate, need to be submitted to the responsible agency official, your regional office, immediately or as soon as practical. OHS takes self-reporting very seriously. This is a serious area of compliance, and failure to do so could have adverse consequences for the grantee.

Ann: Well you know I have to insert a little bit here.

David: [Laughter] Of course.

Ann: Clearly, I think there's always been an expectation that grantees had to inform us when these things occurred, particularly around health and safety. Now these are codified, so it's a requirement. And I think sometimes I understand grantees being a little bit reluctant and hedging their bets, and maybe I'm not gonna share this. But what we know is, we find out the information if not from the grantee, from another source. So it really behooves the grantee to be the one that does the timely reporting.

David: And you bring up a good point because with that then we could respond and sort of assist them with the necessary T and TA to correct whatever the issue is, so I think you're absolutely right. There are two other important areas that we wanna focus on, and that's the community needs assessment, really initiates the programs planning process. So it's the grantee's blueprint, if you will, outlining who will be engaged in the planning process, service delivery and design, and of course, goal establishment. What data will be collected, shared, and with whom. Who will design and evaluate or so ed monitor that data and at what intervals. When we start talking about deficiencies and quality improvement plans that's outlined in the Head Start Act, they're also essential because this helps grantees design appropriate course corrections addressing areas needing to be modified or strengthened. And then they also provide opportunities for grantees to deepen their understanding of ways to improve in a particular area of service delivery or program design.

Ann: And you know, David, we know that good information can quickly become outdated if it's not acted upon in an appropriate and timely manner. Sure it's important that reports are developed and shared with staff and other key stakeholders, but what's more important, at the end of the day, is what the report is telling us about our service delivery. Are the children safe, and if they're not, what contingency plans are grantees developing and putting in place to ensure change, that they change the conditions so that children will be safe? Data collection, analysis, interpretation, and usage inform grantee decision making and program planning. How are these well-chosen and well-implemented methods for data collection and analysis used to determine program impact? Is professional development a concern or an issue? Should grantees receive TA to strengthen their active supervision strategies? We must be able to assess risk, identify patterns affecting grantee performance, and deploy appropriate resources in a manner that addresses the issue and contributes to sustainability. So, in conclusion, we hope that this short video today will be a helpful reminder of how important reporting is. Reporting requirements, we know, enable grantees to create a well-rounded systemic approach to service design and delivery. They also help to build and maintain programs' institutional knowledge, and that's so important, particularly in time when we have turnover. They also strengthen the grantee's depth of knowledge about how effective their program design is in relationship to service delivery. They enable grantees to assess and evaluate progress towards achieving program goals and ensure stakeholders are provided relevant and timely information. For example, incidental or periodic reports. The governing body policy council and management staff need reports to fulfill their roles and responsibilities. Finally, stated earlier, reports are meaningful. They help improve communication and streamline data collection.

David: Thank you for joining us today.

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