Denver Great Kids Head Start

2017-2018
Policies and Procedure Manual

Approval Date: August 22, 2017
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Section 1: Philosophy

A. Developmentally Appropriate Practice
B. Safety of Children
C. Discipline
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Section 1.A. Developmentally Appropriate Practice

Effective Date: 1/1/00          Revision Date: 4/1/17          Approval Date: 05/23/17

POLICY:

Denver Great Kids Head Start is committed to programming that is developmentally and linguistically appropriate for the cognitive, social, emotional and physical needs of young children. This philosophy is based on the guidelines adopted by the National Association for the Education of Young Children, the Colorado Quality Standards and the Head Start Program Performance Standards. Developmentally appropriate practice defines the quality of interaction between adult and child as well as the characteristics of curriculum, materials, classroom organization and schedule, equipment, and the physical environment.

An important characteristic of developmentally appropriate practice is the use of divergent questioning, where the teacher acts as helpful adviser and uses open-ended questions to lead children to a deeper exploration of language and concepts while they play.

In addition, teachers and staff use positive guidance practices where the role of the adult is to guide the child to develop the personal strength and understanding necessary to make ethical, intelligent decisions. Rather than simply being a reaction to crisis, positive guidance involves developmentally appropriate, culturally responsive education, effective teaching practices and a well-organized classroom to reduce the occurrence of classroom problems. Positive guidance is an approach to children’s development in which conflicts are viewed as teaching and learning opportunities. Guidance teaches children the life skills they need as citizens of a democracy: respecting others and one’s self, working together in groups, solving problems using words, expressing strong emotions in acceptable ways, and making decisions ethically and intelligently.

All Denver Great Kids Head Start staff, including delegate and vendor agency staff, are expected to use positive child guidance when responding to mistaken behaviors. The interventions teachers make to address mistaken behaviors are firm, but friendly, instructive, and solution oriented, but not punitive. The teacher helps children learn from their mistakes rather than punishing them for the mistakes they make, empowers children to solve problems rather than punishing them for having problems they cannot solve; and helps children accept consequences, but consequences that teach and leave self-esteem intact rather than punish. Denver Great Kids Head Start delegate and vendor agency staff are required to comply with Head Start regulations that mandate use of positive methods of guidance that are educational in tone and responsive to the child’s level of development. A program must at the minimum implement the elements contained in 1302.31 through 1302.34 and a home-based program must implement at a minimum, the elements in 1302.33 and 1302.35.

1. DENVER GREAT KIDS HEAD START DELEGATE AGENCIES AND VENDORS SHALL ADOPT AND FOLLOW POLICIES AND PROCEDURES THAT:

   a) Ensure developmentally appropriate practice in the program in all interactions with children emphasizing nurturing and responsive interactions and environments that foster trust and
emotional security:

b) Educate parents in developmentally appropriate practice, its history and research foundation, the way it looks in a classroom, and its use by parents in family life;

c) Ensure staff follow developmentally appropriate practice by using the developmental progressions described in the Head Start Early Learning Outcomes Framework and curricula as described in 1302.32 and management tools such as policies and procedures, training, supervision, and evaluation;

d) Ensure no child is left alone or unsupervised.

e) Ensure that dual language learners are provided opportunities to focus on both English language acquisition and the continued development of the home language or if the child’s home language is not spoken by the teachers include supports to support the development by having culturally and linguistically appropriate materials and work to identify volunteers who speak the children’s home language who could be trained to work in the classroom and support the continued development of the home language.

f) Recognize the parent’s role as their child’s lifelong educator and encourage parents to engage in their child’s education

2. CENTER-BASED PROGRAMS WILL USE THE FOLLOWING DEVELOPMENTALLY APPROPRIATE PRACTICES:

a) The classroom is organized with developmentally appropriate schedules, lesson plans and is organized to be a caring community of learners.

b) Staff show respect for children and always treat them with dignity.

c) Children are given opportunities to interact with other children and adults in child-initiated activities as well as teacher-directed activities.

d) The environment is organized into various interest centers that include age-appropriate materials, supplies, and are connected to curriculum goals and the interest centers contain many opportunities for children to explore new and familiar things through individual and group activities.

e) Children follow a consistent daily routine that includes opportunity for individual, small group and large group activities.

f) Teachers follow curriculum goals for children based on observations of the children and on the assessment of each child’s development.

g) Curriculum goals for each child cover areas of pre-literacy, pre-math and early science, so that children explore key concepts and tools of intellectual inquiry through age-appropriate activities.

h) Staff and parents train each other on the child’s development and on developmentally appropriate practice. Staff and parents plan together for effective methods to meet the individual child’s needs.
3. **HOME-BASED PROGRAMS WILL USE THE FOLLOWING DEVELOPMENTALLY APPROPRIATE PRACTICES:**

   a) Ensure that a research-based early childhood home-based curriculum is used and aligns with the Head Start Early Learning Outcomes Framework.

   b) Staff show respect for children and always treat them with dignity.

   c) Parents are recognized as the primary educators of their children and are supported in that role.

   d) Home visitors and parents together set curriculum goals for the children based on observations of each child’s progress, on the assessment of children’s development or on other approved developmental checklists and portfolios, and on each child’s individual needs.

   e) Staff individualizes planned activities to meet the needs of specific children.

   f) Staff and parents share information with each other on the child’s development and on developmentally appropriate practice. They plan together to meet the individual child’s needs using the most effective methods.
**Section 1.B. Safety of Children**

Effective Date: 7/1/15  Revision Date: 7/1/15  Approval Date: 5/23/17

**STATEMENT OF PHILOSOPHY:**

Denver Great Kids Head Start is committed to creating caring communities of learners. In all program options, teachers and staff create and foster communities of learners that support all children’s capacity to develop and learn. Early learning environments are designed to protect the health and safety of learning community members, specifically in support of young children’s physiological needs for activity, sensory stimulation, fresh air, rest, and nourishment.

**POLICY:**

It is Denver Great Kids Head Start policy that all teachers, staff, and volunteers ensure children feel psychologically safe, and that the overall social emotional climate of the early learning environment is positive. All on-duty staff are to engage with children in a way that ensures the children’s safety.

Denver Great Kids Head Start and all delegate agencies must comply with Head Start regulations that require that staff supervise the outdoor and indoor environments so that children’s safety can be easily monitored and ensured (45 CFR 1302.47) and that agencies establish and implement employee standards of conduct under which include provisions and practices, so no child will be left alone or unsupervised.
Section 1.C. Discipline

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

STATEMENT OF PHILOSOPHY:

Discipline is an interaction with a child; it is not something that is done to a child. Positive discipline is an effective way of permanently eliminating undesirable behavior in children by encouraging them to take control over their own behavior, thus increasing self-esteem in children. The task of Head Start teachers is to provide children with the skills and tools needed to control their behavior effectively. In this way, children learn to regulate themselves. When children are having difficulty gaining self-discipline, the staff and parents work together to create a plan to meet the individual child’s needs. This is a process that takes love, patience, time, and effort.

POLICY:

It is Denver Great Kids Head Start’s policy that staff and volunteers use positive discipline methods that promote increased social competence and enhance children’s self-worth. The use of physical punishment, emotional punishment or total isolation of a Head Start child is prohibited.

EXAMPLES OF PRACTICES:

1. Use positive communication skills with children to develop positive social interactions, a healthy self-image and self-control appropriate to the child’s age.
   a) State directions positively; say what the child may do rather than what he or she cannot do.
   b) Use problem-solving techniques, cause and effect reasoning, and negotiating skills.
   c) Use “I” messages.

2. Use direct strategies with children that prevent, avert or decrease, negative behaviors:
   a) Teach children coping skills.
   b) Redirect or distract.
   c) Reinforce positive behavior.
   d) Rely on natural and logical consequences.

3. Use reflective time only when the child is acting out or is over-stimulated and needs to “cool down.” An adult sits with the child until he or she gains control of his or her behavior. Once the child calms down, it is important for the adult to “reflect” with the child on what happened, how the child may feel, and what could have happened to prevent the behavior. Again, this is a process and it will take time for some children to gain control over their behavior even with adult help. For children who have limited language skills, the adult may have to give the child the words to use. If some children are not able to discuss their behavior after they have calmed down, the teacher must still allow them to re-enter the play situation. However, the teacher must also within the same day follow-up with the child and discuss the issue in order to reflect on the behavior. It is important for children to engage in self-reflection in order to begin to understand the cause and
effect between behavior and consequences. It is this process that ultimately gives children an internal motivation for control.

4. When a staff member feels a particular child is not understanding the limits, the staff member should do the following:

   a) Involve the parent in helping to solve the problem. (Consider sources of stress or trauma at home or in the classroom.)

   b) Examine the classroom management for positive ways to affect the child’s behavior by changing the schedule, physical arrangement of class, groupings of children or by individualizing curriculum.

   c) Consult with a supervisor and/or delegate disabilities mental health lead.

   d) With the input of parent(s), refer the child for additional support services, which may include health, mental health, and/or special education.

5. Any child who does not respond to normal positive discipline approaches and limit setting may have other physical or emotional problems. The staff should seek ongoing support, consultation, and in-service training to handle children who are acting out in the classroom. Staff members should first consult with their immediate supervisor.

6. Additional ideas on positive discipline approaches are available:

   a) In the Creative Curriculum and other curricula guides.

   b) By consulting with the Education Coordinator.

   c) By consulting with disabilities/mental health staff.

7. The following practices are prohibited:

   a) Physical and/or emotional punishment – The use of physical force or emotional abuse may not be used as a disciplinary measure. Examples of prohibited physical force include spanking, slapping, pulling of hair and arms, or jerking a child. Examples of prohibited emotional abuse include verbally humiliating a child, threatening a child, yelling, shouting or taunting a child.

   b) Isolation – Confining a child to a small area and/or keeping the child away from classmates. Examples of prohibited practices include keeping the child inside when the other children go out to play or having the child eat in an area separated from the other children.

   c) Other practices - Examples of prohibited practices include denying food or rest as a form of punishment or punishing a child for toileting accidents.
Section 1.D. Staff Development

Effective Date: 1/1/00  Revision Date: 5/1/17  Approval Date: 5/23/17

POLICY:

Denver Great Kids Head Start will provide quality and on-going training for staff in all service areas. These trainings will be offered through classes, workshops, local and national conferences.

Denver Great Kids Head Start recognizes staff training and development as essential to maintaining a high-quality program.

Denver Great Kids Head Start will design staff development programs based on program improvement goals and will seek outside funding as needed to support these efforts in a systematic way.

Denver Great Kids Head Start delegate agencies will take part in grantee as well as agency level staff development. All Head Staff will complete 15 hours of staff development yearly as part of the performance standards requirement of 15 hours. (1302.93 (b)(1).

Delegate agencies will coordinate their staff development plans with Denver Great Kids Head Start.

Denver Great Kids Head Start staff development and training progress and results will be measured and reported to Denver Great Kids Head Start. Denver Great Kids Head Start will aggregate and analyze the results and that information will be included in program improvement planning.

Individual staff evaluations will be conducted on an ongoing basis and reviewed at least once a year at each agency and will include staff development goals and measures.
Section 1.E. Protection of Personal Identifiable Information (PII)

Effective Date: 1/1/00  Revision Date: 5/1/17  Approval Date: 5/23/17

POLICY:

It is Denver Great Kids Head Start’s policy that all information obtained about children, families, and employees is to be held in confidence and subject to the requirements stipulated in 45 C.F.R. 1303.21 and 1303.22. Employees of Denver Great Kids Head Start and Denver Great Kids Head Start delegate agencies and contractors may share the confidential information only on a “need to know” basis with other employees or professional consultants who are providing services to children, families or employees and only under the conditions referenced above.

Each delegate will develop specific policies and procedures to manage confidential information appropriate to their organizational structure that align to the established regulations stated above, or in the case of children covered by IDEA, must abide by confidentiality requirements for PII found in Part B or C of IDEA.

CONFIDENTIAL MATERIAL:

Material in a child’s file, whether or not a child is enrolled in a center. Confidential information, written or verbal, about a child, a child’s family, or an employee that is shared with the staff for the purpose of providing services to that child, family or employee. Employee personnel and human resources records.
Section 2: Program Design & Management

A. Program Governance
   A.1 Policy Council - Shared Governance
   A.2 City and County of Denver Ordinance
   A.3 Dispute Resolution Between Policy Council and Governing Body
   A.4 Policy Council Meetings
   A.5 Community Complaint Resolution
   A.6 Informed Governance
   Attachment A
   A.7 Conflict of Interest

B. Management, Planning and Continuous Improvement

C. Communication

D. Record Keeping/Reporting

E. Program Monitoring

F. Self-Assessment

G. Human Resources
   G.1 Human Resources and Office of Human Resources Hiring Guidelines
   G.2 City and County of Denver Code of Conduct
   G.3 Policy and Procedure for Violating Eligibility Determination Regulations
   G.4 Volunteers
   G.5 Staff Physicals
   G.6 Criminal Background Checks

H. Community Partnerships and QRIS

I. Training
Section 2. A.1. Policy Council and Governing Body: Shared Governance

Effective Date: 1/1/00  Revision Date: 5/1/17  Approval Date: 5/23/17

POLICY:

PROCEDURES FOR CITY AND POLICY COUNCIL, FOR SHARED DECISION-MAKING UNDER 45 C.F.R. 1301

PURPOSE:

Denver Great Kids Head Start is committed to the principles of shared governance, as expressed in the Head Start Performance Standards and other rules and regulations. As a City agency, Denver Great Kids Head Start must also follow the laws, rules and regulations that govern the City and County of Denver. In order to bring together these two sets of rules to assure proper and timely management of Denver Great Kids Head Start program, these procedures detail the way in which the Denver Great Kids Head Start Policy Council and the legal authorities of the City and County of Denver will interact to fulfill their obligations for shared governance, as detailed in the Denver specification of duties under Section 642 (c) of the Head Start Act of 2007. (See attached description).

ALLOCATION OF DUTIES:

Denver Great Kids Head Start and the City and County of Denver will follow the local specification of duties, to conform with Section 642 (c) of the Head Start Act of 2007. In order to show the detail on allocation of duties of the governing body, which is the City and County of Denver performing its duties under the City Charter and the Colorado Constitution, this chart shows the division of duties for Mayor, City Council, Manager of Finance, Auditor and the Office of Human Resources.

POLICY COUNCIL:

Regular meetings, at least six times a year, to set budgets, approve plans, and other mandated duties, plus additional study sessions as requested. Members shall represent various program options within delegate agency operation. At the beginning of each program year, the Policy Council will adopt a calendar of regular meetings for the year with selection of times, days, dates and locations by a majority vote of the members. By-laws from the previous Policy Council will be used to govern voting procedures. The Policy Council will be trained in those by-laws prior to the vote. Policy Council may amend the calendar and the by-laws as it deems necessary throughout the year. Policy Council members are comprised of two types; parent representatives must make up the majority of the council and; community representatives from key stakeholder constituency organizations and agencies. Policy Council members can serve up to five one-year terms.

MAYOR’S OFFICE:

A representative of the Mayor’s Office, selected by the Mayor, will attend Policy Council meetings, be available for communication to the Policy Council, at its choice, and to receive communication from the Policy Council. The Mayor’s representative will receive and review copies of all meeting notices and minutes and federal correspondence and serve as a member of the Head Start Governing Body. The Mayor serves as the Chairperson of the Head Start Governing Body.
CITY COUNCIL:

The Denver Great Kids Head Start Executive Director or designee will attend the Denver City Council Safety and Well-Being Committee meetings as requested to present grant applications, budget, and other action items requiring City Council approval. A calendar for presentations could be developed with the Chair of the Safety and Well-Being Committee to support City budget approval as required by the City Charter and to support all required federal grant applications, required federal audits, and other actions required of Head Start grantees. The chair of the Safety and Well-Being Committee has an open invitation to attend meetings of Policy Council to hear comments, concerns and other program information, in order to facilitate regular and open communication between Policy Council and Denver City Council. The chair of the Safety and Well-Being Committee will receive copies as requested of all meeting notices, minutes, agendas and federal correspondence concerning the operation and administration of Denver Head Start programs.

MANAGER OF FINANCE:

The Manager of Finance or his/her designee is a member of the Head Start Governing Body to ensure regular, prompt and thorough fiscal and accounting information and to be available for regular communication from Policy Council, as needed.

AUDITOR:

The Auditor or his/her designee is a member if the Head Start Governing Body to ensure that established internal policies and procedures are in place to safeguard funds.

OFFICE OF HUMAN RESOURCES:

Office of Human Resources (OHR) is the City’s personnel agency and the OHR or his/her designee is a member of the Head Start Governing Body. OHR will assist as requested in personnel matters relating to the Director and will follow all regular City procedures related to the hiring of other Denver Great Kids Head Start City staff. Office of Human Resources’; interview protocols allow the agency to form interview committees that include members of the Policy Council. These protocols allow each agency to refine job descriptions, scope of searches and other elements of staff recruitment that provide opportunities for participation by Policy Council members in accordance with the requirements of the Performance Standards.
PolICY:

Background: The City and County of Denver has established the office of Denver Great Kids Head Start and the composition of the Policy Council.

Please refer to the attached Ordinance No. 319 as amended.
Section 2.A.3. Dispute Resolution Between Policy Council and Governing Body (Impasse Procedures)

Effective Date: 1/1/00  Revision Date: 5/1/17  Approval Date: 5/23/17

POLICY:

Background. The City and County of Denver administers the Denver Great Kids Head Start program and the Head Start Policy Council participates in policy making or in other decision about the Head Start program. The composition of the Head Start Policy Council is defined in the Head Start Program Performance Standards, 45 C.F.R. 1301.3. The governing body consists of the five entities of city government, e.g., the Mayor, Manager of Finance, City Council, Auditor, and the Office of Human Resources. These governing entities and the Denver Great Kids Head Start Policy Council have the responsibility to adopt a procedure to resolve internal disputes. This policy statement contains such procedure and may at times be referred to as an impasse procedure as required at 45 C.F.R 1301.6.

DISPUTE RESOLUTION PROCESS:

1. Lists of mediators from professional mediation associations and the City Attorney’s office will be provided by the Policy Council and the governing entities.

2. If a disagreement occurs between any of the governing entities of the City and County of Denver and the Denver Great Kids Head Start Policy Council, the governing entity in question and the Head Start Policy Council chair will declare that a dispute is at an impasse.

