

Governance, Leadership, and Oversight Capacity Screener

Introduction

Organizations that accept federal funds to operate Head Start and/or Early Head Start programs must have strong governance systems in place to safeguard federal dollars and provide oversight and direction to the Head Start program.

This screener organizes the Head Start requirements to help organizations identify where they need to make changes and build capacity to fulfill their Head Start governance responsibilities.

Suggestions for Use

1. Print a copy of this screener.
2. Have your organization's governing body or Tribal Council chair, Policy Council chair, executive director, and Head Start program director work together to review the table beginning on page 3 and to identify (with a check mark or "X") the following items:
 - i. Required Head Start governance practices that your organization currently has in place
 - ii. Required Head Start governance practices that your organization will implement within the first three months of funding
 - iii. Required Head Start governance practices that your organization needs help understanding and implementing
3. On the final page of this document list the governance practices and regulations that your organization needs assistance in understanding and implementing.
4. Enter any questions or concerns you have in the comments section on the final page of this document.
5. Share this screener and your findings with your full governing body or Tribal Council, Policy Council, and Head Start program leadership. Assign people to begin implementation of the governance practices you have identified as not currently in place.
6. You can explore the [Organizational Leadership](#) page on the Early Childhood Learning and Knowledge Center (ECLKC) to access other resources that can assist you as you move your governance system and practices forward.
7. At your next meeting with Regional Office staff, discuss those governance practices and regulations where your organization may benefit from technical assistance.

Head Start Governance Practices and Related Regulations	Practice/Procedure is currently in place	Practice/Procedure will be fully implemented within first three months of funding	Our organization needs assistance in understanding and implementing this regulation
1. The governing body (or Tribal Council) has the required composition. Head Start Act Sec. 642(c)(1)(B) (i-iv)			
<ul style="list-style-type: none"> At least one member has fiscal/accounting background and expertise 	Exception <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> At least one member has early childhood education and development background and expertise 	Exception <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> At least one member is a licensed attorney 	Exception <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> Members reflect the community served and include parents of children who are currently, or were formerly, enrolled in Head Start programs 	Exception <input checked="" type="checkbox"/>		
2. The Policy Council has the required composition. Head Start Act Sec. 642(c)(2)(B)(i) Sec. 642(c)(2)(B)(ii)(I- II)			
<ul style="list-style-type: none"> A majority are parents of children who are currently enrolled in the Head Start program (including delegate agencies) 	X		
<ul style="list-style-type: none"> Other members are representatives at-large of the community served by the program or any delegate agency (may include parents of children formerly enrolled) 	X		

Commented [1]: District CFO and Finance Dept report to Board monthly

Commented [2]: Executive Director (Director of Early Learning) has background in early childhood

Commented [3]: District attorneys and Legal Dept report to Board monthly

Commented [4]: Members reflect the community served. Unknown if any members are or were parents of children enrolled in Head Start

Commented [5]: The Board are comprised of elected officials

- Members are elected by parents of children currently enrolled in the program

¹ If the composition of the governing body does not include individuals with the required qualifications, the governing body must use consultants or other individuals with relevant expertise and qualifications to meet the composition requirements [Head Start Act Sec. 642(c)(1)(B)(vi)].

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<p>3. The Head Start program must ensure that members of the:</p> <p style="text-align: right;">Head Start Act Sec.642(c)(1)(C), 642(c)(2)(C), and 642(c)(3)(B)</p> <p style="text-align: right;">Head Start Program Performance Standards 1301.2(a) and 1301.3(b)(2)</p>			
<ul style="list-style-type: none"> Governing body do not have a conflict of interest 	X		
<ul style="list-style-type: none"> Policy council, and of the policy committee at the delegate level, do not have a conflict of interest 	X		
<p>4. Head Start program has established a parent committee comprised exclusively of parents of currently enrolled children as early in the program year as possible.</p> <p style="text-align: right;">Head Start Program Performance Standards 1301.4 (a)</p>			
<ul style="list-style-type: none"> The committee is established at the center level for center-based program and at the local program level for other program options 	X		
<p>5. Governing body may establish advisory committees as it deems necessary for effective governance and improvement of the program.</p> <p style="text-align: right;">Head Start Program Performance Standards 1301.2(c)</p>			

Commented [6]: That requirement is met and also the Board liaison serves as a member of a public entity (PPS).

Commented [7]: All members are currently enrolled parents and are elected by the parent community. No PC officers are employed by PPS Head Start.

Commented [8]: In essence, the Policy Council is the Parent Committee and serves all the functions outlined in the standard. Due to COVID, enrollment has been very low for the 2020-2021 and start of the 2021-2022 school years. We have much fewer parents available to serve.

Commented [9]: Parent Committees are formed as an outtake of the Policy Council operations, meaning, if a need is identified at a site or program wide, a committee is formed through the Policy Council process

<ul style="list-style-type: none"> Establish the structure, communication, and oversight in such a way that the governing body continues to maintain its legal and fiscal responsibility 	X	
<ul style="list-style-type: none"> Notify responsible HHS official of intent to establish an advisory committee 	X	

Commented [10]: Delegates the day-to-day operations to the Legal and Finance departments of PPS. These departments report to the PPS board on a monthly basis.

Commented [11]: Board liaison trained and in place annually



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<p>6. Members of the governing body (or Tribal Council) receive effective and ongoing training and technical assistance (T/TA) to ensure that they understand the information they receive and are able to provide effective oversight of, make appropriate decisions for, and participate in programs of the Head Start agency.</p> <p style="text-align: right;">Head Start Act Sec. 642(d)(3)</p>			
<ul style="list-style-type: none"> The agency has a system for identifying the T/TA needs of the governing body (or Tribal Council) and using this information to develop a T/TA plan 	X		
<p>7. Members of the Policy Council receive effective and ongoing training and technical assistance (T/TA) to ensure that they understand the information they receive and can provide effective oversight of, make appropriate decisions for, and participate in programs of the</p> <p style="text-align: right;">Head Start Act Sec. 642(d)(3) Head Start Program Performance Standards 1302.12(m)</p>			

Commented [12]: Board liaison appointed annually by Board Chair. Orientation and training occur yearly.

Head Start agency.			
<ul style="list-style-type: none"> The agency has a system for identifying the T/TA needs of the Policy Council and using this information to develop a T/TA plan 	X		
<ul style="list-style-type: none"> T/TA or orientations include training on program performance standards and training indicated in 1302.12(m) 	X		

Commented [13]: PC receives training annually and ongoing via OHSA and NHSA opportunities

Commented [14]: Occurs annually every fall

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8. The governing body (or Tribal Council) exercises the following responsibilities: <p style="text-align: right;">Head Start Act Sec. 642(c)(1)(E)(iv)(I-III)</p> <p style="text-align: right;">Sec. 642(c)(1)(E)(iv)(VI)</p>			
<ul style="list-style-type: none"> Establishes procedures and criteria for recruiting, selecting, and enrolling children 	X		
<ul style="list-style-type: none"> Selects delegate agencies, as appropriate 	NA		

Commented [15]: Coordinated Enrollment efforts with PPS Early Learning Dept. ERSEA managed by Head Start Family Service Manager. Synergy and Child Plus

<ul style="list-style-type: none"> Develops procedures for selecting Policy Council members 	X		
<ul style="list-style-type: none"> Reviews applications and amendments to applications for funding 	X		
9. The governing body (or Tribal Council) exercises responsibility for the following: Head Start Act Sec. 642(c)(1)(E)(iv)(VII)(aa)-(dd)			
<ul style="list-style-type: none"> Approval of all major financial expenditures of the agency 	X		
<ul style="list-style-type: none"> Annual approval of the operating budget of the agency 	X		
<ul style="list-style-type: none"> The selection (except when a financial auditor is assigned by the state under state law or is assigned under local law) of independent financial auditors to report all critical accounting policies and practices to the governing body (or Tribal Council) 	X		

Commented [16]: Head Start Director & Management Team develop procedures.

Commented [17]: Board reviews and approves applications and amendments for all funding sources

Commented [18]: We are assigned a Grant Accounting specialist and have monthly meetings with Grant Accounting

Commented [19]: PPS is audited regularly

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<ul style="list-style-type: none"> The financial audit 	X		

Commented [20]: Through the PPS Finance Dept

<ul style="list-style-type: none"> Monitoring of the agency's actions to correct any audit findings and other actions necessary to comply with applicable laws (including regulations) governing financial statement and accounting practices 	X		
<p>10. The governing body (or Tribal Council) is engaged in reviewing and approving each of the following:</p> <p style="text-align: right;">Head Start Act Sec. 642(c)(1)(E)(iv)(V)(aa-cc) Sec. 642(c)(1)(E)(iv)(VIII)-(IX)</p>			
<ul style="list-style-type: none"> The annual self-assessment 	X		
<ul style="list-style-type: none"> The agency's progress in carrying out the programmatic and fiscal provisions in the agency's grant application, including implementation of corrective actions 	X		
<ul style="list-style-type: none"> Personnel policies of the agency regarding the hiring, evaluation, termination, and compensation of agency employees 	X		
<ul style="list-style-type: none"> Results from monitoring conducted under section 641A(c), including appropriate follow-up activities 	X		

Commented [21]: Through the PPS Finance and other PPS depts, including Head Start, if any audit findings and corrections are to be made.