3. Within ten (10) business days of the declaration of impasse, the following activities shall happen:
   a) The Chairperson of the Denver Great Kids Head Start Policy Council and a designee of the Denver Great Kids Head Start Policy Council, the Denver Great Kids Head Start Executive Director, and either the Mayor’s designated representative, the City Council’s designated representative, the Manager of Finance’s designated representative, the Auditor’s designated representative or the Director of the Office of Human Resources, as appropriate, shall participate in at least two (2) meetings during which the parties will attempt to identify solutions on a proposed action. A third meeting may be scheduled at the discretion of the parties involved with additional individuals invited to discuss the issue.
   b) The parties may upon mutual agreement invite presentation at any mediation from other content experts to present information relevant to the matter in dispute. The parties will report on the results of these meetings to the Policy Council. This step must be accomplished within ten (10) business days of the last mediation.
   c) The summary of the substance of the discussions on each matter in dispute and the report on the results of this negotiation will be presented to the Policy Council for approval or disapproval by the parties participating in the dispute resolution process.

4. Approval or disapproval of the previously proposed action or the new action identified by mediation will be by majority vote of a quorum of the Policy Council as defined in the Denver Great Kids Head Start Policy Council by-laws.
5. If the internal process outlined above does not successfully resolve the matter, the parties will submit to mediation by a trained mediator using the respective lists of mediators established by the parties.

   a) Selection of the mediator will occur in the following manner: The parties shall each submit the name of a mediator candidate from the lists provided by the Policy Council and the governing entity. The mediator needs to have experience with local government law, federal contract obligations, and diverse communities. The parties shall attempt to agree on a mediator from among their two named mediators. If the parties cannot agree on a selection, the parties will toss a coin to determine which party will designate the first person on the list to be invited to mediate. If that mediator is unavailable, then the parties will begin the process of mediator selection again. The mediator shall be retained by contract by the City and County of Denver through the Denver Head Start Office or by purchase order issued by the Purchasing Division of the Department of General Services.

   b) The parties shall submit to the Mediator for two meetings; mediation cannot exceed fifteen days (15) from Step 4 in the dispute resolution process.

   c) The parties and the mediator will report the results of the mediation on each issue in dispute to the full Policy Council.

   d) The Policy Council will approve or disapprove the previously proposed action, or the new action identified by mediation by majority vote of a quorum of Policy Council members as defined in the Policy Council by-laws.

6. If no mutual agreement has been reached after mediation, the Governing entity (Mayor) with legal and fiduciary responsibility shall resolve the matter.
Policy Council designates the days and times of Policy Council meetings. Meetings will occur on a monthly basis and more often if decided by the Policy Council.

The Chairperson and/or Secretary or designee notify each member of the Policy Council one week in advance of each meeting directly, or through the City Head Start Office staff.

In case of inclement weather or dangerous road conditions, Policy Council members will be notified by 3:30 p.m. on the day of the meeting. Closures will follow Denver Public Schools’ closure. Policy Council members may also call the Head Start Office direct line for recorded information (720) 913-0880.
Section 2.A.5. Community Complaint Resolution

Effective Date: 1/24/06          Revision Date: 7/1/14          Approval Date: 8/26/14

POLICY:

The purpose of this policy is to offer Head Start parents or members of the community the opportunity to register complaints with the Denver Great Kids Head Start program. Individuals can file complaints if they feel they, or their child, have not been treated fairly, courteously, respectfully, and/or may also file a complaint against any aspect of the program in which the parent or community member is dissatisfied.

All complaints must be submitted in a timely manner from the point of the incident or from the point of becoming aware of the incident.

The first attempt at resolution of the complaint should be made at the level closest to the source of the complaint. If the complaint is with a particular center, delegate agency or vendor agency, initial attempts should be made to resolve the complaint at that level.

Complaints are viewed as an opportunity to enhance programming to be more responsive to the needs of the community.

If the complaint is related to the provision of special education services under the Individuals with Disabilities Act of 2004 (IDEA), individuals should follow appropriate due process procedures as described in this law. These procedures are required to be explained at the time permission for formal evaluation is obtained and at subsequent Individual Education Plan meetings. The grantee Disabilities Director is available if parents and community members have questions about rights and entitlements.

PROCEDURES:

The individual has the right to have a support person assist him/her during any stage of these procedures. The support person may be any person the individual chooses. Every effort will be made to communicate with the individual in their dominant mode of communication throughout the process.

1. Individuals should first attempt to resolve the issue at the level closest to the source of the complaint. Every effort should be made to address concerns with the agency (vendor or delegate) from which the complaint originates.

2. If the complaint cannot be resolved with the agency, individuals may submit a grievance, in writing, to the Executive Director, Denver Great Kids Head Start.

3. A meeting will be scheduled to work on the resolution within 10 working days of receipt of the grievance letter.

4. Attending this meeting may be the Head Start Executive Director, the staff involved (if any), a staff member to take notes, and anyone else determined appropriate by the Head Start Executive Director.

If the parent feels that the complaint still has not been resolved, a letter should be submitted to the
Policy Council Chair describing the disagreement and suggestions for a favorable outcome.

1. The Policy Council will review the grievance at the next scheduled Policy Council meeting.
2. If not resolved at the full meeting, the Policy Council will select a committee of no less than three of its members to resolve the grievance (Grievance Committee is considered as ad-hoc committee according the Policy Council By-Laws).
3. The Grievance Committee can request a meeting with any parties involved.
4. The Grievance Committee will make written recommendations to the Policy Council.
5. The Policy Council can accept or deny the committee’s report and will develop a final recommendation for resolution to the Office of Children’s Affairs Director who will be responsible for following through with those recommendations.
6. At the next scheduled Policy Council Meeting, the Director of the Office of Children’s Affairs will issue a report and the case will be closed.
7. All grievances will be kept on file for a period of five years.

**COMPLAINT LETTER:**

The grievance letter must contain the following elements:

1. Description of the grievance (complaint) with specific names and dates
2. Actions taken to date
3. Recommendations for a satisfactory conclusion
4. Name and contact information (name and contact information will be kept confidential, if so stated)

Questions about the process can be directed to the Executive Director, Denver Great Kids Head Start.
Section 2.A.6. Informed Governance

Effective Date: 12/17/08       Revision Date: 5/1/17       Approval Date: 5/23/17

POLICY:

This policy statement contains standards of conduct for disclosing, addressing and resolving any conflict of interest, and any appearance of a conflict of interest, by members of the governing body, officers and employees of the Denver Head Start Office, members of the Denver Head Start Policy Council, and delegate agencies, contractors, vendors, consultants, or agents (including their officers, employees, and directors) who provide services or furnish goods to the Denver Head Start Office. This policy represents compliance with 42 U.S.C. 9837(c) (1) (C) and (c) (2) (C) and 45 C.F.R. §92.36 (b) (3).

Please refer to Appendix B for the Denver Great Kids Head Start Policy for Informed Governance.
Section 2.A.7. Conflict of Interest

Effective Date: 1/1/00      Revision Date: 7/1/14      Approval Date: 8/26/14

POLICY:

This policy statement contains standards of conduct for disclosing, addressing and resolving any conflict of interest, and any appearance of a conflict of interest, by members of the governing body, officers and employees of the Denver Head Start Office, members of the Denver Head Start Policy Council, and delegate agencies, contractors, vendors, consultants, or agents (including their officers, employees, and directors) who provide services or furnish goods to the Denver Head Start Office. This policy represents compliance with 42 U.S.C. 9837(c) (1) (C) and (c) (2) (C) as well as 45 C.F.R. §92.36 (b) (3).
**Section 2.B. Management, Planning and Continuous Improvement**

Effective Date: 1/1/00  Revision Date: 5/1/17  Approval Date: 5/23/17

**POLICY:**

Denver Great Kids Head Start implements systematic, ongoing management processes and program planning that includes consultation with the governing body (Mayor, Manager of Finance, City Council, Auditor, Office of Human Resources), Policy Council, and grantee and delegate agency staff in accordance with the Head Start Program Performance Standards 45 C.F.R. 1302.101, 1301.93, and 1302.103.

Every five years Denver Great Kids Head Start conducts a comprehensive community assessment identifying community needs, strengths and service gaps for families and children. In response to the community assessment, five-year goals and objectives are developed in partnership with the governing body, Policy Council and grantee and delegate agency staff. During the other four years of the five-year funding cycle, the community assessment is updated. Annually, content area work plans are updated with input from content area administrators and coordinators, Policy Council Program Committee and grantee staff. The Health Team approves the health work plan, and the Policy Council approves the remaining content area plans.

Denver Great Kids Head Start implements effective and efficient management process that are described below in the overall context of continuous improvement. The processes are comprehensive and include input and participation from various parts of the overall DGKHS structure including city staff, delegate and vendor agency staff, governing body members, policy council members, parents and other city offices as appropriate. The philosophy of continuous improvement and data driven planning guides and informs the managements systems at DGKHS. Integral to these process is the wealth of information that is compiled by DGKHS staff and the Director of Research and Analysis for the Office of Children’s Affairs, a position that is cost-shared with the Head Start and General Fund budgets.

Through the comprehensive planning process program goals are established and closely monitored during the annual Head Start contract process and grant submittal process to the Regional Office of Head Start. Progress is discussed in detail at meetings throughout the year including monthly content area meetings, cross-content area meetings, management team meetings, site monitoring, and Program Design and Management Team meetings. Progress is also gauged through the review and analysis of program data including the annual PIR in August/September, and the abbreviated PIR which is reviewed annually in December and March and child outcomes data received and analyzed three times per year.

A program planning timeline is developed annually in June.
Section 2.C. Communication

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start and its delegate agencies and vendors will support open and clear communication through their organizational structure, management systems and standard operating procedures. Written and spoken communications will be in plain language and in a language, that is understood by the families. Delegate agencies and vendors must adopt, follow and document policies and procedures that ensure effective communication is maintained between Denver Great Kids Head Start, the agency, agency staff, parents and the community. Communication strategies will include but are not limited to:

1. Regular meetings will be established and will include:

   a) Governing Body meetings are scheduled twice yearly, in March/April and in September/October. The spring meeting agenda includes the approval of the Head Start funding application and the fall meeting agenda includes a report of annual performance and program accomplishments.

   b) Bi-monthly management team meetings are established early in the grant year (July) and all parties are notified.

   c) Program Design and Management Team Meetings are scheduled one yearly in February.

   d) Monthly Policy Council meetings are scheduled and in addition to policy council members, delegate agency staff also attends.

   e) All meeting agendas require regular reports from the director and summary minutes are prepared and distributed to all parties within 10 days of the meeting.

2. Management systems will include but are not limited to:

   a) Grantee staff communication methods include but are not limited to:

      i. Standing staff meetings with a regular calendar of times and days, meeting agendas and notes.

   b) Regular individual supervision meetings with standing times and dates by the director with each grantee staff member.

3. A Management Team will be established, consisting of delegate agency Head Start Directors, and vendor agency representatives along with City Head Start staff and the Denver Great Kids Head Start Executive Director:

   a) Management Team will set and follow a calendar of regular meetings to address management issues and to advise Policy Council and the Denver Great Kids Head Start Executive Director on matters of policy and management.

   b) Working groups and committees of Management Team will follow these same requirements.
4. Files at Denver Great Kids Head Start Office will be set up for all policy and management meeting groups, clearly labeled and available for inspection in the office. The files will contain the calendars, agendas and materials passed out at each meeting.

5. The communication requirements of the “Communications” section of the Denver Great Kids Head Start Policy Manual apply to all management groups, both standing and ad hoc, that may be developed as the need arises and as the Denver Great Kids Head Start Executive Director approves. These groups may include but are not limited to family services coordinators, education coordinators, fiscal managers, mental health team members, nutrition, etc.

6. All types of communication with parents will be in plain language.

7. Denver Great Kids Head Start delegate agencies and vendors for nutrition, disabilities, health and mental health shall adopt and implement policies, procedures, staff training and monitoring systems to ensure that communication is provided to families with limited English proficiency (LEP) in order for these families to participate fully in Head Start’s comprehensive services. These policies must include:
   a) Free translation services as needed and desired by families;
   b) Confidentiality policies and documentation;
   c) Every effort to provide teachers, teacher assistants or family services staff who can communicate with children in their own language;
   d) A system to notify families of the availability of translation services;
   e) Training for staff to know when such services are needed and how to access those services;
   f) A system to provide translations of key documents, notices and minutes in the languages used by families using the Head Start services of the agency.
Denver Great Kids Head Start will be accountable for the results it achieves for children and families:

1. To the children themselves, that their time in the program prepares them for school and life success;
2. To families who entrusted their children to the program;
3. To public and private funders who invest in early childhood programs in order to document true improvements in the lives of young children and their families and to show the reasons for continuing investment;
4. And to the people of the City and County of Denver who agreed to undertake this work on the grounds that it is a cost-effective investment in the next generation of Denver citizens.

Denver Great Kids Head Start will gather and analyze various data types to measure program effectiveness in order to identify and use more effective program strategies and eliminate less effective program strategies. This is a continuous improvement process...

Therefore, Denver Great Kids Head Start requires a strong information management system that can generate program reports as needed for the U.S. Department of Health and Human Services and the City, for program management and planning; and to track outcomes for children over time.

Denver Great Kids Head Start delegate agencies and vendors must take part in these activities as they are set up:

1. Work with Denver Great Kids Head Start to ensure their own data collection systems gather and record information required by the Denver Great Kids Head Start and work with Denver Great Kids Head Start to analyze and interpret delegate agency-specific data.
2. Assign each child enrolled in Head Start an identification number from Denver Public Schools (known as Project ID) to track student progress and to relate that progress back to program variables, such as curriculum, program option, teacher training and qualifications, and other factors.
3. Handle all information with highest respect and care for its confidentiality, according to the policy on confidentiality in this Policy Manual.

Denver Great Kids Head Start also will follow strict confidentiality standards and report its findings in aggregate numbers only; never by an identifiable individual.
Section 2.E. Program Monitoring

Effective Date: 10/26/00     Revision Date: 5/1/17     Approval Date: 5/23/17

POLICY:

Denver Great Kids Head Start is committed to providing excellent services to children and families that result in school readiness both for the child and the family. Therefore, in compliance with 45 CFR 1302.102 b), with the consultation and participation of the policy groups and, as appropriate, other community members, Denver Great Kids Head Start will conduct annual, on-going monitoring of all aspects of program services at its Head Start delegate agencies including their planning for and conducting the various trainings required in the Head Start regulations, including but not limited to the following areas:

1. 45 CFR 1301.5: training for governing body and Policy Council on the HSPPS;
2. 45 CFR 1302.12 (m): training on eligibility;
3. 45 CFR 1302.31 (a), (b): training for staff on effective teaching practices and classroom volunteers;
4. 45 CFR 1302.32 (a): training on curricula implementation and fidelity;
5. 45 CFR 1302.35 (d): training for Home base staff;
6. 45 CFR 1302.47 (4): training on safety practices within centers and classrooms;
7. 45 CFR 1302.91 and 1302.92: training and professional development for staff;
8. 45 CFR 1303.72 and 1303.75: training for bus drivers as appropriate (DGKHS does not offer transportations services on a routine basis).

DGKHS monitoring efforts will assess compliance with these requirements along with Head Start Program Performance Standards, and child care licensing standards. This work will be conducted in the spirit of continuous quality and Risk Management improvement. This policy sets forth the system of program monitoring using both the delegate agency’s self-assessment and the Denver Great Kids Head Start delegate monitoring activities.

1. DELEGATE AGENCY’S SELF-ASSESSMENT:

   Head Start Program Performance Standards require delegate agencies to conduct an annual Self-Assessment. Denver Great Kids Head Start will review the results of each delegate’s Self-Assessment.

2. DELEGATES WILL PROVIDE THESE DOCUMENTS EACH JANUARY:

   a) Written procedures for program Self-Assessment;
   b) Minutes which reflect the involvement of the Policy Committee/Council throughout the entire process;
   c) The written results and a summary of the self-assessment;
d) Action plans;
e) Verification of corrections

3. **DENVER GREAT KIDS HEAD START DELEGATE AGENCIES MONITORING ACTIVITIES**
   Grantee staff will perform monitoring activities throughout the year. These activities will include but are not limited to:

   a) Site visits;
   b) Review of delegate agency training plans;
   c) Observations;
   d) Interviews;
   e) File audits;
   f) Review of records, reports, assessments, agreements, agendas, minutes, menus, curriculum, schedules, and logs;

   **Schedule of monitoring visits include:**

   1. **PROGRAM DESIGN AND MANAGEMENT (PDM)** meetings will occur annually and be facilitated by the Head Start Executive Director. The agenda for these meetings may include:

      a) Annual review and approval of grant application and related documents,
      b) Delegate agency child outcome data
      c) School Readiness Plan implementation
      d) Annual review of policies and procedures
      e) Ongoing DGKHS compliance monitoring – including site performance indicators
      f) Program deficiencies and non-compliance

   2. **FISCAL AND FINANCIAL MANAGEMENT** - Monitoring will occur monthly and throughout the year and will include:

      a) Desk Audit
      b) Fiscal Checklist
      c) Administrative Costs
      e) Annual review of policies and procedures
      f) Site visits
      g) Training budget
      h) Bi-monthly meeting with financial managers
3. **EDUCATION AND CHILD HEALTH DEVELOPMENT SERVICES** - All classrooms will be observed at least once during the program year and home visit observations will occur at least once a year:

   a) Two socialization activities will be observed
   b) Annual review and approval of education focus plan
   c) Annual review of school readiness plan implementation
   d) Annual review of policies and procedures
   e) Education Coordinators monthly meetings
   f) Random sampling of classroom -10 percent
   g) Certify pedestrian safety training within 30 days of enrollment by delegates – Education

4. **ELIGIBILITY, RECRUITMENT SELECTION, ATTENDANCE, ENROLLMENT (ERSEA):**

   a) Head Start children’s files will be monitored at least once a year to ensure ERSEA requirements are being followed:
   b) Files will be reviewed to verify how eligibility for the Head Start program was determined; including, age, income, and categorical eligibility.
   c) Recruitment plans will be requested and reviewed by grantee office.
   d) Universal Selection criteria shall be reviewed by the grantee on a yearly basis. When changes are necessary the revised criteria will also be reviewed and approved by the grantee Policy Council.
   e) Delegate agencies will submit delegate agency-specific criteria to grantee office annually in July after approval by their Policy Council/committee.