Commented [22]: Through Head Start finance team (BOA, Bookkeeper, LT Analyst) and the Grant Accounting dept of PPS.

Commented [23]: PPS Human Resources dept & HS director & management team.

Commented [24]: All funding streams require regular reports on grant deliverables relevant to the standards listed under 641A(c). In addition, Focus Area Reviews are conducted every grant cycle. The Board is informed of and involved in these reviews as requested.

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11. The program staff ensures the parent committee assumes responsibility for the following:		Head Start Program Performance Standards 1301.4 (b)	
<ul style="list-style-type: none"> Work with program staff to determine the best methods to engage families using strategies that are most effective in their community 	X		
<ul style="list-style-type: none"> Advise staff in developing and implementing local program policies, activities, and services to ensure they meet the needs of children and families 	X		
<ul style="list-style-type: none"> Participate in the recruitment and screening of Early Head Start and Head Start employees 	Exception		
12. The Head Start program works with the governing body (or Tribal Council) and Policy Council to make available to the public a report published at least once each year that discloses the following information from the most recently concluded fiscal year:		Head Start Act Sec. 644 (a)(2)(A-H)	
<ul style="list-style-type: none"> The total amount of public and private funds received and the amount from each source 	X		
<ul style="list-style-type: none"> An explanation of budgetary expenditures and proposed budget for the fiscal year 	X		

Commented [25]: Monthly Policy Council meetings where Family Service Manager and Family Engagement and Outreach Coordinator are present

Commented [26]: See comment above

Commented [27]: District HR policies guide the recruitment and hiring of Head Start staff

Commented [28]: A complete budget report is provided to the Policy Council monthly. The program's Community Needs Assessment, Self-Assessment, and Annual Report are provided to the Board and Policy Council as well as posted on the programs website

Commented [29]: See comment above

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<ul style="list-style-type: none"> The total number of children and families served, the average monthly enrollment (as a percentage of funded enrollment), and the percentage of eligible children served 	X		
<ul style="list-style-type: none"> The results of the most recent review by the Secretary and the financial audit 	X		
<ul style="list-style-type: none"> The percentage of enrolled children that received medical and dental exams 	X		
<ul style="list-style-type: none"> Information about family engagement activities 	X		
<ul style="list-style-type: none"> The agency's efforts to prepare children for kindergarten 	X		
<ul style="list-style-type: none"> A summary of a program's most recent community assessment 1302.102(d)(2) 	X		
<ul style="list-style-type: none"> Any other information required by the Secretary 	X		
13. The following reports are received by the governing body and		Head Start Act Sec. 642(d)(2)(A-1) Head Start Program Performance Standards 1302.102	

Commented [30]: Monthly via Director's Report at Policy Council meetings. Annually to Board and PC through Community Needs Assessment

Commented [31]: FA1 and FA2 as they occur. District audits as they occur

Commented [32]: Monthly via Director's Report at Policy Council meetings

Commented [33]: See comment above

Commented [34]: CNA, SA, federal reviews, Annual Report

Commented [35]: Full report is provided to Board and PC when completed each year

Commented [36]: As requested

the Policy Council and members find them useful:			
Annual reports:			
• The financial audit	<input checked="" type="checkbox"/>		
• The self-assessment, including any findings related to such assessment	X		

Commented [37]: CNA, SA, Annual report, as requested

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• Program Information Reports (PIRs)	<input checked="" type="checkbox"/>		
Monthly reports:			
• Financial statements, including credit card expenditures (if the program uses credit cards)	<input checked="" type="checkbox"/>		
• Program information summaries	<input checked="" type="checkbox"/>		
• Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency	<input checked="" type="checkbox"/>		

Commented [38]: Provided annually when completed

Commented [39]: Monthly via Treasurer's Report to Policy Council

Commented [40]: Monthly via Director's Reports to Policy Council

Commented [41]: Monthly via Director's reports to PC; partially subsidized care is not applicable to us

<ul style="list-style-type: none"> • Reports of meals and snacks provided through programs of the U.S. Department of Agriculture (USDA) 	X		
Additional reports:			
<ul style="list-style-type: none"> • Community assessment, completed every five years with annual updates 	X		

Commented [42]: Program has provided CACFP reports. Now district has responsibility and meals are under NSLP

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<ul style="list-style-type: none"> • Long-term goals for ensuring programs are and remain responsive to community needs, goals for the provision of educational, health, nutritional, and family and community engagement, program services to promote the school readiness of enrolled children, school readiness goals, and short-term measurable programmatic and financial objectives 	X		
<ul style="list-style-type: none"> • Applicable and current updates from the Secretary (e.g., Program Instructions, Information Memorandums, etc.) 	X		

Commented [43]: 5-Year Program Goals are developed every 5-year cycle and are updated annually. CNA recommendations are tracked. School Readiness goals are developed and data is taken to track progress.