   Enrollment and attendance will be monitored on a monthly basis. Delegate agencies who fall below 85% attendance rate in any given month will be required to provide a written explanation on the absenteeism, including actions taken to improve attendance.

5. **FAMILY ENGAGEMENT** - Children’s files will be monitored at least once a year:

   a) Parent meetings will be monitored at least once a year for each delegate
   b) Community partnerships will be monitored at least once a year
   c) Annual review and approval of Family and Community Partnerships focus plan
   d) Annual review of policies and procedures
   e) End of Month Enrollment and Attendance Reports
   f) Review monthly parent committee minutes and policy council minutes if applicable
   g) Review Family Partnership Agreements for each delegate
   h) Family Services Coordinators monthly meetings

6. **DISABILITIES SERVICES** - Data tracking forms are reviewed monthly and Children’s files will be monitored at least once a year:
a) Classroom observations for disabilities will be made at least once a year or as requested
b) Review of disabilities enrollment and RFO process requirements and timelines
c) Annual review and approval of Disabilities focus plans
d) Annual review of policies and procedures
e) Disabilities and mental health regular meetings

7. **HEALTH, MENTAL HEALTH AND NUTRITIONAL SERVICES** - Children’s files will be monitored at least once a year (delegate nurses conduct monthly chart reviews) – 10% random sampling:

a) Nutrition will be observed through at least three site visits a year per delegate agency
b) Health Team meetings at least monthly
c) Annual review and approval of Health and Nutrition focus plan
d) Annual review of policies and procedures and as needed
e) Health Services Advisory Committee meets bi-monthly to provide monitoring oversight
f) Delegate Health Services Advisory Committees meet quarterly to provide monitoring oversight for delegate

8. **FACILITIES, EQUIPMENT AND MATERIALS AND EQUIPMENT, USED IN HEAD START FACILITIES:**

a) Monitoring by Grantee staff
b) Health and safety reviews conducted annually in September and follow-up as needed
c) Transportation Services (NA)

9. **MONITORING RESULTS:**

In compliance with the Improving Head Start for School Readiness Act of 2007, Section 641A (d) (1): Evaluation and Corrective Action for Delegate Agencies, the following procedures are established:

a) A final report for each monitoring activity is written by grantee staff and presented to the Denver Great Kids Head Start Executive Director for approval. The Head Start Executive Director will provide the delegate agency’s Head Start Director and Executive Director with the completed report in a timely manner. The monitoring report will be provided to the delegate agency governing body by the delegate agency Executive Director in a timely manner.

b) The City further reserves the right at all times to determine, in its sole discretion, that a delegate agency or a vendor is not in compliance with its contract, applicable federal, state or local laws, or any subsequent policy directive issued by the Head Start Executive Director, which noncompliance does not constitute a deficiency, as such term is defined by the federal government for Head Start purposes in the Head Start Act, 42 U.S.C. 9801.
In the event that any such non-compliance is identified as a result of Denver Great Kids Head Start’s monitoring efforts, a written report of the non-compliance will be provided to the delegate agency’s Executive Director and Head Start Director containing the findings of non-compliance.

The report will identify the specific area(s) of noncompliance, identify the areas of noncompliance to be corrected, and state the date upon which the Contractor is to correct the areas of noncompliance. If the Contractor is unable or unwilling to correct the specified areas of noncompliance within the time period designated by the City, then the City will issue a Notice of Findings of Deficiency which must be corrected, either immediately or pursuant to a Quality Improvement Plan in accordance with the procedures in contract.

Upon verification that appropriate and timely corrective action has been taken, a letter will be sent from the Denver Great Kids Head Start Executive Director to the delegate agency Executive Director and Head Start Director.

In the event that the Head Start grantee agency identifies a deficiency as defined in Section 637 of the Head Start Act in a delegate agency through monitoring evaluation, the grantee agency must help delegate agency develop corrective plans, including timetables for addressing identified problems. Upon determining that a deficiency exists in the area of health and safety, written notice will be provided to the delegate agency within five days of becoming aware that a deficiency exists. The written notice may provide up to ten working days to remedy the conditions and/or systems contributing to a determination that a deficiency exists. Moreover, the Head Start grantee agency shall take action, which may include—

a) Initiating procedures to terminate the designation of the agency unless the agency corrects the deficiency as programmed;

b) conducting monthly monitoring visits to such delegate agency until all deficiencies are corrected or the Head Start agency decides to defund such delegate agency; and

c) Releasing funds to such delegate agency—

i. only as reimbursements except that, upon receiving a request from the delegate agency accompanied by assurances satisfactory to the Head Start agency that the funds will be appropriately safeguarded, the Head Start agency shall provide to the delegate agency a working capital advance in an amount sufficient to cover the estimated expenses involved during an agreed upon disbursing cycle; and

ii. Only if there is continuity of services.

The City has the right at all times to determine, in its sole discretion, that Contractor has one or more deficiencies (“Deficiencies”), as such term is defined at Section 637 of the Head Start Act and as such section may be amended from time to time. If the Head Start Executive Director finds that the Contractor has Deficiencies, he or she will notify the Contractor in writing of such findings of Deficiencies (“Notice of Findings of Deficiencies”). The Notice of Findings will identify the Deficiencies to be corrected and will state that the Contractor is to correct the Deficiencies immediately or must instead develop a Quality Improvement Plan (the “Quality Improvement Plan”) to correct the Deficiencies.
10. **TERMINATION:**

Any termination of a delegate agency’s contract will be processed in accordance with the contract terms and/or applicable federal regulations concerning termination of a contract with a delegate agency

a) Denver Great Kids Head Start will notify the delegate agency of contract termination and the delegate agency has ten work days to appeal the termination of the contract to DGKHS after the notification has been received.

b) Denver Great Kids Head Start has twenty work days to respond to the delegate agency appeal.

c) If the grantee sustains its decision to terminate the delegate agency contract, the delegate agency may, to the extent permitted by federal regulations, appeal in writing to the responsible HHS official within ten work days after the receipt of the grantee’s final decision.
Section 2.F. Self-Assessment

Effective Date: 1/1/00       Revision Date: 5/1/17       Approval Date: 5/23/17

**POLICY:**

Denver Great Kids Head Start will use current year OHS monitoring instruments, including the fiscal checklist and the safe environments checklist, in support of the annual self-assessment, required under the Head Start Program Performance Standards at 45 C.F.R. 1302.102 (b) (2).

The Denver Great Kids Head Start Executive Director, in consultation with the Policy Council and staff will propose an annual process to review program performance. Policy Council will approve the process.

Denver Great Kids Head Start Policy Council members will be invited and encouraged to participate on focus area teams to conduct the self-assessment and will receive and approve the results.

The self-assessment will be concluded in time for the results to be incorporated into program improvement planning, along with other information which may include the Head Start Program Information Report, the community needs assessment, child outcomes data, and other program information. All program improvement plans will be incorporated into the next Head Start application.
Section 2.G. Human Resources

Effective Date: 1/1/00  Revision Date: 5/1/17  Approval Date: 5/23/17

EMPLOYEE HANDBOOK:

Denver Great Kids Head Start requires delegate agencies to have a clear and accessible statement of its personnel policies and practices. This statement must be distributed to employees and supervisors. Each agency and vendor must conduct training on these personnel policies and practices for employees and supervisors.

Denver Great Kids Head Start recommends that agencies develop employee and supervisor handbooks but do not require them do so.

STAFF QUALIFICATIONS:

Denver Great Kids Head Start will ensure that staff, substitute/temporary staff and consultants have the knowledge, skills, and experience they need to perform their assigned functions responsibly and will use the Head Start Performance Standards at 45 C.F.R. 1302.91 as the baseline requirements for all covered positions. Denver Great Kids Head Start delegate agencies will provide semi-annual reports on teacher and teacher assistant staff qualifications.

Denver Great Kids Head Start will also ensure that Performance Standards regarding human resources management are met.
Section 2.G.1. Human Resources and Office of Human Resources Hiring Guidelines

Effective Date: 01/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

Please see Rule 3 of the City and County Hiring Guidelines in the appendices.
Section 2.G.2. City and County of Denver Code of Conduct

Effective Date: 01/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

**POLICY:**

This policy statement sets forth the standards of conduct applicable to employees and Policy Council members of the Denver Great Kids Head Start Office concerning the award and administration of contracts for the administration of Head Start programs and the participation of grantee and delegate agency staff on Head Start Policy Councils or Head Start Policy Committees. Denver Great Kids Head Start affirms that the City’s role as fiduciary agent, responsible for the administration of Head Start funds, and that its position of trust in the care of children requires the highest standards of conduct on the part of its Commissioners, Policy Council members, and employees and the employees, officers and directors of its delegate agencies and vendors.

Denver Great Kids Head Start affirms, too, the preference that Head Start gives parents in opportunities for employment for which they are qualified and for participation in governance unless they are employees or contractors of Denver Great Kids Head Start.

1. This policy statement is further intended to comply with any and all requirements of the federal government to avoid “real or apparent conflicts of interest” in the award and administration of contracts as described generally at 42 U.S.C. 9837(c) (1) (C) and (c) (2) (C) as well as 45 C.F.R. §92.36 (b) (3).

Therefore, the Denver Great Kids Head Start Office will adopt, maintain and implement the mandates of the Denver Charter and the Denver Revised Municipal Code concerning the City’s Code of Ethics with respect to the award and administration of contracts involving the expenditure of Head Start funds. For convenience purposes, the applicable Charter and Code are set forth below. In the event of any conflict between the provisions set forth below and the official version of such provisions, the official and binding version shall be the certified version contained in the records of the Denver City Clerk.

Each and every professional services contractor of the City and County of Denver that operates a Head Start program or provides professional services to Head Start program, shall adopt, maintain, and implement written policies concerning ethical standards of conduct of employees, officers and directors with respect to the award and administration of contracts involving the expenditure of Head Start funds. Each such contractor shall deliver a copy of its written policy concerning the ethical standards of conduct to the Denver Great Kids Head Start Director by attaching such copy as an exhibit to the Head Start annual contract. Failure to submit such policy statements on a timely basis may result in the forfeiture of future financial awards of Head Start funds by the City.

The Denver Great Kids Head Start Office and its professional services contractors operating a Head Start program or providing professional services to Head Start programs shall further adopt, maintain and implement procedures to train and inform parents, employees, officers, directors and volunteers on the conflict of interest rules that apply to Denver Great Kids Head Start. Conflict of interest policies must be explained in all policy, staff and parent manuals and handbooks prepared by the City’s delegate agencies. Conflict of interest policies and laws shall be discussed with each employee at the beginning and end of employment. The Denver Great Kids Head Start Office and its professional service contractors shall maintain a record of such discussions.
Please see City & County of Denver Code of Conduct Hiring Guidelines in the appendices.
Section 2.G.3 Policy and Procedure for Violating Eligibility Determination Regulations

Effective Date: 7/01/15 Revision Date: 5/1/17 Approval Date: 5/23/17

In determining eligibility for Head Start services all delegate agencies of Denver Great Kids Head Start must follow Head Start regulations at 45 CFR 1302.12.

1. Delegate agencies must also develop and implement policies that address ramifications for violating eligibility determination regulations, policies and procedures. These procedures must be spelled out in Codes of Conducts or other similar delegate agency personnel policies and procedures. (Refer to 45 CFR 1302.12 (l).

2. Delegate agencies must establish policies and procedures that describe all actions taken against staff who intentionally violate Federal and program eligibility determination regulations and who enroll children that are not eligible to receive Head Start services.

3. Delegate agencies must notify the Denver Great Kids Head Start Executive Director and Family Services Director of incidents involving the intentional violations of eligibility determinations, including the administrative actions taken.
Section 2.G.4. Volunteers

Effective Date: 10/26/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start is pleased to accept the services of parents and community members as volunteers to the Denver Great Kids Head Start administrative office from time to time. The use of volunteers assists Head Start in meeting its in-kind requirement of 20 percent to match the federal grant and to increase the number of adults who support Denver Great Kids Head Start’s work with children and families.

PROCEDURE:

1. **VOLUNTEERS AT THE CITY OFFICE:**

   When a person specifies that he or she would like to assist at the City Office, if it is determined that a need exists, he or she will receive a volunteer job description, orientation and training, a schedule, and a handbook of standards, policies and procedures. The volunteer will sign an agreement and will receive an evaluation on services rendered.

2. **RESOURCE DEVELOPMENT:**

   Staff and Policy Council will be trained on their responsibilities to educate the general public about Head Start and to help recruit volunteers. The grantee will also use presentations, mailings, and volunteer recruitment cards as a means of recruiting volunteers.

3. **STUDENT INTERNS:**

   The grantee is committed to working with student interns. Internships are available through the Mayor’s Office and are generally intended for college students and graduates and can be used to earn college credit.
Section 2.G.5 Staff Physicals

Effective Date: 10/26/00          Revision Date: 5/1/17          Approval Date: 5/23/17

POLICY:

Denver Great Kids Head Start and delegate agencies must assure that each staff member has an initial health examination and a periodic re-examination (as recommended by their health care provider or as mandated by State, Tribal, or local laws) so as to assure that they do not, because of communicable diseases, pose a significant risk to the health or safety of others in the Early Head Start or Head Start program that cannot be eliminated or reduced by reasonable accommodation. Delegate agencies are encouraged to follow the recommended health screenings for new hires in order to determine whether or not the initial screening and periodic follow-up should include screening for tuberculosis. This requirement must be implemented consistent with the requirements of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act and Head Start regulations at 45 C.F.R. 1302.93.

PROCEDURE:

1. Head Start Grantee Staff will receive an initial health examination as mandated by the Head Start Program Performance standards and the Colorado Department of Human Services, the Division of Child Care, RULES REGULATING CHILD CARE CENTERS (LESS THAN 24 HOUR CARE) or the Child Care Rules and Regulations or other subsequently developed pilot child care rules and regulations.

2. The initial health examination must be dated no more than 6 months prior to employment or within 30 days after the date of employment.

3. The initial health examination will include a screening for tuberculosis if that is the recommended practice of the health provider.

4. The grantee staff member’s licensed medical provider will determine periodicity of subsequent medical testing and reexaminations, at a minimum of every five years.

REFERENCES:

1. RULES REGULATING CHILD CARE CENTERS (LESS THAN 24 HOUR CARE), 2/04, 7.702.51

Section 2.G.6. Criminal Background Checks

Effective Date: 2/1/08  Revision Date: 5/1/17  Approval Date: 5/23/17

POLICY:

This policy statement sets forth the criminal background check requirements for staff hired by the Denver Great Kids Head Start Program through the Office of Human Resources of the City and County of Denver. Consistent with Section 648A (g) of the Head Start Act of 2007 and regulations at 45 C.F.R 1302.90 (b) the following safeguards will be taken to ensure program compliance:

Before Denver Great Kids Head Start Program employs a staff paid in whole or in part by Head Start funds, the agency shall:

1. conduct an interview with the individual (including participation of the Head Start Policy Council);
2. verify the personal and employment references provided by such individual; and
3. obtain –
   a) a Colorado Bureau of Investigation criminal record check covering all Colorado jurisdictions or;
   b) an IBC (Intelligent Background Check) for all Colorado counties.
   c) the program will have 90 days after an employee is hired to complete the background check by obtaining:
      i. whichever check listed above was not obtained prior to hire date; and
      ii. child abuse and neglect state registry check if available.

4. Employees are not to be considered permanent until such a background check is completed.
5. Newly hired employees and consultants must not have unsupervised access until the background check progress is completed.
6. A complete background check of all employees and consultants must be conducted every five years.
Section 2.H. Community Partnerships and QRIS

Effective Date: 11/1/16  Revision Date: 5/1/17  Approval Date: 5/23/17

Denver Great Kids Head Start is a program within the Office of Children’s Affairs, an office within the City and County of Denver created by City Ordinance in 2012 and part of the Mayor’s Office. As a result, it is a sister organization to other key departments and offices such as the Department of Social Services, the Denver Housing Authority, the Department of Environmental Health and the Office of Economic Opportunity and as a result, close working arrangements have been developed in key areas impacting the Head Start programs and its families.

In addition, DGKHS has a formal Memorandum of Understanding (MOU) with Denver Public Schools, the Local Education Agency (LEA), as required by Section 642 (e) (5) of the Head Start Act. This MOU is inclusive of all six current delegate agencies and as a result it is not necessary for the delegate agencies to create independent MOU’s except in the cases for those who are also grantees under the Early Head Start program.

All DGKHS delegate agencies participate in the state’s QRIS system, Colorado Shines as Head Start programs and are ascribed a minimum rating of Level 4. Delegate agencies are eligible to work independently with the State QRIS in order to increase their ratings.

DGKHS and its delegate agencies participate in Ready to Succeed, a program within the State of Colorado’s Department of Education’s Office of Early Education and the repository for child assessment data.
Section 2.I. Training

Effective Date: 11/1/16  Revision Date: 5/1/17  Approval Date: 5/23/17

Training on roles and responsibilities for Policy Council members is provided on an annual basis in order to ensure that both groups have sufficient knowledge and information to allow them to fulfill their roles and responsibilities in accordance of Section 642 (c) (3) of the Head Start Act. Additionally, as new Policy Council members are seated annually they also receive training the eligibility determination process that is implemented by DGKHS and aligned to the requirements of 45 CFR 1302.12 (m). In the event of changes in the membership of the Governing Body (as the result of municipal elections in the City of Denver every four years), new members also receive this training within 180 days of their election/appointment into their new roles.
Section 3: Fiscal Management

A. Fiscal Operations
B. Conference /Travel Policy
C. Single Audit
D. Financial Reporting to Grantor and Policy Council/Policy Committee
E. Fiscal Training for Governing Bodies
F. Internal Control
G. Property Management, Fixed Assets, Inventory
H. Procurement
I. Budget
J. Accounts Payable
K. Accounts Receivable
L. Reimbursement
M. Insurance
N. Administrative Cost
O. Non- Federal Share
Section 3.A. Fiscal Operations

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

POLICY:

Denver Great Kids Head Start (DGKHS) will maintain fiscal integrity through implementation of internal controls. This involves a financial system that ensures budget management, maintains control over current operations, and provides a complete and accurate record.

Denver Great Kids Head Start is a part of City and County of Denver’s (CCD) Office of Children Affairs and operates within the financial information system of the City and County of Denver. DGKHS operates under the City and County of Denver fiscal accountability rules. DGKHS also incorporates policies established by the Head Start Policy Council and Grantee Board.

DGKHS Financial Services Team is part of City and County of Denver’s Office of the Controller’s - Financial Services which has a service level agreement with Office of Children Affairs.

DGKHS/CCD follows Generally Accepted Accounting Principles and utilizes a modified accrual basis of accounting.

The CCD fiscal accountability rules can be found online at:


PROCEDURES:

1. Delegate agencies forward a copy of the Single Audit report by mail or fax to the city office, as soon as it is received, with a cover letter citing deficiencies and a plan to correct the deficiencies (if applicable).

2. Delegate agencies respond within one-week (five (5) business days) to any questions on the plan from the chief fiscal officer of Denver Head Start.

3. As needed, Denver Great Kids Head Start Executive Director, in conjunction with City’s Controller’s Office representative will set an appointment with the delegate agency’s financial manager, executive director and/or Head Start director to discuss deficiencies and the corrective actions to be taken.

4. The City Controller’s Office representative will report findings from the follow-up visit to the joint Program - Fiscal Committee of the grantee Head Start Policy Council.
Section 3.B. Conference/Travel Policy

Effective Date: 11/12/03  Revision Date: 02/1/2017  Approval Date: 02/21/17

**POLICY:**
The Denver Great Kids Head Start Policy Council offers many training opportunities. Some opportunities are local but other require members to travel. In such cases members will be required to follow a set of procedures in order to be eligible to travel on DGKHS business. The major steps of this process are outlined below.

**PROCEDURE:**
1. All DGKHS Policy Council members interested in traveling to a conference/training must complete the DGKHS Policy Council Travel Application. To initiate the travel process members must submit a written statement of interest detailing:
   a) Why they are interested in attending the conference/training?
   b) The expected benefits from attending this conference/training will be for the individual, child, family and Head Start program?
   c) Personal Interests in traveling/attending conference?

   The statement of interest shall be submitted to the DGKHS Family Services Director at least 6 weeks prior to the anticipated travel date.

2. Upon receiving written interest statements DGKHS will provide interested Policy Council members with the complete application for their completion. The complete application packet consists of:
   a) DGKHS Policy Council Travel Application form; including legal name of applicant, correct spelling that is the same as legal identification (Driver’s License, Colorado ID, etc.), DOB and,
   b) contact information, including emergency contact information

   Brief Questionnaire consisting of:
   a) Travel experience
   b) Previous conference experience

3. Completing a W-9 application for the City and County of Denver
4. Letter of reference, preferably from their delegate agency
5. Completing and signing travel agreements including:
a) Attendance to mandatory pre-travel meeting where the travel process, city code of conduct will be reviewed, understanding the reasons for early returns and dismissal.
b) Appropriate use of city/Head Start funds
c) Agreeing to complete the City’s Travel reconciliation process within the prescribed city policies
d) Conference attendance and daily conference check in requirements
e) Completing a conference attendance report
f) Agreeing to fulfill a Post conference report presentation/report back to Policy Council

6. DGKHS will rank completed applications using the rank order criteria established by the 2015-2016 Policy Council participants:
a) Meeting attendance and participation
b) Policy Council Parent Representative
c) Policy Council Community Representative
d) Never attended an out of state conference before
e) Previously attended a conference
f) Policy Council Alternate

7. Selected members will receive notification and the entire Policy Council will be made aware of the selected members.

1. APPROVAL:

All travel requests are approved by the Head Start Executive Director. Final approval for any requests for travel funded by Head Start (and all City agencies) is subject to final approval by the Director for Children’s Affairs. All out of state travel must be approved according to the City Travel Policies and Procedures. Once approval has been received, those individuals selected will be notified and the travel arrangements will be made. If the travel request is denied, those individuals selected for travel will be notified. All Policy Council members will be advised at the next subsequent meeting of the outcome of the request.

2. CONFERENCE ATTENDANCE EXPECTATIONS:

a) Conference attendees will attend the sessions and workshops at conferences. Upon their return, attendees will provide written materials and make a short presentation to the Policy Council or delegate agency policy Councils/Committees.
b) Receipts must be reconciled within 10 days of the trip. An individual meeting will be scheduled with the appropriate administrative staff person for this purpose.
c) Any travel modifications to hotel, travel or other expenses that exceed the allocated cost will be paid by the attendee and acknowledged in writing in advance of the travel.
**Section 3.C. Single Audit**

Effective Date: 7/1/14  Revision Date: 6/1/17  Approval Date: 6/27/17

**POLICY:**

Denver Great Kids Head Start requires each delegate agency to submit its Single Audit report to the grantee as soon as the report is received from the agency’s Certified Public Accounting firm. When audit deficiencies are cited in the Single Audit reports, a corrective action plan must be developed and presented to the delegate agency’s governing board and that board must provide Denver Great Kids Head Start with a written copy of its approved plan within one-week (five (5) business days) of the governing board’s approval of the plan. The Single Audit must be bid out in order to get the best possible price and service.

**PROCEDURES:**

1. DGKHS is part of City and County of Denver single audit and will be included in the annual audit of CCD. The City and County of Denver may request special audits. Audits are posted on the CCD website annually: [https://www.denvergov.org/content/denvergov/en/denver-department-of-finance/financial-reports/single-audit-report.html](https://www.denvergov.org/content/denvergov/en/denver-department-of-finance/financial-reports/single-audit-report.html)

2. Delegate agencies forward a copy of the Single Audit report by mail or fax to the Head Start Fiscal Team, as soon as it is received, with a cover letter citing deficiencies and a plan to correct the deficiencies (if applicable).

3. Delegate agencies respond within one-week (five (5) business days) to any questions on the plan from the Fiscal Administrator or Executive Director of Denver

4. As needed, Denver Great Kids Head Start Executive Director, in conjunction with City’s Controller’s Office representative will set an appointment with the delegate agency’s financial manager, executive director and/or Head Start director to discuss deficiencies and the corrective actions to be taken.

5. The City Controller’s Office representative will report findings from the follow-up visit to the joint Program - Fiscal Committee of the grantee Head Start Policy Council.
Section 3.D. Financial Reporting to Grantor & Policy Council/Policy Committee

Effective Date: 6/23/14  Revision Date: 6/1/17  Approval Date: 6/27/17

**POLICY:**

Denver Great Kids Head Start and its delegate agencies shall provide regular fiscal reports to the Policy Council/Policy Committee. At a minimum, the fiscal report shall contain information provided in the monthly reconciliation report required each month by the grantee from each agency and include financial statements, including credit card statements. If adjustments are made to the budget, they must be reflected in the financial reports the month following approval. A footnote on the report should explain all budget changes.

SF 425, “Federal Financial Report” will be filed on a first quarter, semi-annual and annual basis within 30 days after the end of the reporting period, and a final report will be submitted no later than 60 days after annual report.

PMS 272, “Report of Federal Cash Transaction Report” will be submitted within 30 calendar days following the end of each quarter.

An DGKHS/CCD Financial Statement will be posted annually on the CCD Website:


Bank reconciliation will be a function of CCD_Office of Controller’s Accounting Team and general ledger reconciliation CCD_Office of Controller’s Account Service Team for OCA-DGKHS.

**PROCEDURES:**

The grantee and delegate agencies will:

1. Use trend analysis (from variance reports from prior years) to forecast expenditures/prepare projection report.
2. Explain variances of 10 percent or more and over $1000 of projected expenses.
3. Grantee will present federal reports filed with Denver Great Kids Head Start at the meeting following submission.
4. Federal Supplemental grant funding will be reported with base funding.
5. Base and Supplemental grants will be presented to Policy Council and the governing body for approval.

**THE GRANTEE WILL:**

1. Each month after the CCD fiscal period closes, the Fiscal Administrator and/or Senior Accountant will prepare reports detailing the monthly expenditures for each grant. The Fiscal Administrator and/or Senior Accountant will assign an appropriate account code to each expenditure, review reports for any irregularities and prepare a combined budget report for the Executive Director, Grantee Board and Policy Council. The combined financial reports will include the amounts budgeted, year to date expenditures, and remaining balance along all the G/L transactions detail.
and credit card expenditure report. The financial reports will be submitted to the Policy Council for review and approval. All DGKHS monthly financial reports are posted to the DGKHS website:


2. The Executive Director and/or Fiscal Administrator has primary responsibility for monitoring the financial reports and alerting board members to financial choices or problems. The Executive Director and/or Fiscal Administrator will be responsible for assuring overall compliance with grant and contract agreements, and consequently must monitor the financial activity for each grant/contract and take corrective action if problems occur.

3. The Fiscal Administrator and/or Senior Accountant will prepare reports detailing financial information for SF-425 and any other grant reports. The Fiscal Administrator and/or Senior Accountant will review the reports for accuracy, and have the OCA Director and Executive DGKHS Director review and sign. Fiscal Administrator and/or Senior Accountant upload to www.govsolutions.gov and/or email the reports to the Program Representative.

4. At the end of each fiscal quarter, the Senior Accountant will prepare the PMS 272 and submit it electronically. A copy will be sent to the Fiscal Administrator.
Section 3.E. Fiscal Training For Governing Bodies

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

POLICY:

Denver Great Kids Head Start and each delegate agency will provide fiscal training for its governing bodies including requirements of reviewing and approval of all financial reports like budgets, budget changes, credit card expenditures and etc.
Section 3.F. Internal Control

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

POLICY:

Denver’s Great Kids Head Start and its delegate agencies and vendors must adopt, document and follow accounting policies and procedures that provide for separation of duties, with clearly defined authority and execution of all financial transactions. Denver Great Kids Head Start will follow appropriate federal, state and local laws (including City Controller’s Office) along with the delegate agencies and vendors.
Section 3.G. Property Management, Fixed Assets, Inventory

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start follows the policy of the City and County of Denver on tracking fixed assets. Therefore, Denver Great Kids Head Start requires that delegate agencies and vendors track purchases for all single items with an original cost of $5000 or greater and a useful life of more than one year. All equipment must be properly labeled as belonging to Denver Great Kids Head Start. A control system must be in place to ensure that equipment is properly cared for and protected against loss or theft. Physical inventory of Head Start equipment must take place once each year. Certification of physical inventory will be submitted by September 30 each year by all delegate agencies to the city. SF 429, “Real Property Status Report” & SF 428 “Tangible Personnel Property” will be filed within than 90 days of close grant reporting period.

REQUIRED:

Delegate agencies must adopt, document and follow written policies and procedures to track fixed assets according to City and County of Denver standards. The grantee and delegate agencies will:

1. Reconcile balances of fixed asset (prior years) and fixed asset expenses (current year) for Head Start equipment against tracking mechanism, with appropriate account balances and/or spreadsheets listing all Head Start equipment.

2. Use fixed assets software or spreadsheets that contain all the information on the capital equipment. In addition, indicate the percentage of federal participation dollars in the purchase of each item.

3. Document and follow adequate security measures to prevent theft of property.

4. Document and follow manufacturer’s suggested equipment maintenance schedules to care for property.
Section 3.H. Procurement

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

DGKHS will follow the procurement policies and procedures outlined in the CCD Fiscal Accountability Rules 8.1, Head Start Act, 45 CFR Chapter and OMB Circulars. The Head Start Director and OCA's Deputy Director or Director will approve all purchases. The Fiscal Manager will approve all other purchases. All personnel involved in authorizing procurements are required to read and familiarize themselves with the procurement standards outlined in the policies and regulations mentioned above.

Each Denver Great Kids Head Start delegate agency must adopt, follow and document policies and procedures for procurement of non-construction goods and services that conform to federal and city purchasing rules and regulations. Procurement will be in accordance with the current contract between the city and delegate agency.

PROCEDURE:

1. Employees will submit an Internal Purchase Request Form to the Head Start Director. The Head Start Director and when need the Fiscal Administrator will review the proposed purchase to determine:
   a. If the item is actually needed
   b. If there are funds available to purchase the item
   c. If the item is an allowable cost

2. After approvals, the Office Manager and/or Program Director will purchase with correct method procurement method like P-card, Nonpoor, PO, and contract depending on the amount of the service or good. Which method is compliant with CCD Fiscal Accountability Rules Chapter 8 – Procurement Process

3. Head Start petty cash funds are only used for non-Employee reimbursements like Policy Council members for incidental expenses. Petty cash reimbursement requests are to be submitted to the DGKHS Office Manager. The DGKHS Office Manager will prepare a non-PO voucher and submit to City’s Accounts Payable for a check. The DGKHS Fiscal Team will perform at least 2 audits of the petty cash funds on an annual basis. CCD Fiscal Accountability Rules Chapter 3.2 – Petty Cash

4. Equipment purchased with federal/state funds that has a useful life of more than one year and cost more than $5000 will be recorded in the CCD inventory system. Equipment with useful life less than one year and/or cost of $4,999 or less depending on the type of purchase will be put on the CCD inventory system as control asset like computer and furniture & equipment and/or expended like non-computer related items. CCD Fiscal Accountability Rules Chapter 4.2 – Capital & Controlled Assets & 2 CFR 200.313 Equipment
5. The DGKHS Director and/or Fiscal Administrator will ensure that all facility purchases, major renovations, and construction adhere to the requirements of the Davis-Bacon Act:
Section 3. I. Budget

Effective Date: 12/8/05       Revision Date: 7/1/14       Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start (DGKHS), its delegate agencies and vendors must report non-federal share on the monthly variance report and on the quarterly cost allocation report. The allow ability and amount of non-federal share reported is monitored by the grantee.

1. BUDGET DEVELOPMENT:

As a program within the Office of Children's Affairs (OCA), DGKHS aligns its goals with the Mayor’s goals for the City and County of Denver as implemented in OCA. DGKHS develops short and long-term goals and financial objectives that support the accomplishment of program goals and objectives in the most effective and efficient manner possible. While financial goals are established to coincide with multi-year budget years, the budget is formulated on an annual basis. In addition, the budget is developed as part of a strategic planning process that is based on data collection, analysis and best practice.

2. PROJECTIONS:

Each year, based on the Application of Federal Assistance (SF424A), Denver Great Kids Head Start and its delegate agencies must prepare a projection of monthly expenses. The projected monthly expenses will be classified by categories as listed on Denver Great Kids Head Start Variance Report. In addition to the projection of the use of federal funds, monthly projections will include a projection of non-federal resources the delegate agency anticipates to be collected in any given month.

3. VARIANCE:

a) Each month, comparisons of actual expenses with budget amounts are reported in a Variance Report by Denver Great Kids Head Start, its delegate agencies and vendors. An explanation of any variances exceeding 10 percent and at least $1,000.00 of the year to date projections must be provided. The explanation must include how and when the variance will be eliminated. The delegate agency director or his/her designee must acknowledge by signature or initial the explanation of the variance. Once a variance is reported and explained, it does not need to be addressed again.

b) When determining how to eliminate a variance, the delegate agency must keep in mind that certain categories of Head Start funds cannot be used to make up variances between budgeted and actual spending. The category is training and parent activities. Changing the amount to be spent in any category must receive prior approval of the grantee. Decisions made to eliminate a variance constitute a budget revision and must be submitted in writing to the grantee.
4. **VARIANCE POLICY:**

   a) Review grantee and delegate agency variance reports quarterly.

   b) The city will contact delegate agencies to discuss variances.

5. **REVISION:**

   1. A written request to the grantee for the approval of a budget revision is necessary for proposed equipment purchases that have not received prior approval as part of the original application. A written request for approval of a budget revision is also necessary when funds awarded for construction purposes are in excess of the need of the recipient and the recipient would like to use remaining funds for another purpose. A written request for approval of a budget revision is required when the cumulative transfer among direct cost budget.

   If the grantee requests a revision in its budget, approval must be obtained from ACF Region VIII. Categories which would exceed 25 percent of the total approved budget (which includes direct, indirect, and federal or required matching or $250,000.00 whichever is less require prior approval.
Section 3. J. Account Payable

Effective Date: 12/8/05  Revision Date: 7/1/14  Approval Date: 6/27/17

All bills will be paid according the CCD payment terms and/or contract payment terms.

PROCEDURE:

1. All invoices/statements from vendors will be routed to the Program Director and/or Staff member associate with the purchase who will review them to determine if the items or services have been received. Also, Fiscal Staff review the Delegate’s and/or Sub recipient’s reimbursement invoice for allowable cost.

2. The Head Start Director will approve payment of all invoices by email and/or signing the invoice. Which the Head Start Director the approved invoice Fiscal Team to process the payment.

3. The Fiscal Manager will maintain copies of invoices, order confirmation and packing slips for each fiscal year. If materials arrive without a packing slip, the Fiscal Manager will note the specific materials received and the date received on the invoice or order.

4. The approved original invoice will be sent to the CCD Accounts Payable (AP) Team. Accounts Payable staff will audit the invoice for the proper account code, vendor address, and payment date. AP staff will process the payment thru the CCD financial system, which will generate a check to the vendor.

5. Checks or ACH will be run from the CCD Financial system daily in the CCD Office of the Controller. CCD Office of the Controller staff will mail checks, unless otherwise requested.

6. All invoice and check information will be maintained in the CCD Financial system and Document Imaging System.
Section 3. K. Account Receivable

Effective Date: 12/8/05       Revision Date: 6/1/17       Approval Date: 6/27/17

The DGKHS Fiscal Team (Senior Accountant and/or Accounting Tech) will deposit all cash and checks received by Head Start at the CCD Treasury office. The DGKHS Fiscal Team (Senior Accountant and/or Accounting Tech) will process deposit journal thru the CCD financial system moving the deposit from the general cash account to the funding and account associate with the deposit.
Section 3. L. Reimbursement

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

Denver Great Kids Head Start will receive funds on a reimbursement basis for both the state and federal grants. The DGKHS shall drawdown grant funds from the grantor(s) no later than the end of the month following the month in which the expenditure(s) occurred. **CCD Fiscal Accountability Rules Chapter 9.2 – Grant Management**

**PROCEDURE:**

1. After the monthly period closes, the Fiscal Administrator and/or Senior Accountant will run reports to determine the amount of cash to be requested from the Payment Management System (PMS) for the federal grant, and from the Electronic Grants Management System (EGMS) for the state grant.