Commented [44]: Head Start Director develops and submits Board resolutions and strives to pass along all relevant PIs and Memos.

<ul style="list-style-type: none"> Ongoing monitoring data, data on school readiness goals and other information described in 1302.102 	X		
<p>14. Head Start agency's governing body and Policy Council have jointly established written procedures for resolving internal disputes between the governing board and Policy Council in a timely manner that includes impasse procedure. These procedures must:</p>			
<ul style="list-style-type: none"> Demonstrate that the governing body considers proposed decisions from the Policy Council and that the Policy Council considers proposed decisions from the governing body 	X		

Commented [45]: Data from Child Plus, DRDP, Synergy, CNA, etc are collected.

Commented [46]: See dispute resolution process approved in March/April 2020

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<ul style="list-style-type: none"> If there is a disagreement, require the governing body and the Policy Council to notify the other in writing why it does not accept a decision 	X		
<ul style="list-style-type: none"> Describe a decision-making process and a timeline to resolve disputes and reach decisions that are not arbitrary, capricious, or illegal 	X		

<ul style="list-style-type: none"> Governing body and Policy Council must select a mutually agreeable third-party mediator (as outlined in impasse procedures) 	X		
<ul style="list-style-type: none"> Governing body and Policy Council are prepared to participate in a formal process of mediation that leads to a resolution of the dispute (as outlined in Impasse procedures) 	X		
15. If no resolution is reached with a mediator (NOTE: American Indian and Alaska Native Programs skip and move to next section)		Head Start Program Performance Standards 1301.6 (c)	
<ul style="list-style-type: none"> Governing body and Policy Council must select a mutually agreeable arbitrator whose decision is final 	X		

Commented [47]: As noted in policy/procedure, decision of the mediator is final

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16. The Policy Council approve and submit to the governing body decisions about each of the following activities of program operations:		Head Start Act Sec. 642(c)(2)(D)(i-viii) Sec. 642(c)(2)(A) Head Start Program Performance Standards 1302.101(b)(4)	
<ul style="list-style-type: none"> Activities to support the active engagement of families in the program 	X		

Commented [48]: See previous Board resolution submissions

• Program recruitment, selection, and enrollment priorities	X		
• Applications for funding and amendments to applications for funding	X		
• Budget planning for program expenditures, including policies for reimbursement related to participation in Policy Council activities	X		
• Bylaws for the operation of the Policy Council	X		
• Program personnel policies and decisions regarding the employment of program staff, consistent with 642(c)(1)(E)(iv)(IX), including standards of conduct for program staff, contractors, and volunteers and criteria for the employment and dismissal of program staff	X		

Commented [49]: This is supported and managed by the district HR Dept

Commented [50]: PC does approve hirings when recs to fill are submitted

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17. A program must submit reports, as appropriate, to the HHS official immediately or as soon as practicable:		Head Start Program Performance Standards 1302.102 (d) and 1304.12	

<ul style="list-style-type: none"> Any significant incidents affecting the health and safety of program participants 	X		
<ul style="list-style-type: none"> Circumstances affecting the financial viability of the program 	X		
<ul style="list-style-type: none"> Breaches of personally identifiable information 	X		
<ul style="list-style-type: none"> Program involvement in legal proceedings 	X		
<ul style="list-style-type: none"> Any matter for which notification or a report to state, tribal or local authorities is required by law: <ul style="list-style-type: none"> Reports addressing child abuse and neglect or laws governing sex offenders Incidents that require classrooms or centers to be closed for any reason Legal proceedings directly related to program operations <ul style="list-style-type: none"> All conditions required to be reported under 1304.12 including child and Adult Care Food Program (CACFP) 	X		

Commented [51]: Program follows district, local, and state health and safety guidelines

Commented [52]: Supported by Grant Accounting and Finance Dept

Commented [53]: Also have BOA and Bookkeeper on staff

Commented [54]: PPS IT Dept

Commented [55]: PPS Legal Dept

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Comments section:

Our organization needs assistance in understanding and implementing the following governance regulations:

Additional comments, questions, or concerns:



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pmfo@ecetta.info • <https://eclkc.ohs.acf.hhs.gov/hslc/ta-system/operations> • Tel: 888 874-5469