2. For the federal grant, the Fiscal Administrator and Head Start Director review and approve monthly financials. The Fiscal Administrator will send an e-mail to the Senior Accountant, and request a cash drawdown for the appropriate amount. The Senior Accountant will prepare the cash drawdown in the PMS system. Funds will be deposited electronically into the CCD bank account, and then journal into the DGKHS grant account.

3. For the state grant, the Fiscal Administrator and/or Senior Accountant will go to the online EGMS system and request a drawdown in the appropriate amount. The Fiscal Administrator and/or Senior Accountant will inform the EFT desk of the amount requested by e-mail. Funds will be deposited electronically into the CCD bank account, and then journal into the DGKHS grant account.
Section 3. M. Insurance

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

DGKHS will, at a minimum, provide the equivalent insurance coverage for real property and equipment acquired with HHS funds as provided to other property owned by the recipient.

**PROCEDURE:**

DGKHS property will be covered under City and County of Denver insurance policies. All Delegates and Vendors need to be compliant with the insurance requirements in their awarded contracts.
Section 3. N. Administrative Cost

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

Allowable costs for developing and administering a Head Start program will not exceed 15 percent of the total approved costs of the program.

PROCEDURE:

Each month, administrative costs will be calculated based on expenditures. The Senior Accountant will monitor costs to ensure that this percentage is not exceeded, and Fiscal Administrator will review for accuracy.
Section 3. O. Non-Federal Share

Effective Date: 1/1/00          Revision Date: 6/1/17          Approval Date: 6/27/17

Federal financial assistance granted under the Head Start Act will not exceed 80 percent of the total costs of the program. Twenty percent of total program costs will be acquired from non-federal sources.

PROCEDURE:

To satisfy the federal matching or cost-sharing requirement, DGKHS along with Contractors and Delegates will account for the allowable in-kind costs under the Head Start Act and the applicable Uniform Guidance.
Section 4: Enrollment, Recruitment, Selection, Eligibility and Attendance (ERSEA)

A. Determining Community Strengths and Needs
B. Eligibility
C. Recruitment
D. Selection
   D.1 Universal Selection Criteria
E. Enrollment
   E.1 Voluntary and Involuntary Withdrawal of Children
F. Attendance/Absentee Children
G. Fee’s Before/After Care
H. Home Visits
I. Transfers Between Denver Great Kids Head Start Delegates
J. Eligibility Training and Treatment of Families
Section 4.A. Determining Community Strengths and Needs

Effective Date: 1/1/00  Revision Date: 6/1/17  Approval Date: 6/27/17

POLICY:

In accordance with 1302.11 Denver Great Kids Head Start and its delegate agencies will perform a Community Assessment every five year, with updates conducted the second, third, and fourth years of the five-year grant cycle.

Results from the Community Assessment will be used to ensure that the community strengths and needs identified are adequately integrated into services and overarching approach of Denver Great Kids Head Start in the City and County of Denver. As per the Head Start Regulations the results from the Community Assessment and Updates will be analyzed, as required and used to:

1. Revise program philosophy, as needed, and develop short and long-term program goals and objectives
2. Determine program options, services, and center locations
3. Identify key recruitment areas or high need areas within the City and County of Denver and,
4. criteria factor that assign priority to children and families

Results and findings from the Community Assessment will be shared with the community, presented to Head Start staff, management, Policy Council/Committee and Governing Body.

The Community Assessment will include information related to:

1. Demographic data on the number of preschool age children
2. Number of children experiencing homelessness
3. Number of children with disabilities, including the types of disabilities
4. Number of children in foster care
5. Education, health, nutrition and social service needs of Head Start eligible children and their families
6. Typical work, school, and training schedules of parents with eligible children
7. Community resources that are available to address the needs of eligible children and families
8. Information on other early education, pre-school, childcare programs that serve eligible children
Section 4.B. Eligibility

Effective Date: 5/27/08      Revision Date: 5/1/2017      Approval Date: 5/27/2017

POLICY:

Consistent with Federal Regulations at 45 CFR 1302.12 and guidance provided by the Office of Head Start, Head Start staff must conduct a family interview to the extent possible or at a minimum a phone interview with potential Head Start families (if a phone interview is conducted- staff must document the reason for the phone interview). During family interviews staff must verify eligibility for the Head Start program based on the following categories; age, income, and residency. Children determined eligible for Head Start shall remain eligible through the end of the succeeding program year except if the delegate agency has compelling reasons not to.

1. AGE VERIFICATION:

Delegate agencies must develop and implement policies and procedures consistent with this policy to ensure that children eligible for Head Start are at least three years old on or before October 1st (the eligibility date used by Denver Public Schools) and not older than five on or before October 1st (not older than the age required to attend school). Denver Great Kids Head Start delegate agencies may enroll children who turn three after October 1st so long as they are three by the date eligibility is determined or the child’s first day of Head Start services. Children who transition from Early Head Start to Head Start are exempt from age eligibility requirements. Transition from Early Head Start to Head Start should be developmentally appropriate and be considered on a case by case basis.

Proof of age documents to review when determining age eligibility are:

a) Certified Birth Certificate, or  
b) Hospital Birth Certificate/Record, or  
c) Health Department Birth Certificate, or  
d) Other: Immunization Records stating date of birth, Passport, Visa, Baptismal Record

Delegate Agencies may accept other documents as needed per each family’s situation.

Denver Great Kids Head Start and its delegate agencies cannot require families to provide documents that confirm a child’s age if doing so creates a barrier for the family to enroll. Instead, staff must support families in accessing resources to attain necessary documents.

2. RESIDENCY VERIFICATION:

The established service area for the Denver Great Kids Head Start program consists of the entire City and County of Denver (see map attached). Therefore, all delegate agencies are prohibited from recruiting and enrolling Head Start families who do not reside within the City and County of Denver.

Children applying for the Denver Great Kids Head Start program must reside within the established service area; City and County of Denver unless they are homeless and qualify under the McKinney Vento Act. In some cases, foster care children may reside outside of the City and
County of Denver. However, these situations must be dealt on a case by case basis between the grantee office and the enrolling delegate agency.

Denver Great Kids Head Start delegate agencies must develop and implement policies and procedures consistent with this policy to ensure that only children and families who reside within the established service area for Denver Great Kids Head Start program are recruited and enrolled in the program. To ensure compliance with the Denver Great Kids Head Start Service area delegate agencies must collect proof of address documentation from Head Start families. Proof of address documentation must be dated within the last 12 months from the date eligibility is established and programs must collect an updated proof of address annually. Accordingly, delegates may choose to use any of the following documents as proof of residency:

a) Lease agreement, mortgage statement, signed and dated letter from landlord, A dated utility bill: energy/water/cable, phone/credit card statements. If the family is homeless programs should accept a letter from a homeless services provider, school personnel or other service agency attesting that the child is homeless. If the family is unable to provide any of those the delegate agency may accept a residency affidavit and or self-declaration statement with a consented third-party verification. Delegate agencies may accept other documents as needed per each family’s situation.

3. Eligibility Verification:

<table>
<thead>
<tr>
<th>Eligibility Category</th>
<th>Determining, Verifying, and Documenting Eligibility using:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Income</td>
<td>a) Self-Declaration with consented third-party verification</td>
</tr>
</tbody>
</table>
| Family’s income is equal to or below the poverty line; or family’s income is above the poverty is between 100-130% can be to 10% percent of total enrollment. | 1. Use tax forms  
  2. Use pay stubs  
  3. Use other proof of income for the relevant time-period  
  4. If a family cannot provide any of the documents listed above the program must accept written statements from employers, including individuals who are self-employed, for the relevant time-period |
| Family is eligible or, in the absence of child care, would be potentially eligible for public assistance including TANF child-only payments. | Have documentation from either the state, local, or tribal public assistance agency that shows the family either receives public assistance or shows the family is potentially eligible to receive public assistance. |
| Homeless as defined by McKinney-Vento | Written statement from a homeless service provider, school personnel, or service agency indicating homelessness. From a public or private agency:  
  a) A declaration/information gathered on enrollment or application forms  
  b) A self-declaration with a consented third-party verification |
c) Family interview notes from staff can be used if a family cannot provide documents to prove the child is homeless.  
d) A program may accept the family’s signed declaration to that effect. Programs may also accept staff declarations describing a child’s living situation that meets the definition of homeless in section 1305 of the Head Start regulations.

<table>
<thead>
<tr>
<th>Foster care/Kinship care</th>
<th>To verify whether a child is in foster care or kinship care, program staff must accept either a court order or other legal or government-issued document, a written statement from a government child welfare official that demonstrates the child is in foster care, or proof of a foster care payment.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Assistance: SSI or TANF</td>
<td>Documentation dated within the past 12 months from TANF or SSI</td>
</tr>
</tbody>
</table>

All Denver Great Kids Head Start delegate agencies should use the Head Start Eligibility verification form issued by the Office of Head Start.  
OMB 0970-0374 with the expiration date of 3/31/19  
See attached in appendix.

4. **ELIGIBILITY REDETERMINATION:**

   a) If a child moves from an Early Head Start program to a Head Start program the family’s eligibility verification must be completed.  
   b) Eligibility redetermination must be completed for any Head Start children continuing for a third year.  
   c) If for any reason a family decides to dis-enroll regardless of the length of time they were unenrolled, eligibility verification must be re-determined and if applicable the child must be added to the waitlist.

Eligibility determination records at a minimum must include:

   a) A completed, signed and dated Head Start Eligibility verification form  
   b) Copies of any documents or statements, including declarations used to verify eligibility  
   c) A statement from eligibility staff confirming reasonable efforts made to verify information by conducting an in person or telephone interview including third party verifications with consents  
   d) A statement identifying the category in which the family is eligible

5. **RECORDS:**

As per section 1302.12 of the Head Start regulations eligibility determination records must be kept on file for children currently enrolled, for as long as they are enrolled, and for one year after they have dropped receiving services or are no longer enrolled
All DGKHS delegate agencies will develop a Head Start recruitment plan that targets the program and service needs identified in the community assessment. Children and families with the greatest need for Head Start services are to be given priority in recruitment efforts. All agencies must develop and present a recruitment plan to their policy committee for review, input and approval on a yearly basis. All approved delegate agency recruitment plans will be submitted to the grantee office’s Family Services Director during the spring before the start of the next program year. The DGKHS grantee office will allocate Head Start funds to support grantee wide recruitment efforts. The grantee Office will develop a recruitment plan that will be presented for the family services/ ERSEA coordinators for review input and approval as well as the DGKHS Policy Council on a yearly basis.
Section 4.D. Selection

Effective Date: 7/01/15  Revision Date: 5/4/2017  Approval Date: 5/27/17

Denver Great Kids Head Start and its' delegate agencies should have consistency in selection criteria factors to ensure programs are serving children with the greatest need. Between fifty and sixty percent of the selection criteria factors will be uniform across all 6 delegate agencies of Denver Great Kids Head Start. The remaining fifty to forty percent of the factors of selection criteria shall be determined by each delegate agencies taking in consideration needs in the community.

Selection criteria shall be reviewed by each delegate agency on a yearly basis. The grantee’s universal selection criteria factors will be reviewed annually. When changes are necessary the revised criteria will also be reviewed and approved by the delegate Policy Council/ Committee and if changes are applicable to the universal selection criteria factors the approval from the grantee’s Policy Council will be needed. Revised selection criteria from delegate agencies shall be submitted to the Grantee as they are updated. Please refer to the criterion table attached.
Section 4.D.1 Universal Selection Criteria

119 out of 200 is 59.5 percent leaving agencies with 40.5 percent to develop

<table>
<thead>
<tr>
<th>50 POINTS Maximum</th>
<th>Income Eligibility (include TANF and SSI)</th>
</tr>
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<tbody>
<tr>
<td><strong>Categorical Eligibility</strong></td>
<td><strong>Income Eligibility</strong></td>
</tr>
<tr>
<td>Homeless (50 Points)</td>
<td>TANF or SSI (40 Points)</td>
</tr>
<tr>
<td>Foster Care (50 Points)</td>
<td>Income Below 100 Percent of FPL (40 Points)</td>
</tr>
<tr>
<td></td>
<td>Income Between 101 and 115 Percent of FPL (0 Points)</td>
</tr>
<tr>
<td></td>
<td>Income Between 116 and 130 Percent of FPL (-5 Points)</td>
</tr>
<tr>
<td></td>
<td>Income Above 130 Percent of FPL (-10 Points)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Factors</th>
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</thead>
<tbody>
<tr>
<td>15 Points</td>
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<tr>
<td>10 Points</td>
</tr>
<tr>
<td>10 Points</td>
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<tr>
<td>5 Points</td>
</tr>
</tbody>
</table>
**Section 4.E. Enrollment**

Effective Date: 10/26/00  Revision Date: 7/1/14  Approval Date: 8/26/14

**POLICY:**

All Denver Great Kids Head Start delegate agencies must strive to maintain 100% enrollment at all times and fill any vacancy within 30 days, this includes from day one of the program until the last day of the program. Denver Great Kids Head Start delegate agencies will adopt, follow, document, train and supervise staff to support the following policy:

1. **ENROLLMENT:**

   a) 30-day enrollment opportunities:
   
   i. When a child drops out of Head Start, the slot will be counted as an enrollment opportunity for the first 30 days, starting from the date the child withdrew. If the slot is not filled after 30 days, it shall be considered a Head Start vacancy and the agency will be considered under enrolled.

   b) In accordance with 45 CFR 1302.12 (d) (2) Over-income enrollment reports will be collected annually describing the need to serve children whose income falls between 100 and 130 percent of poverty and how the agency is meeting the need of low income families, outreach efforts policies and procedures, selection criteria, criteria of each child on the agencies waitlist.

   c) Vacancy attendance reporting for families who have not given notice

      When a child has been absent 30 days and all attempts to contact, the family have been exhausted, the slot will be declared vacant and must be filled within 30 days from when the slot was considered vacant.

2. **RE-ENROLLMENT:**

   If a child drops from the program for any reason and for any length of time eligibility staff must re-verify eligibility or be added to the weighted waitlist if a slot is not available.

   Monthly, (the 5th of every month) all Denver Great Kids Head Start delegate agencies will submit an enrollment report detailing:

   1. Eligibility type of all the children enrolled
   2. Number of children served that month who are homeless or in foster care
   3. The agencies total enrollment
   4. Number of Head Start 30-day enrollment opportunities
   5. The number of drops and reasons for drops
Section 4.E.1. Voluntary, Involuntary Withdrawal and Expulsion of Children

Effective Date: 2/14/14  Revision Date: 7/01/14  Approval Date: 5/23/17

**Policy:**

If a parent decides to voluntarily withdraw his/her child from the Head Start program, every attempt is made by Head Start staff to determine the cause. All feasible attempts are made to maintain a child's enrollment in the program.

**Procedure:**

1. When Head Start learns that a parent is considering withdrawing their child, an attempt to determine the reason is made. Staff will work with the parent to eliminate or reduce any problems identified relating to the potential withdrawal of the child and will encourage the parent to allow the child to remain in the program. The only exception is when a child is to be withdrawn due to medical reasons and remaining in the program would be detrimental to the child's health. Staff will try to persuade the parent(s) to postpone a final decision regarding withdrawing the child until all attempts to solve any problems are exhausted.

2. Staff will make the initial contact to summarize the initial meeting contact on a Family Contact Form or data system.

3. The family service staff must immediately schedule a home visit to determine if the parent(s) will allow the child to remain in Head Start. A resolution of any conflict or problems concerning the family or child is then suggested by the family service staff. Information about benefits the child derives from remaining in Head Start is made at this time. Documentation of this conference is made by the family service professional on Family Contact Form.

4. The family service professional informs the child’s teacher of the conference and whether the parent has been persuaded to allow the child to remain in Head Start. A careful review of the parent’s concerns or reasons for considering withdrawal is discussed between the family service professional and the teacher. Documentation of the family service professional/teacher conference summarizing the problem is completed.

5. If the parent(s) still insist on withdrawing the child from the program, the teacher and family service professional proceed with the withdrawal procedures.

6. Final approval of the withdrawal is made by the Delegate Head Start Director after ensuring everything possible has been done to prevent the child from withdrawing.

7. In certain situations, it may be necessary for a child to be involuntarily withdrawn from the Head Start program.

1. **Factor warranting involuntary withdrawal:**

   a) Irregular Attendance:

      i. If a child is consistently absent without a medical reason or a valid cause, he/she may be withdrawn from the program after the program has exhausted its efforts to reach and re-engage the family including calling, emailing, sending letters, conducting home visits if the family fails to respond within reasonable time the slot shall be considered vacant.
b) Extreme Health Problems:
   i. If being in the program daily is professionally declared medically harmful to the child.

2. **STEPS PRIOR TO INVOLUNTARY WITHDRAWAL:**

   a) Home visit (if parent will allow) is made by the teacher and/or family service staff to determine any problems.
      i. Every effort is made to explore all variables and options.
      ii. Documentation has been presented describing all efforts.
      iii. Alternative resources and possible placement with other agencies have been discussed.

3. **STEPS FOR INVOLUNTARY WITHDRAWAL:**

   a) Parents will receive an official notice of withdrawal from the Head Start Director which includes:
      i. Reason for withdrawal
      ii. Date and signature of the Delegate Agency Head Start Director

Parents will have five (5) working days after receiving the official notice of withdrawal to appeal the decision.

**POLICY:**

Denver Great Kids Head Start and its delegate agencies are prohibited from expelling children on the basis of behavior and shall take the necessary steps as outlined in 45 CFR 1302.17 (b) (2), (3) to protect the child’s continued enrollment.
Section 4.F. Attendance/Absentee Children

Effective Date: 1/1/00    Revision Date: 7/1/14    Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start believes children must be present in their Head Start classes and activities to benefit from Head Start services. Therefore, Denver Great Kids Head Start is mandated to maintain monthly attendance rates of 85 percent or better. Denver Great Kids Head Start delegate agencies must adopt policies and procedures that ensure that children with chronic absenteeism (three or more consecutive unexcused absences) are identified and program intervention occurs. Denver Great Kids Head Start delegate agencies must also adopt and follow policies and procedures that ensure that the program makes every attempt to work with a family whose child is absent to keep the child enrolled in Head Start and to limit unexpected absences. Delegate agencies’ policy may include attendance goals in Family Partnership agreements or attendance contracts between the program and the family.

PROCEDURE:

Denver Great Kids Head Start delegate agencies will support families to promote regular attendance. If necessary, conduct Head Start staff will conduct home visits, send letters, emails or make direct contact with the family when a child has multiple unexplained absences. Staff must make all efforts to re-engage families otherwise they shall consider the slot vacant.

On a monthly basis Denver Great Kids Head Start delegate agencies will report monthly attendance percentage and to all extent possible maintain attendance percentages at or above 85% and when attendance percentage falls below the required percentages. Delegate agencies must provide detailed explanation and strategies the program is taking to support better attendance. Delegate agencies must ensure any attendance barriers for homeless children are removed and that attendance supports for homeless children are provided.

In accordance with 45 CFR 1302.16 Delegate agencies must implement a process that ensures that children are safe when they do not arrive at school. If a child is unexpectedly absent and a parent has not contacted the program within one hour of program start time, the program must attempt to contact the parent to ensure the child’s well-being.
POLICY:

It is the policy of Denver Great Kids Head Start that staff of delegate agencies makes every effort to accommodate the needs of all enrolled families through problem solving and open communication. In accordance with the Head Start Performance Standards, Denver Great Kids Head Start reserves the right to address enrollment issues from the before/after program care related to specified circumstances. Delegate agencies must adopt, follow, and document policies and procedures to ensure this policy is met.

Enrollment in the before/after program option requires certain eligibility criteria to be met. When these criteria are no longer met by a family, they will receive a priority for a part-day option, six hours or home-based options if available and desired by the family.

Denver Great Kids Head Start and its delegate agencies cannot require that families have or apply for Child Care Assistance Program (CCAP) to enroll in Head Start. Therefore, a family’s participation in Head Start cannot be contingent upon their access to CCAP.

All Head Start delegate agencies must implement program practices, policies and comply with CRF 1302.18 Fees:

(a) Policy on fees. A program must not charge eligible families a fee to participate in Head Start, including special events such as field trips, and cannot in any way condition an eligible child’s enrollment or participation in the program upon the payment of a fee.

(b) Allowable fees. (1) A program must only accept a fee from families of enrolled children for services that are in addition to services funded by Head Start, such as child care before or after funded Head Start hours. A program may not condition a Head Start child’s enrollment on the ability to pay a fee for additional hours.

(2) In order to support programs serving children from diverse economic backgrounds or using multiple funding sources, a program may charge fees to private pay families and other non-Head Start enrolled families to the extent allowed by any other applicable federal, state or local funding sources.
Section 4.H. Home Visits

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start requires that each delegate agency makes every effort to work with families and children who frequently miss scheduled home visits, which are a requirement of the combination and home-based program options. Delegate agencies must adopt, follow, and document policies, procedures and practices to ensure that agency staff reaches out to families to resolve the problem and to declare a vacancy when those efforts do not resolve the problem.
Section 4.I. Transfers Between Denver Great Kids Head Start Delegates

Effective Date: 1/1/00                      Revision Date: 7/1/14                      Approval Date: 8/26/14

POLICY:

When a parent or guardian wants a child transferred to another Denver Great Kids Head Start center, the child will be considered for enrollment at the new center subject to availability according to established program selection, enrollment and eligibility guidelines of the delegate agency that manages the new center. Delegate agencies will adopt, follow, and document policies and procedures to ensure this policy is met and to ensure appropriate information is transferred with the child.

PROCEDURES:

1. During the enrollment process, family service workers and/or teachers will ask families if their child has already participated in one of Denver Great Kids Head Start’s other programs.
2. If the child has participated in another Denver Head Start program, the staff person will ask the family the reason for the transfer and record it.
3. Staff will not require a family who has had a child in another Denver Head Start program to fill out the full application unless all of the family’s information has changed.
4. Staff will inform the transferring family that the receiving agency will contact the sending delegate agency to request a transfer of the family’s records.
5. Staff will require transferring families to fill out a new emergency card.
6. For the Family Partnership Agreement process, staff will review the paperwork with families to see whether last years or this current year’s goals were met. Staff will ask about new goals and initiate a new or continuing Family Partnership Agreement.
7. Staff will orient transferring families to the new agency’s goals, philosophy, mission, vision, structure, curriculum, and governance process.
8. Staff will introduce the transferring families to the teachers, program options, other families, etc.
9. Staff will encourage involvement from the transferring families by:
   a) Finding out what type of activity families can participate in and when would be the best time for a family member to volunteer.
   b) Encouraging the family to perform a volunteer activity associated with their selected Head Start site.

When an income eligible child transfers from one Denver Great Kids Head Start delegate to another, the receiving delegate agency will not re-determine the child’s eligibility. Denver Great Kids Head Start delegate agencies will ensure that the transition from one Denver Great Kids Head Start delegate to another will be a simple process for income eligible families.
Section 4. J. Eligibility and Training on Head Start Eligibility and Treatment of Families

Effective Date: 7/01/15  Revision Date: N/A  Approval Date: 6/27/17

In accordance with federal regulation 1302.12(m) Denver Great Kids Head Start and its delegate agencies will provide training on eligibility to:

1. New Governing Body and Policy Council/Committee members within 180 days of the beginning of their term of service,
2. Management staff and staff members who make eligibility determinations within 90 days of their date of hire, and,
3. Have a policy on how often training will be provided after the initial training.

At a minimum, the training will include:

1. Methods on how to collect complete and accurate eligibility
2. Strategies for treating families with respect and dignity and for dealing with possible issues of domestic violence, stigma and privacy
3. Understanding of program’s policies and procedures that describe actions taken against staff and families, or participants who attempt to or intentionally provide false information

On a yearly basis, each Denver Great Kids Head Start delegate agency will provide updates on training dates, groups or staff trained, and content of training to the grantee office.
Section 5: School Readiness

A. Curriculum
B. Child Outcomes
C. Holiday Activities
D. Home Visits/Teacher Conference
E. Individualization
F. Mental Health
G. Special Needs
H. Transition from Early Head Start and Kindergarten
Section 5.A. Curriculum

Effective Date: 1/1/00       Revision Date: 2/23/17       Approval Date: 5/23/17

POLICY:

Each Denver Great Kids Head Start delegate agency will implement a developmentally appropriate research-based early childhood curricula with an assessment process that is aligned to the curriculum and includes experiences that support school readiness, in the domains of learning and development aligned with the Head Start Early Learning and Outcomes Framework: Language and Literacy, Cognition and General Knowledge, approaches to Learning, Physical Development and Health and Social/Emotional Development.

EXAMPLES OF PROCEDURES:

The adoption of the written curriculum must indicate:

1. Evidence of standardized training procedures and curriculum materials to support implementation.
2. Evidence of parent involvement in the selection, development, implementation and evaluation of the curriculum for each program option.
3. The curriculum designed for Head Start children should be composed of both concrete and abstract experiences that provides knowledge of themselves and the world around them. The curriculum must be flexible and child-centered and is designed to be a part of the total educational continuum, not a separate program.
4. The written curriculum includes goals for children’s development and learning and are content rich to promote measurable progress.
5. The curriculum process supports the inclusion of children with disabilities.
Section 5.B. Child Outcomes

Effective Date: 1/1/00        Revision Date: 2/23/17        Approval Date: 5/23/17

POLICY:

Denver Great Kids Head Start requires the systematic gathering of information to determine children’s level of development. Each delegate must ensure that the tools used to assess each child’s progress conform to sound early childhood practices. The developmental assessment must be child-centered, multi-dimensional and activity-centered to plan the daily programs of activities and to create a learning environment appropriate for each child. Examples of instrument used in Denver Great Kids Head Start program include: Teaching Strategies GOLD, Creative Curriculum Checklist, Montessori Checklist, Portfolio Assessment, teaching staff Observations, and Devereux Early Childhood Assessment (DECA).

1. REPORTS:

Denver Great Kids Head Start delegate agencies must adopt, follow and document policy and procedure to ensure that child outcome information is collected and analyzed three (3) times per year. Each program must have a record-keeping and reporting system to manage and generate reports which include the 5 Head Start pre-school domains and 14 domain elements. The three periods for outcome reports are fall, midpoint in the year and at the end of the year. Each DGKHS delegate agency will be reporting using TS Gold, which will facilitate greater uniformity in data reporting and analysis. On-going monitoring ensures a tracking pattern of progress and accomplishment for groups of children. The delegate agencies are responsible for using information to inform and adjust strategies to better support individualized learning and improve teaching practices.

2. DEVELOPMENTAL SCREENINGS POLICY:

Denver Great Kids Head Start delegate agencies must complete a developmental screening on each child enrolled in the program within 45 calendar days of the child’s entry date. Each agency must adopt, follow, and monitor procedures to ensure the confidentiality of each child’s records. At the time of enrollment, parent’s approval for screening must be obtained. Refer to 1302.33

3. SCREENING:

Delegates agencies must comply with Head Start performance standards related to developmental screening of children and assessment tools must be research-based. Examples include the Ages and Stages Questionnaire and the Early Screening Inventory- Revised. In addition to developmental screenings, delegates must complete additional screening related to social, emotional, and behavioral skills and solicit parental information about their child’s mental health.

4. ASSESSMENTS:

Delegate agencies must conduct standardized and structured assessments for each child that provide ongoing information to evaluate the child’s developmental level and progress.
Section 5.C. Holiday Activities

Effective Date: 1/1/00       Revision Date: 7/1/14  Approval Date: 8/26/14

**POLICY:**

Head Start delegate agencies should provide an environment that helps each child build ethnic pride, develop a positive self-concept, and enhance his or her individual strengths. Holiday activities should support this goal and respect the diversity of children enrolled in Head Start.

**EXAMPLES OF PROCEDURES:**

1. A delegate agency committee of staff and parents will develop guides for agency Head Start classroom activities related to holidays.
2. Activities will be planned around the children’s interests and abilities as outlined in the National Association for the Education of Young Children’s “Developmentally Appropriate Practices.”
3. Activities will, at all times, enhance the sense of dignity and self-worth within each child and family.
4. Parents and children must never be made to feel uncomfortable or unwelcome at any Head Start activity due to their religious or cultural beliefs or family background.
5. The staff must keep in mind at all times that the overall goal of Head Start is to bring about a greater degree of social competence and school readiness in children of low-income families. Holiday activities must be planned with these goals in mind. Each child in the classroom must be the priority.
6. Each year, families and staff will review and updated their Holiday and Celebrations Manual.

**SUGGESTED ACTIVITIES/CONCEPTS:**

<table>
<thead>
<tr>
<th>APPROPRIATE</th>
<th>APPROPRIATE</th>
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<tbody>
<tr>
<td>Classroom activities must be concrete. Example: Celebrate the &quot;universally shared&quot; meaning behind the holiday, such as sharing, harvest, and changing seasons.</td>
<td>Celebration of milestones in a child’s life. These milestones can include first tooth, first pet.</td>
</tr>
<tr>
<td>Focus on fall and changing of seasons for Halloween.</td>
<td>Craft activities that speak to a child’s culture and developmental milestones.</td>
</tr>
<tr>
<td>Focus on sharing and harvest for Thanksgiving. Plan a trip to the pumpkin patch for harvest.</td>
<td>Plan activities that fit with the goals of developmentally appropriate practices and promote school readiness.</td>
</tr>
<tr>
<td>Focus on lights, peace, winter, and sense of community in December.</td>
<td>Plan a unit on eggs, re-birth and the coming of spring for Easter.</td>
</tr>
<tr>
<td>Host a children’s art show with all “original” open-ended artwork for any holiday.</td>
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CELEBRATIONS:

POLICY:

Denver Great Kids Head Start delegate agencies shall provide an environment that helps each child promote a positive self-concept which emphasizes his or her individual strength which respect the diverse backgrounds of all Head Start students.

EXAMPLES:

1. Classroom activities must be concrete. Example: Celebrate the “universally shared” meaning behind the occasion, such as sharing, harvest, and changing seasons.
2. A child centered act such as making books about their Head Start experiences.
3. Host a children’s art show with all original open-ended artwork.
4. Focus on lights, peace, winter, and sense of community in December.

END OF YEAR:

EXAMPLES OF APPROPRIATE AND INAPPROPRIATE END OF YEAR ACTIVITIES:

APPROPRIATE:

1. An open house where children share their favorite artwork and constructions.
2. A class picnic where children invite their parent to join them for lunch.
3. A “tea” for which the children have helped prepare and serve nutritious snacks such as veggies and dip.
4. Children make “books” about their experiences at Head Start.
5. A puppet show or storyteller provides entertainment that can be enjoyed by children and adults.

INAPPROPRIATE:

1. A graduation ceremony with caps and gowns.
Section 5.D. Home Visits/Teacher Conferences

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

**POLICY:**

Denver Great Kids Head Start and the Head Start Program Performance Standards mandate two home-visits per year by teaching staff to each family enrolled in Head Start classes. Each delegate agency must adopt, follow, and document policies and procedures that ensure these mandatory visits occur and that the visits support the goals of the Denver Great Kids Head Start program.

1. Objectives for the home visit:

   a) To improve communication between parents and program staff.
   b) To provide materials and experiences for parents because they are the most important teachers of their children.
   c) To share areas of mutual concern and common interests and to develop plans of action.
   d) To provide information about child development, health, school, and referral sources.
   e) To foster positive interactions between parent and child.
   f) To provide an opportunity for the parent to help set the child’s educational program at home and in the classroom.

Denver Great Kids Head Start delegate agencies must adopt, follow and document policies and procedures to ensure that conferences are held between teachers and either parents or guardians to discuss each child’s progress in Head Start, as required by the Head Start Program Performance Standards.

**TEACHER CONFERENCES:**

These meetings differ from home visits, which should build relationships and communication between teachers and the family to support the child’s school success. Conferences are designed to discuss specific progress, goals and other information about the child to help both the school and the family support the child’s healthy development and school readiness. Records should be maintained on each child and the result of the conference.
Section 5.E. Individualization

Effective Date: 1/1/00       Revision Date: 7/1/14       Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start delegate agencies and vendors shall adopt, follow, and document policies and procedures to ensure that the educational, social, emotional, and cognitive developmental needs of each child enrolled in the program are used to:

EXAMPLES:

1. Design daily lesson plans
2. Agency curriculum and enrichment experiments
3. Child specific classroom management strategies
4. Staff development activities

LESSON PLANS:

Denver Great Kids Head Start delegate agencies will ensure that all Head Start teaching staff is provided with training and resources in order to develop effective and developmentally appropriate instructional plans. The lesson plans should include activities that foster development of cognitive development, social, emotional development, physical and motor skills, health and nutrition development. Education Administrator in conjunction with Education Coordinator provides ongoing monitoring.
Section 5.F. Mental Health

Effective Date: 1/1/00       Revision Date: 7/1/14       Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start contracts with a team of licensed clinical social workers from Denver Health to support delegates with the social/emotional development of Head Start students. Denver Health’s team of mental health consultants provide Head Start children, families and staff with one on one support, universal consultation, education and training. The mental health consultant’s work in collaboration with mental health staff from delegate agencies to ensure that mental health services and social-emotional support are coordinated, based on best practice, and are culturally and linguistically responsive to the needs of Head Start children and their families.
Section 5.G. Special Needs

Effective Date: 1/1/00       Revision Date: 7/1/14       Approval Date: 8/26/14

**POLICY:**

Children with identified disabilities in Denver Great Kids Head Start must have an Individualized Education Plan developed in a collaboration of the Local Education Agency, disability staff, general education staff, parents, and mental health staff, as appropriate.

Denver Great Kids Head Start serves children with special needs using a transdisciplinary approach that aims to address the unique needs of children in the general classroom. Service is integrated, and interagency communication is facilitated through the collaborative service plan and coaching model of service delivery.

Denver Great Kids Head Start delegates and vendors play a key role in this design and are expected to support the individual education plans and transdisciplinary service delivery, as needed by any of the children enrolled in Denver Great Kids Head Start programs. For additional guidance refer to the current Disabilities Services Plan.
PROCEDURE:

Each Delegate must establish and maintain procedures to support successful transitions for enrolled children and families from Early Head Start to Head Start and from Head Start into elementary school.

1. Every effort will be made to facilitate children’s transition from Head Start to kindergarten and to make this a smooth experience.

2. Teachers will encourage parent participation in kindergarten orientation session and “open house” programs provided by public school. Parents of children with disabilities will be made aware of and encouraged to attend orientation sessions designed specifically for parent of children with disabilities.

3. Coordinating with the schools or other agencies to ensure that individual Early Head Start or Head Start children’s relevant records are transferred to the school or next placement in which a child will enroll.

4. Outreach to encourage communication between Early Head Start or Head Start staff and their counterparts in the schools and other child care settings including principals, teachers, social worker and health staff to facilitate continuity of programming.

5. Grantee will collaborate with the school district to ensure delegates and their families receive information on the school choice process in a timely manner.

6. Ensure that all programs receive information and resources to support kindergarten transition
Section 6: Health

A. Denver Great Kids Head Start Health Manual
B. Field Trip Illness or Accidents
C. Nutrition-Meeting Children’s Needs
D. Food Safety and Sanitation of Donated Foods
E. Food Safety and Sanitation of Leftover Food
F. Food Service, CACFP Records of Meals and Attendance
G. Food Safety, Sanitation, and Hair Restraints
H. Smoke Free Environment
POLICY:

Denver Great Kids Head Start Health Manual is the standard for health-related policies and procedures in Denver Great Kids Head Start. Delegate agencies and vendors should adopt, follow, and document policies that require staff to reference for guidance on health policy and procedures. Additional policies on health-related matters are contained in this manual and also must be followed. Background and Procedure:

1. The Health Manual was developed by Denver Health and Hospital Authority staff with input and editing from the Denver Great Kids Head Start Health Services Advisory Committee (HSAC), delegate agency nursing staff and Head Start disabilities and nutrition vendors. The policies and procedures have been approved by the HSAC.

2. The Health Manual is reviewed annually by the HSAC to ensure consistency with the Health and Dental Focus Plans, Head Start Performance Standards, and current medical standards of practice.

3. Delegate agencies should adopt policies that are consistent with the Health Manual policies and procedures.

4. Delegate agencies are encouraged to train staff in use of the Health Manual which provides guidance and training on health policies and procedures.

CURRENT ADOPTED HEALTH RELATED POLICIES AND PROCEDURES:

1. CHILD ABUSE POLICY: SUSPECTED ABUSE BY AN EMPLOYEE
2. CHILD ABUSE POLICY: SUSPECTED ABUSE BY PARENT/GUARDIAN
3. CHILD ABUSE: MANDATORY REPORTING STEP BY STEP GUIDE
4. CONDITIONS WHICH REQUIRE NURSES’ ATTENTION
5. DISEASE PREVENTION/HYGIENE
6. DISPENSING OF MEDICATIONS BY NON-MEDICAL PERSONNEL
7. HEALTH CARE ACTION PLAN DEVELOPMENT: RESPONDING TO SIGNIFICANT HEALTH CONDITIONS
8. HEALTH EMERGENCY PROCEDURES
9. IDENTIFICATION OF PRIMARY HEALTH CARE SOURCE: MEDICAID/COLORADO CHILD HEALTH PLAN PLUS REFERRAL PROCESS
10. IMMUNIZATIONS/PHYSICAL AND DENTAL EXAMINATIONS
11. INCIDENT/ACCIDENT RESPONSE AND REPORTING
12. INCLUSION/EXCLUSION – MANAGEMENT AND PREVENTION OF ILLNESS
13. INJURY PREVENTION
14. MEDICAL REFERRALS FOR ILLNESS OR INJURIES
15. NUTRITION RELATED HEALTH CONCERNS
16. SMOKE FREE ENVIRONMENT
Section 6.B. Field Trip Illness or Accidents

Effective Date: 1/1/00      Revision Date: 7/1/14      Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start requires agencies that take children on field trips and other excursions to adopt, follow, and document policies and procedures that ensure child safety in the event of an illness or accident.

PROCEDURE:

Delegate agencies shall develop policies and procedures to ensure that staff:

1. Have emergency contact information and authorized pick-up information with them for each child on a field trip.
2. If a child has a Health Care Action Plan that includes medications, have emergency medications and staff available who have been trained in medication administration and have received delegation by a registered nurse.
3. Have appropriate first aid supplies available to respond to an accident or injury using appropriate personal protective equipment and standard precautions if dealing with bodily fluids.
4. Follow licensing guidelines including using parent permission slips for each field trip.
Section 6.C. Nutrition-Meeting Children’s Needs

Effective Date: 2/4/04        Revision Date: 5/8/17        Approval Date: 6/27/17

POLICY:

Denver Great Kids Head Start supports the Head Start Performance Standard that states that the delegate agency must design and implement a nutrition program that meets the nutritional needs and feeding requirements of each child, including those with special dietary needs and children with disabilities (Performance Standard 1302.44). In addition, DGKHS monitors food programs to ensure alignment with the Child and Adult Care Food Program and best practices that promote school readiness and healthy outcomes. Therefore, all Denver Great Kids Head Start delegate agencies must adopt, use, and document policies, procedures, and training materials to ensure that minimum standards are met, as well as standards set by the Colorado Department of Health and the USDA Child and Adult Care Food Program.

Policies and procedures will ensure:

1. Delegate participation in the Child and Adult Care Food Program
2. Nutritional needs for children are met through the use of cycle menus
3. Delegates develop and follow meal and snack policies that align with those in this manual
4. Child and Adult Care Food Program (CACFP) meal patterns are followed at all meals and snacks
5. Following sanitation practices as outlined by the Colorado Department of Public Health and Environment
6. Child and Adult Care Food Program minimum portion sizes are offered at each meal and snack
7. Children have enough time to eat
8. Second helpings or additional servings of another food are always available to children
9. Individual nutritional and dietary needs are met, including for those children with special needs and disabilities
10. Accommodating special diet and maintaining special diet statements, including those for children with special needs or disabilities
11. Children have sufficient time to eat
12. Breakfast is offered to children who have not eaten
13. Family style dining during mealtime
14. Cycle menus reflect a wide variety of foods and meet the Dietary Guidelines for Americans as outlined by choosemyplate.gov
15. Cycle menus and general nutritional information and resources are provided to families
16. Offering opportunities for children to participate in food preparation and related activities to contribute to socialization, broaden food experiences and integrate nutrition into program activities
17. Food is not used as a reward or punishment
18. Dental health needs are met
19. Assessment of nutritional needs is provided as well as ongoing counseling
20. Offering a variety of food to broaden the child’s food experience

Promoting Positive Nutritional Habits through a Positive Experience
Children should be offered all foods and encouraged in a friendly, non-directive manner to take a serving and try the food. Children should never be forced to take or eat a food they do not want and children should never be encouraged to eat more of a food than they want.

Purpose of Cycle Menus
Cycle menus are designed to offer the children a variety of different foods and introduce new foods to offer the children the best possible nutrition and foster good eating habits. Serving leftover foods at another meal or snack decreases the variety of foods the children are offered throughout the week. Delegate agencies are encouraged to exceed these standards and to use food and nutrition as part of the education program for children, families, and staff. Food and cooking are excellent tools for socialization, pre-math, early science, pre-reading, and oral language development activities.

See the Head Start Program Performance Standards for a complete list.
Section 6.D. Food Safety and Sanitation Donated Food

Effective Date: 2/4/04          Revision Date: 7/1/14          Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start supports nutritional best practices and the Head Start Performance Standard of compliance with all Federal, State and local food safety and sanitation laws including those related to the storage, preparation and service of food and the health of food handlers. In addition, agencies must contract only with food service vendors that are licensed in accordance with state, Tribal or local laws (Performance Standard 1304.23).

Therefore, Denver Great Kids Head Start Delegate Agencies will develop, adopt, follow and document policies and procedures for donated food. These include:

1. Food is handled in a way that assures food safety for the children and is handled in accordance with the Colorado Department of Public Health and Environment and Colorado Childcare Licensing standards.

2. Families are not placed at a disadvantage if they cannot donate foods to the classroom.

3. Delegate Agencies may adopt a policy that forbids donated food or food provided by parents or guardians or family members in the classroom.

4. Families are informed of policies related to food’s donated in the agency’s parent handbook and throughout the year.

5. Donated food may only be used as part of the meal or snack requirements for meals claimed for meal reimbursement on the Child and Adult Care Food Program if a donation receipt containing the quantity received, date, name address and phone number of the individual donating the food is maintained on file.

6. Donated foods offered to children cannot compete with meal requirements on the Child and Adult Care Food Program.
Section 6.E. Food Safety and Sanitation of Leftover Food

Effective Date: 2/4/04            Revision Date: 7/1/14            Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start supports the Head Start Performance Standard of compliance with all Federal, State and local food safety and sanitation laws including those related to the storage, preparation and service of food and the health of food handlers. (Performance Standard 1304.23). Leftover foods from a meal or snack must be handled carefully to assure they will be safe to feed children at another time. Denver Great Kids Head Start Delegate Agencies will develop, adopt, follow and document policies and procedures regarding what can be done with leftover food. Delegate agencies may adopt a policy that all leftover food is discarded. If leftover food is to be used at a later time a policy that meets Federal, State and local sanitation laws and will include the following:

1. Based on Colorado Department of Public Health policies food that has been on the table cannot be re-served

2. If an amount of food in excess of the minimum portion size of food for the Child and Adult Care Food Program is purchased and the excess food is not brought to the table, the excess food may be re-used if it was handled in a safe and sanitary manner
   a) Based on the above situation what type of leftover food can be offered to the children at another time
   b) Directors and staff will want to monitor the use of leftover food to assure that the use of leftover food does not limit the variety of food offered to children.

3. Head Start staff may never, under any circumstances, take food home

4. Foods requiring refrigeration that have been on the table or un-refrigerated for more than two hours are not safe to cool and reheat to serve to children and should be thrown out.

5. Based on the CDPHE-CACFP Procedure Memo #12-03 “program food not consumed may be donated to eligible local food banks or charitable organizations. The amendment defines the term “eligible local food banks or charitable organizations” to mean any food bank or charitable organization which is exempt from tax under section 501 (c) (3) of the Internal Revenue code of 1986…” Please see the memo for full details.
Section 6.F. Food Service, CACFP Requirements, Record of Meals and Attendance

Effective Date: 2/4/04  Revision Date: 7/1/14  Approval Date: 8/26/14

RECORD OF MEALS AND ATTENDANCE:

Denver Great Kids Head Start supports the Head Start Performance Standard that states all Head Start grantees and delegate agencies must use funds from USDA Food and Consumer Services Child Nutrition Programs as the primary source of payment for meal services. (Performance Standard 1302.44 (b).

Therefore, Denver Great Kids Head Start Delegate Agencies will develop, adopt, follow and document policies and procedures to ensure that Child Nutrition Program requirements are followed.

EXAMPLES OF PROCEDURES FOR RECORD OF MEALS COMPLETION:

1. Record of Meal rosters listing children’s first and last names are available at the time of the meal service, so meals offered can be accurately recorded by visually observing children offered the meal.

2. Systems must be in place to allow newly enrolled children to be added to the Record of Meal rosters.

3. A separate attendance record is maintained.

4. The classroom or cafeteria staff is trained and monitored to assure the Record of Meals is recorded at the time of the meal service for children who are physically offered the meal or snack.

5. A backup system should be in place to assure the Record of Meals is completed daily even if the usual staff person is absent or has other responsibilities.
Section 6.G. Food Safety, Sanitation, and Hair Restraints

Effective Date: 9/1/06            Revision Date: 7/1/14            Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start supports the Head Start Performance Standard of compliance with all Federal, State and local food safety and sanitation laws including those related to food handling. (Performance Standard 1304.23). Therefore, Denver Great Kids Head Start Delegate Agencies will develop, adopt, follow and document policies and procedures to ensure that all food is handled in a way that assures food safety for the children and is handled in accordance with the Colorado Department of Public Health and Environment and Colorado Childcare Licensing standards as it relates to Hair Restraints.

The Colorado Consumer Protection for retail requires the following practices are followed:

1. Except as provided under paragraph B of this section, employees engaged in food preparation shall wear hair restraints, such as hats, hair coverings, nets or other effective means to effectively keep hair from contacting exposed food, clean equipment, utensils, and linens, and unwrapped single-serving or single-use articles.

2. This section does not apply to employees such as counter staff members who serve only beverages and wrapped or packaged foods, or hostesses and wait staff who present a minimal risk of contaminating exposed foods, clean equipment, utensils, and linens, and unwrapped singe-service and single-use articles.
Section 6.H. Smoke Free Environment

Effective Date: 5/27/08  Revision Date: 7/1/14  Approval Date: 8/26/14

BACKGROUND:

Head Start health services focus is on prevention and early intervention. Head Start programs work closely with parents to ensure that children are up-to-date on a schedule of age appropriate preventive and primary health care, as well as help parents obtain the necessary medical services for children who have reoccurring health conditions. The Head Start Program Information Report (PIR) shows asthma is one of the most frequently reported chronic health condition by Head Start programs. DGKHS and Delegates will work with Denver Public Health, the American Lung Association, other community agencies and organizations: to identify and provide intervention programs; to increase awareness of effective reduction of children’s exposure to secondhand smoke; and encourage parents to take action to reduce exposures:

1. As part of this effort, Denver Great Kids Head Start delegate agencies will include in their intake documents at least one question to determine the secondhand smoke exposure status of the children whose care is entrusted to them. (i.e. Does anyone who lives or spends a lot of time with the child smoke inside the house or auto? (No or Yes)
   a) If the answer is yes, the staff will in a sensitive manner address the issue with the family, provide them with appropriate materials such as the ONE Step program kits. The Health Services Coordinator/Staff Nurse or other appropriate Head Start staff will incorporate second hand smoke considerations into their assessments of chronic illnesses that may be linked to exposure.

2. Family Services staff will ask the families if they would like to address secondhand smoke issues when discussing Family Partnership Agreements and document this effort via case note, checklist or other appropriate documentation.

3. Health and Family Services staff will have available resources such as the Colorado QuitLine brochures in order to be able to quickly refer tobacco users to success cessation programs upon request. Protecting Children from Secondhand Smoke Training for Child Care Providers and Head Start Staff is available through Denver Public Health at 303-436-8211 or other local health agencies.
Section 7: Safety

A. Suspected Child Abuse by Parent or Guardian, Mandated Reporting
B. Suspected Child Abuse by Employee
C. Notification Policy
E. Emergencies- Fire, and Disaster Preparedness Hazardous Materials
F. Sign-in / Sign-out
Section 7.A. Suspected Child Abuse By Parent or Guardian, Mandated Reporting

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Head Start staff must follow the mandated reporting requirements to report to the Denver Department of Human Services or local law enforcement agency any incident of suspected child abuse/neglect or sexual abuse by a parent/guardian.

COLORADO CHILDREN’S CODE: 19-1-103

1. (a) "Abuse" or "child abuse or neglect", as used in part 3 of article 3 of this title, means an act or omission in one of the following categories that threatens the health or welfare of a child:

2. Any case in which a child exhibits evidence of skin bruising, bleeding, malnutrition, failure to thrive, burns, fracture of any bone, subdural hematoma, soft tissue swelling, or death and either:

3. Any case in which a child is subjected to unlawful sexual behavior as defined in;

4. Any case in which a child is a child in need of services because the child's parents, legal guardian, or custodian fails to take the same actions to provide adequate food, clothing, shelter, medical care, or supervision that a prudent parent would take. The requirements of this subparagraph (III) shall be subject to the provisions of section 19-3-103.

5. Any case in which a child is subjected to emotional abuse. As used in this subparagraph (IV), "emotional abuse" means an identifiable and substantial impairment of the child's intellectual or psychological functioning or development or a substantial risk of impairment of the child's intellectual or psychological functioning or development.

6. Any act or omission described in section 19-3-102(1)(a), (1)(b), or (1)(c);

7. Any case in which, in the presence of a child, or on the premises where a child is found, or where a child resides, a controlled substance, as defined in section 18-18-102(5), C.R.S., is manufactured or attempted to be manufactured;

8. Any case in which a child tests positive at birth for either a schedule-I controlled substance, as defined in section 18-18-203, C.R.S., or a schedule-II controlled substance, as defined in section 18-18-204, C.R.S., unless the child tests positive for a schedule-II controlled substance as a result of the mother’s lawful intake of such substance as prescribed.

PROCEDURES:

1. When a Head Start staff has reasonable concern over the safety of a child, including concerns with marks, bruises on a child, the staff person is to immediately contact the Denver Department of Human Services (DDHS) Crisis Hotline or local law enforcement agency. The Head Start staff will contact the designated administrative staff in the individual agency to inform them of the reporting according to delegate specific procedures.
2. The Denver Department of Human Services will receive the report through the Hotline and determine the course of the investigation.

3. The Denver Department of Human Services will conduct the investigation in accordance with Department policy and procedure.

4. The Denver Department of Human Services has the authority to conduct the investigation and plan for the safety of the child. The Denver Department of Human Services may decide to include the Denver Police Department.

5. Denver Head Start delegate agency staff will cooperate, giving any information needed for the Denver Department of Human Services staff and the Denver Police Department to assure the safety of the child.

Information: DDHS Crisis Hotline, as of 1/21/14: 720-944-3000.
Section 7.B. Suspected Child Abuse by Employee

Effective Date: 1/1/00      Revision Date: 7/1/14      Approval Date: 8/26/14

POLICY:

Head Start staff must follow the mandated reporting requirements to report to the Denver Department of Human Services any incident of suspected child abuse/neglect or sexual abuse by an employee.

COLORADO CHILDREN’S CODE: 19-1-103

1. "Abuse" or "child abuse or neglect", as used in part 3 of article 3 of this title, means an act or omission in one of the following categories that threatens the health or welfare of a child:

2. Any case in which a child exhibits evidence of skin bruising, bleeding, malnutrition, failure to thrive, burns, fracture of any bone, subdural hematoma, soft tissue swelling, or death and either: Such condition or death is not justifiably explained; the history given concerning such condition is at variance with the degree or type of such condition or death; or the circumstances indicate that such condition may not be the product of an accidental occurrence;

3. Any case in which a child is subjected to unlawful sexual behavior as defined in section 16-22-102(9), C.R.S.;

4. Any case in which a child is a child in need of services because the child's parents, legal guardian, or custodian fails to take the same actions to provide adequate food, clothing, shelter, medical care, or supervision that a prudent parent would take. The requirements of this subparagraph (III) shall be subject to the provisions of section 19-3-103.

5. Any case in which a child is subjected to emotional abuse. As used in this subparagraph (IV), "emotional abuse" means an identifiable and substantial impairment of the child's intellectual or psychological functioning or development or a substantial risk of impairment of the child's intellectual or psychological functioning or development.

6. Any act or omission described in section 19-3-102(1)(a), (1)(b), or (1)(c);

7. Any case in which, in the presence of a child, or on the premises where a child is found, or where a child resides, a controlled substance, as defined in section 18-18-102, C.R.S., is manufactured or attempted to be manufactured;

8. Any case in which a child tests positive at birth for either a schedule-I controlled substance, as defined in section 18-18-203, C.R.S., or a schedule-II controlled substance, as defined in section 18-18-204, C.R.S., unless the child tests positive for a schedule-II controlled substance as a result of the mother's lawful intake of such substance as prescribed.

PROCEDURES:

1. When a Head Start staff has reasonable concern over the safety of a child, including concerns with marks, bruises on a child, the staff person is to immediately contact the Denver Department of Human Services (DDHS) Crisis Hotline or local law enforcement agency. The Head Start staff will contact the designated administrative staff in the individual agency to inform them of the reporting according to delegate specific procedures.
2. The Denver Department of Human Services will receive the report through the Hotline and determine the course of the investigation.

3. The Denver Department of Human Services or local law enforcement agency will conduct the investigation in accordance with Department policy and procedure.

4. The Denver Department of Human Services has the authority to conduct the investigation and plan for the safety of the child. The Denver Department of Human Services may decide to include the Denver Police Department.

5. Denver Head Start delegate agency staff will cooperate, giving any information needed for the Denver Department of Human Services staff and the Denver Police Department to assure the safety of the child.

Information: DDHS Crisis Hotline, as of 1/21/14: 720-944-3000
Section 7.C. Notification Policy

Effective Date: 3/17/04  Revision Date: 7/1/15  Approval Date: 06/23/15

POLICY:

Denver Great Kids Head Start Notification Policy:

In addition to reporting to the Denver Department of Human Services or local law enforcement agency, the Delegate Head Start Director or designee will notify the Denver Great Kids Head Start Executive Director in cases of suspected child abuse or neglect by a parent or guardian, suspected institutional abuse by a staff member, any significant incidents including major injury or death of a child or staff, and any other emergency situations including program and/or center closures.

PROCEDURE:

1. CHILD ABUSE/NEGLECT REPORTING POLICY:

   a) Head Start staff must follow the legal requirements to report to the appropriate Department of Human Services or local law enforcement agency any incident of suspected child abuse or neglect.

   b) If a Delegate staff member makes a child welfare referral regarding a parent or guardian, the Delegate Head Start Director or designee will notify by phone call or email the Denver Great Kids Head Start Executive Director or designee within 48 HOURS of the report.

   c) If an incident of institutional abuse is reported at the Delegate Agency, the Delegate Head Start Director or designee will notify by phone call or email the Denver Great Kids Head Start Executive Director or designee within 48 hours of the report. The notification will not include confidential information about the individuals.

   d) Delegate staff may consult the Denver Great Kids Head Start staff as a resource to discuss any concerns regarding child abuse/neglect reporting.

   e) The Delegate Head Start Director or designee will provide the number of child welfare referrals made per classroom on the monthly enrollment and attendance report collected by the Denver Great Kids Head Start Family Services Director.

   f) Each Delegate Agency will provide training at orientation, annually and on-going to Delegate staff on the Colorado Children’s Code and on the Delegate’s Child Abuse/Neglect Reporting Policy. Denver Great Kids Head Start may be used as an additional resource for this training.

2. INCIDENT REPORTING:

   a) In cases of major injury or death to a child or staff member during the Delegates’ hours of operation or any other significant incident, the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director or designee immediately.

   b) In cases were significant injury to a child or staff member results in calling 911, emergency transportation, or hospitalization, the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director or designee immediately.
c) In cases where a Delegate Agency reported suspected abuse or neglect to Denver Human services, the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director within 72 hours.

d) In cases of center closure due to facilities issues, the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director or designee immediately.

e) In cases of center closure due to weather (other than when Denver Public Schools close), the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director or designee immediately.

f) In cases when a child has been released to an unauthorized adult or left unsupervised during the delegate agency’s hours of operation, the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director or designee immediately.

g) In cases when staff members are disciplined for using methods other than positive child guidance, or for participating in practices that are emotionally damaging, physically harmful, disrespectful, degrading, dangerous, exploitative, or intimidating to children, the Delegate Head Start Director or designee must notify the Denver Great Kids Head Start Executive Director or designee immediately.
Section 7.D. Safety- Visitors, Late Child Pickup, Lost Children, Unsupervised Children, Intruders

Effective Date: 1/1/00       Revision Date: 7/1/15       Approval Date: 6/23/15

VISITORS:

Denver Great Kids Head Start Delegate Agencies will monitor all visitors to centers and classrooms to ensure the safety of children and staff. Delegate agencies will maintain a Visitor Log at each center and require its use by all visitors. Delegate agencies will adopt, follow, and document policies and procedures to ensure this policy is met.

EXAMPLES OF PROCEDURES:

1. All adults entering the center who are not staff members and are not parents who regularly pick-up children must show a picture ID to center staff and must sign the Visitor Log.

2. Staff members in the center must request that visitors sign the Visitor Log and do not release the child until the log has been signed ID information collected and parent/guardian authorization has been confirmed.

3. The logs will be kept on file.

1. LATE CHILD PICKUP:

It is Denver Great Kids Head Start’s policy that parents and guardians be responsible for prompt pick-up of their child at the end of his or her Head Start class. When a child is not picked up, staff are to follow Delegate Agency specific policies and procedures to assure the safe, continuous care of the child. Teachers and family services workers each have responsibilities when a child is left at Head Start after the usual pick-up time. Delegate agencies must adopt, follow, and document policies and procedures to implement policies and procedures to assure the safety of children. These policies should be stated in the parent handbook.

2. LOST CHILDREN:

Denver Great Kids Head Start program provides for the safety and supervision of all children enrolled in the program at all times. All Delegate Agencies must adopt, follow, and document policies, procedures, and practices to ensure the safety and supervision of children who are enrolled while the children are in their care. In the rare event that a child is lost, each Delegate Agency must have in place policies and procedures on the actions to be taken. When a child has been lost, the staff disciplinary action that follows will be determined based on each specific situation. All incidents involving lost children must be reported to local authorities in accordance with licensing requirements and to the Denver GreatKids Head Start Director within 24 hours.

3. UNSUPERVISED CHILDREN:

All Denver Great Kids Head Start delegate and vendor agencies must ensure that all staff, consultants, and volunteers abide by the program’s standards of conduct with regard to safe learning
environments and supervision. All agencies must adopt, follow, and document policies, procedures, and practices to ensure there are clear systems in place to account for the whereabouts of each child (e.g., attendance logs, sign-in/out sheets, and routine head counts). Delegate agencies will have redundant policies and procedures in place, and internal mechanisms for communication to ensure the safety of children. Additionally, outdoor environments are to be arranged so adults can see children and effectively supervise to prevent children from leaving and/or getting into unsafe areas.

**EXAMPLES OF PROCEDURES:**

1. The teacher is responsible for all children in the class; therefore, he or she must know where each child is at all times.

2. Any time an authorized adult, such as nurse, family services worker, or disabilities staff takes a child out of the classroom, the teacher must be notified. An adult must stay with the child at all times.

1. **INTRUDERS:**

Each Head Start Delegate Agency will adopt, follow, and evaluate policies and procedures to ensure the safety of staff and children in the event of an intruder in the building or of a visitor, whether parent or other person, who becomes threatening, or in the event of other emergencies such as a bomb threat or hostage-taking. Each Delegate Agency will adopt a training plan to provide regular training to staff on these policies and procedures and will include this information in staff manuals and orientation materials for new staff.
Section 7.E. Emergencies- Fire, and Disaster Preparedness

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

**FIRE DRILLS:**

Denver Great Kids Head Start Delegate Agencies should consult Caring for Our Children Basics when reviewing policies and procedures. Delegate agencies must train staff at pre-service, prior to working with children. Agencies must install all required fire safety equipment and must complete and document fire drills once each month, according to the standards of the Uniform Fire Code (UFC) and Denver Fire Code. Emergency information must be posted according to UFC standards, child care licensing, and Head Start standards.

**EXAMPLES OF PROCEDURES:**

1. All centers must have a fire detection system, which should never be turned off or inoperable.
2. All staff are responsible for maintaining the center in a fire prevention mode.
3. **ALL** staff are responsible to see that **ALL** children are safely out of the building in an emergency situation. To prepare for this emergency, every staff member must know all of the following:
   a) Exits;
   b) Direct access to exits;
   c) Location and operation of fire extinguishers and fire boxes; and - current inspection tag.
   d) Fire drill instructions.
4. Centers and classrooms must have posted evacuation routes.
5. Fire drills must be regularly completed, and a record of these drills must be kept.

**EMERGENCY MANAGEMENT AND DISASTER PREPAREDNESS RESPONSE PLAN:**

All Delegate Agencies will consult Caring for Our Children Basics when developing/reviewing policies and procedures. A program will implement a system of management, including training, oversight, correction and continuous improvement to ensure that all appropriate measures are taken to protect children in the event of an emergency. Training for staff will be at pre-service, prior to working with children. Emergencies defined as, at a minimum: Fire prevention, protection from contagious disease, special health concerns for children, and disaster preparedness. Disaster preparedness plans will include all-hazards management plans for more and less likely events. (1302.47, 7-8) When applicable plans will be posted. Each Denver Great Kids Head Start Delegate Agency will have documented policies and procedures to ensure the safety of children and parents in inclement weather, including snow.

The Denver Great Kids Head Start Executive Director or designee must be notified when any Delegate Agency makes the decision to close and must be given the reasons for the decision.
Section 7.F. Facilities Minimum Operational Standards

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

**LICENSING OF SITE LOCATIONS:**

Delegate Agencies shall obtain and maintain any and all required and appropriate licenses to operate Head Start programs. All site locations funded by Head Start shall have licenses in place, prior to opening each site location and all locations will have the required and appropriate licenses. In addition, each Delegate Agency will secure, post and maintain copies of current health inspection reports for each kitchen facility utilized in the preparation of food for each Head Start location. If Delegate Agencies’ health clearance or license is revoked, suspended or modified, Delegate Agencies will give immediate written notice to the Denver Great Kids Head Start Executive Director. Denver Great Kids Head Start will assist Delegate Agencies with addressing issues or concerns. Caring for Our Children Basics will also be consulted. If Delegate Agencies receive any order, direction, notice or other communication concerning the licensing of any location, Delegate Agencies will take appropriate action required to maintain all licenses in good standing. Delegate Agencies will provide copies to the Denver Great Kids Head Start Director of all such orders, reports, direction, notices or communications within twenty-four (24) hours. Denver Great Kids Head Start may suspend program operations if children’s health, safety or well-being are at issue.

*Minimum Operational Standards (1302.47 (b) 1)*

When children are present, Denver Great Kids Head Start Delegate Agencies must operate centers that always have running water, heat capable of warming the building to 70 degrees, electricity, working sewers, and working toilets.

Denver Great Kids Head Start Delegate Agencies will adopt, use and document policies and procedures to check daily before classes to assure minimum standards in this policy are met and to notify families in case of emergency closings when these standards cannot be met.

The Denver Great Kids Head Start Executive Director must be notified immediately when a Delegate Agency decides to close and must be given the reasons for the decision.

**PLAYGROUND SAFETY:**

Denver Great Kids Head Start requires that each Delegate Agency adopt, follow, and document policies, procedures, and practices to ensure the health and safety of children on the playground.
Section 7.G. Hazardous Materials

Effective Date: 1/1/00        Revision Date: 7/1/14        Approval Date: 8/26/14

**POLICY:**

Denver Great Kids Head Start requires that each Delegate Agency adopt, train, follow and document policies, procedures and practices to ensure that children are protected from hazardous materials including protection from blood borne pathogens. Staff will be trained at Pre-service, prior to working with children, in accordance with Colorado Office of Early Childhood.

**PROCEDURES:**

Delegate Agencies should develop procedures to ensure that:

1. Hazardous materials stored in the facility are placed in appropriately secured locations and are inaccessible to children.
2. Blood or blood tinged bodily fluids are collected using appropriate personal protective equipment and standard precautions and that blood tinged items (gauze, paper towels, etc.) are double bagged and disposed of in a manner which prevents children from being exposed.
3. In the rare instance of a substantial exposure (e.g., a large, heavily bleeding wound), blood tinged items should be collected, double bagged, and given to the delegate agency nurse. The nurse will arrange for the items to be transferred to Denver Health for appropriate hazardous waste disposal.

References: Denver Head Start Health Manual, Policies and Procedures Disease Prevention, Hygiene
Section 7.H. Sign- In/ Sign- Out

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

**POLICY:**

Delegate Agency staff must track the time when a child has entered Head Start's care and when the child has been released to a parent or a guardian. Delegate Agencies' will have policies and procedures to ensure that this occurs. Denver Great Kids Head Start Delegate Agencies shall also adopt, follow, and document policies, procedures, and training to ensure that children are always picked up by an authorized person at an authorized time and place.

**EXAMPLES OF PROCEDURES:**

When parents or guardians bring their children to class, they are responsible for signing them in on the “Sign-in/Sign-out” sheet provided by the center staff. Parents list the child’s name, time of arrival, and sign their name.

1. When parents or guardians return to pick up their children, they sign the child out using the same “Sign-in/Sign-out” form and record the time of departure. No one may sign out a child unless that person’s name is listed on the “Permission/Emergencies” form in the child’s file.
   a) The names listed on the “Permission/Emergencies” form in each child’s file must match the list of names on the emergency cards carried by the teaching staff when on a class field trip.
2. If staff does not recognize the person, staff must ask for an official picture identification, such as a Colorado Driver’s License, and record the identification number.
3. Emergency contact information should be updated when a child moves or annually.
Section 8: Philosophy

A. Family Partnership Agreements
B. Information Made Available for Families at Centers
C. Parenting Education
D. Parent Orientation
E. Parent Meetings
Section 8.A. Family Partnership Agreements

Effective Date: 1/1/00  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start embraces the concept of Family Partnership Agreements as a tool to help families set and achieve goals for family and personal growth. These agreements also are an important means of helping families understand and support Head Start’s goals for the child’s long-term success in school and in life. Delegate agencies will adopt, follow and document policies and procedures that support Family Partnership Agreements.

Denver Great Kids Head Start believes it is important for families to have the skills, knowledge and practices to be effective as their child’s first and primary teacher.

Denver Great Kids Head Start believes thoughtful program improvement planning requires tracking and reporting the rate and timing at which family partnership agreements are developed, followed and realized.

Denver Great Kids Head Start also believes thoughtful program planning requires tracking, reporting and analyzing the strength based to writing the family partnership agreements, to following them or to succeeding at the goals set in them. Delegates will set up and follow a system for regular tracking and reporting of progress in developing successful family partnerships for all families enrolled in Head Start in their agency.
Section 8.B. Information Made Available for Families at Centers

Effective Date: 1/1/00            Revision Date: 7/1/14            Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start and the Head Start Program Performance Standards require the sharing of certain kinds of information with parents at each Head Start center. This information informs parents of their rights and responsibilities and promotes four kinds of parental involvement: 1) decision-making, 2) classroom participation, 3) activities and resources designed for and by parents, 4) parents working with their own children in cooperation with Denver Great Kids Head Start. Each Denver Great Kids Head Start delegate agency must adopt, follow, and document policies and procedures to ensure sharing program required and appropriate information and the posting of information as required in the Head Start Performance Standards and other applicable laws and regulations. Delegate agencies must have clearly defined duties for maintaining information for families.

EXAMPLES OF PROCEDURES:

Each Head Start center will have the following items available to parents in an area specifically designated for them, such as bulletin board, shelf, notebook, or parent room.

1. PARENT INVOLVEMENT MATERIALS MAY INCLUDE:
   a) Welcome sign in English and Spanish or in other language used by Center families;
   b) Head Start Performance Standards;
   c) Parent Handbook;
   d) Grievance procedures;
   e) Teacher planning and daily classroom plans;
   f) Center parent committee meeting minutes and agenda for next meeting;
   g) Notebook with previous center parent committee meeting minutes, flyers, expenditure report, account page, and agenda;
   h) Center newsletter and calendar for current month;
   i) Denver Great Kids Head Start Policy Council meeting minutes and meeting schedule;
   j) Job openings;
   k) Delegate agency policy committee minutes and meeting schedule;
   l) Nutrition newsletter;
   m) Denver Great Kids Head Start Health Policy and Procedures Manual;
   n) Denver Great Kids Head Start Policy Manual
2. **RESOURCES FOR PARENTS MAY INCLUDE:**

   a) Resource lists or notebook of resources on child development must be available in English and Spanish
   b) Current job openings
   c) Learning and socializing activities for parents and children made available
Section 8.C. Parenting Education

Effective Date: 1/1/00        Revision Date: 7/1/14        Approval Date: 8/26/14

POLICY:

Denver Great Kids Head Start requires its delegate agencies to offer parenting education at no cost to parents. Denver Great Kids Head Start delegate agencies must adopt, follow, and document policies and procedures to ensure that parent education is offered at no cost to parents and those parenting resources, lists of materials and activities are also available in the parent’s primary language. At a minimum, subjects must include child development, behavior management, and nutrition. Further, information about school readiness strategies must also be included in the education materials and training opportunities.
Section 8. D. Parent Orientation

Effective Date: 2/14/14    Revision Date: 7/1/14    Approval Date: 8/26/14

POLICY:

Parents will receive orientation to the Head Start Program.

GUIDELINES:

1. Orientation will begin on first contact with parent.

2. Parents will be provided information regarding their ability to participate in the program, activities and services available to them.

3. Parents will receive information on educational and program participation opportunities available to them as individual or as groups.

4. Orientation will include information regarding:
   a) Program philosophy, goals and objectives, including school readiness philosophy
   b) Program/classroom description & location
   c) Parent involvement opportunities and activities
   d) Program services including; mental health, crisis intervention
   e) Program calendar/schedule
   f) Literacy/training/career development opportunities
      i. Relevant policies (attendance, child abuse/neglect reporting, confidentiality, no smoking, complaints/concerns, etc.)
   g) Parent Handbook
   h) Community Resource Directory
   i) Volunteer Handbook

5. Methods of orientation may include: individual or group training, parent meetings, orientation days, home visits, classroom visits, pre-screening opportunities, mailing of packets.
Section 8.E. Parent Meetings

Effective Date: 2/14/14  Revision Date: 7/1/14  Approval Date: 8/26/14

POLICY:

Parents will have the opportunity to participate in various meetings such as classroom committees, center committees, policy committees and policy council. All parent meetings will be held on a regular (monthly or bi-monthly) basis to provide opportunity for parents to become involved in on-site decision making, parent education and curriculum development.

PROCEDURE:

1. All parents at the Head Start site are members of a committee (center committee) and will receive notification of the time, date and location of the monthly meetings. Home base parents will be included as participants in center based meetings or may choose to conduct separate meetings.

2. All meeting types will be held at a time that is most convenient for the majority. Input as to these times will be solicited at the beginning of the program year.

3. Minutes/notes of each parent meeting will be recorded and include an attendance sheet, topics discussed, and decisions reached. Efforts will be made to inform parents who do not attend meetings, which could include posting minutes/notes in Parent Corner/bulletin board, sending a brief summary to each parent, or including information in newsletters, etc.

4. The agenda for parent meetings types will contain at least the following items;
   a) Policy Committee/Policy Council report - Representative or alternate representative (a report back to parents of the discussions/decisions made by the delegate agency policy committee or policy council or the grantee policy council
   b) Classroom update/activities/curriculum - Teacher/Home Visitor
   c) Community resource update – Family Service staff/Home Visitor
   d) Parent education topic – Family Service staff/Home Visitor or guest speaker

5. Monthly parent meeting dates, attendance, and education(training) topics will be reported on the Monthly Policy Council Delegate Report and a copy submitted to the grantee’s Family Services Director by the 9th working day of each month.